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# 31

## Action

### *Public Hearing*

#### **Proposed Amendments to Title 5 of the California Code of Regulations Pertaining to the PK-3 Early Childhood Education Specialist Instruction Credential**

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**Executive Summary:** This agenda item presents a public hearing requested by a member of the public on the proposed regulations of the California Code of Regulations (CCR), 80067, 80067.1, 80067.2, and 80067.3 approved by the Commission at its December 2022 Commission meeting to implement the PK-3 Early Childhood Education (ECE) Specialist Instruction Credential and the accompanying Program Preconditions, Program Standards, and Teaching Performance Expectations (TPEs).

**Recommended Action:** That the Commission consider written comments received and comments made during the public hearing to determine whether changes are needed to the proposed regulations and that the Commission consider recommended changes from staff based on public comments received.

**Presenters:** David DeGuire, Director, and Phyllis Jacobson and Renee Marshall, Administrators, Professional Services Division

#### **Strategic Plan Goal**

##### ***II. Program Quality and Accountability***

- a) Develop and maintain rigorous, meaningful, and relevant standards that drive program quality and effectiveness for the preparation of the education workforce and are responsive to the needs of California's diverse student population

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# Proposed Amendments to Title 5 of the California Code of Regulations Pertaining to the PK-3 Early Childhood Education Specialist Instruction Credential

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## Introduction

This agenda item presents a public hearing requested by a member of the public on the proposed regulations of the California Code of Regulations (CCR), 80067, 80067.1, 80067.2, and 80067.3 approved by the Commission at its December 2022 Commission meeting to implement the PK-3 Early Childhood Education (ECE) Specialist Instruction Credential and the accompanying Program Preconditions, Program Standards, and Teaching Performance Expectations (TPEs).

## Background

The Commission adopted regulations for the authorization and credential requirements for the PK-3 ECE Specialist Instruction credential at its [August 2022](#) meeting and adopted the program standards and teaching performance expectations for this credential at its [October 2022](#) meeting. At its [December 2022](#) meeting, the Commission adopted the full set of regulations for the credential with minor revisions and directed staff to move forward with the rulemaking process, which included a notice for a 45-day public comment period. This agenda item includes (a) a brief timeline of actions taken to develop the PK-3 ECE Specialist Instruction Credential, (b) recommended changes to the regulations based on comments received during the public comment period, (c) a list of issues and objections received during the public comment period with responses from Commission staff ([Appendix B](#)), (d) the draft regulations adopted by the Commission in December 2022 with revisions based on public comment and staff review ([Appendix C](#)), and (e) a compendium of all letters received as of April 6, 2023 ([Appendix D](#)).

## Timeline for the Development of the PK-3 Early Childhood Education Specialist Instruction Credential

Provided below is a brief timeline of Commission actions to date regarding the development of the PK-3 Early Childhood Education Specialist Instruction credential. Each agenda item listed below was available for widespread review and comment by the public, as detailed in the agenda item referenced. A more extensive timeline detailing the Commission's work in early childhood education since 2015 is included in [Appendix A](#).

- In [September 2021](#) the Commission reviewed a plan for establishing an ECE Credentialing Workgroup consisting of practitioners, higher education faculty from 2- and 4-year colleges and universities, employers and other education partners to advise the Commission on potential requirements for updating the Early Childhood Specialist Credential to serve as a new PK-3 ECE Specialist Instruction Credential, as called for in the Master Plan for Early Learning and Care.
- In [April 2022](#), the Commission reviewed a draft authorization statement, draft Teaching Performance Expectations, draft PK-3 ECE Specialist Instruction Credential requirements along with candidate options and pathways for meeting these requirements, and draft

preparation Program Standards for the credential based on recommendations from the Early Childhood Credentialing Workgroup as well as public input.

- In [June 2022](#), the Commission endorsed the program standards and teaching performance expectations and directed staff to review additional feedback and make any further modifications to the TPEs and Program Standards as appropriate.
- At its [August 2022](#) meeting, the Commission approved the authorization statement and requirements for the credential.
- The [October 2022](#) Commission agenda item presented the final draft versions of the PK-3 ECE Specialist Instruction Credential Program Preconditions, Program Standards, and Teaching Performance Expectations (TPEs), including the updated TPEs and program standards for Literacy and Math, along with additional modifications based on further public input.
- In [December 2022](#), the Commission approved the complete set of proposed regulations for the credential and directed staff to follow procedures to promulgate the regulations.
- On February 10, 2023, staff published a [coded correspondence](#) providing notice of the proposed regulations and its 45-day written comment period.
- After receiving a request for a public hearing, staff published on March 23, 2023, a [notice of public hearing](#) on the proposed regulations for April 21, 2023.

### **Proposed Amendments to the Regulations**

The Commission has received significant feedback from members of the public (see [Appendix D](#)) on the proposed PK-3 Early Childhood Education Specialist Instruction credential requirements and standards. As a result of, and in response to these comments, staff requests that the Commission consider three substantive amendments to the regulation text as it presently stands:

(1) The first proposed amendment is related to the acceptance of supervised practicum coursework completed by a candidate at a regionally accredited institution of higher education towards meeting the required clinical practice hours.

(2) The second is a proposal to provide for two possible authorization options within the PK-3 ECE Specialist Instruction credential to help remove barriers to the credential for current ECE workforce members and better meet the needs in the field as expressed in both the written comments submitted for this public hearing and prior public comment obtained through public input sessions during the development of the PK-3 ECE Specialist Instruction credential. This proposal would, if approved by the Commission, provide for the following two authorizations within the ECE Specialist Instruction credential: (a) an authorization for teaching grades PK, TK, and Kindergarten for those candidates whose clinical practice experience was limited to only that specific grade range, and (b) an authorization to teach PK through Grade 3 for those candidates whose clinical practice experience also included the grade range of 1-3.

(3) The third is a proposed reconfiguration of the grade levels in which a candidate must complete clinical practice in order to meet the 600-hour clinical practice credential requirements.

Each of these three proposed amendments along with the underlying rationale is explained in more detail below.

*Proposed Amendment #1: Acceptance of Practicum Coursework Toward the Required Clinical Practice Hours*

A number of respondents to the proposed regulations commented that many individuals complete a rigorous, guided, and supervised practicum as part of their work toward the Child Development Teacher Permit or as part of a degree major in Early Childhood Education or Child Development and that these hours should count toward the 600 hours of clinical practice requirement for that grade level as required by the proposed standards and regulations. Staff propose that the Commission consider modified language in the proposed regulations regarding credential requirements and preconditions that would recognize and count these practicum hours up to a maximum of 200 hours towards meeting the clinical practice requirement.

The Commission has already included in the proposed regulations other means of recognizing the experience of many of the state's early childhood educators. The original proposed regulations include a provision to recognize and grant 200 hours of clinical practice toward the 600 hour requirement to those individuals with six or more years of teaching experience serving on a Child Development Teacher Permit or higher in a preschool setting. This new provision would be consistent with the Commission's intent to recognize the preparation and expertise of the existing early childhood workforce by allowing for the practicum coursework previously completed at a regionally accredited community college or baccalaureate granting college or university to count toward the clinical practice requirements for the PK-3 ECE Specialist Instruction credential. Candidates seeking the PK-3 ECE credential who complete practicum coursework as defined and meet the six years of teaching experience provisions of the regulation would be able to meet up to 400 hours of clinical practice experience toward the 600 hour requirement if the Commission approves this proposed amendment.

The proposed new language for the credential requirements reads as follows:

80067 (d)(2) Candidates for the ECE Specialist Instruction who have completed a practicum course at a regionally accredited institution of higher education, including a community college, shall be granted clinical practice equivalency for these hours commensurate with the number of hours served in the practicum course, up to a maximum of 200 hours, provided that all of the following conditions are met:

(A) The practicum course is credit bearing and degree applicable towards a Teacher Level or higher level Child Development Permit or a degree in Early Childhood Education, Child Development, Child and Adolescent Development, or Human Development.

(B) The practicum included clinical practice experience that was supervised at minimum by a trained faculty member/instructor who provided observation and feedback to the candidate.

(C) The candidate earned a C or better on the practicum course. Courses earned with a "Pass," or another designation deemed by the institution of higher education to be equivalent to a grade of "C" or higher are also acceptable.

(D) The candidate provides to the Commission-approved ECE Specialist Instruction program verification of the hours served through transcripts and other documentation as determined by the Commission-approved program.

(3) Candidates who have completed both a verified work experience as outlined in paragraph (d)(1) above and a qualified practicum experience as outlined in paragraph (d)(2) above may be granted a maximum of 400 hours total toward the clinical practice requirement and shall complete the remaining 200 hours of clinical practice in the teacher preparation program.

The proposed new language for the preconditions is as follows:

80067.1 (g)(4) Candidates for the ECE Specialist Instruction who have completed a practicum course at a regionally accredited institution of higher education, including a community college, shall be granted clinical practice equivalency for these hours commensurate with the number of hours served in the practicum course, up to a maximum of 200 hours, provided that all of the following conditions are met:

(A) The practicum course is credit bearing and degree applicable towards a Teacher Level or higher level Child Development Permit or a degree in Early Childhood Education, Child Development, Child and Adolescent Development, or Human Development.

(B) The practicum included clinical practice experience that was supervised at minimum by a trained faculty member/instructor who provided observation and feedback to the candidate.

(C) The candidate earned a C or better on the practicum course. Courses earned with a "Pass," or another designation deemed by the institution of higher education to be equivalent to a grade of "C" or higher are also acceptable.

(D) The candidate provides to the Commission-approved ECE Specialist Instruction program verification of the hours served through transcripts and other documentation as determined by the Commission-approved program.

(5) Candidates who have completed both a verified work experience as outlined in paragraph (g)(2) above and a qualified practicum experience as outlined in paragraph (g)(4) above may be granted a maximum of 400 hours total toward the clinical practice requirement and shall complete the remaining 200 hours of clinical practice in the teacher preparation program.

*Proposed Amendment #2: Create two authorizations within the PK-3 ECE Specialist Instruction credential.*

The original proposed regulation would establish a single authorization for the PK-3 ECE Specialist credential that would include teaching all grades PK-3. Many comments were received during the public comment period recommending that the Commission make the credential more accessible to current early childhood educators who seek to teach TK. More than one letter (from Learning Policy Institute, Children Now, Deborah Stipek, and others) recommended that the Commission recognize that early educators with preschool teaching experience who seek to teach TK on an intern credential would find it challenging to complete a second 200 hour placement in another grade level while serving as the teacher of record in a TK classroom. A recommendation was submitted that the Commission consider allowing candidates in this situation who cannot complete a clinical placement in grades K-3 while serving in a TK classroom to earn an authorization to serve in a P-K classroom setting once they meet all other requirements for the credential. If such candidates subsequently complete 200 hours of clinical practice in the upper grades 1-3, they would then be able to teach the full grade range of PK-3. Another letter (from Children Now) also recognized the challenge of requiring dual placements and recommends that the Commission eliminate this requirement.

Staff recognize the challenges raised by these and other public comments related to requiring candidates for this credential to have experience across the PK-3 grade range, and also recognize the need for credential holders to have exposure to students and the conditions of teaching and learning reflected in the PK-3 grade span. Given the significant demand for TK teachers over the next few years, and the diversity and strong foundation in early childhood education that many in the early learning workforce bring to this work, staff recommend that the Commission consider establishing two authorizations within the PK-3 ECE Specialist Instruction credential.

Establishing two authorizations within the PK-3 ECE Specialist Instruction credential would allow candidates who complete all of their 600 clinical practice hours in a PK, TK, or K setting and have completed all other requirements for the credential to be granted an authorization to teach PK-Kindergarten. This approach would reduce barriers and expand access to credentials for members of the current early childhood education workforce who have already completed a practicum as part of their permit or applicable degree work. These candidates, who would complete all other requirements for the PK-3 ECE Specialist Instruction credential prior to earning the PK-Kindergarten authorization, would be able to add the full authorization through grade 3 by completing an additional 200 hours of clinical experience in grades 1, 2 or 3.

*Proposed Amendment #3: Reconfiguration of the Clinical Practice Grade Levels*

The original proposed regulations require a total of 600 hours of supervised clinical practice experience, consistent with the clinical practice requirement for other teaching credentials. Specifically, the proposed regulations require that candidates complete 200 hours in a PK/TK setting and 200 hours in a K-3 setting. Another 200 hours may be in any setting from PK-grade 3.

After consideration of a significant number of comments received on the proposed regulations, staff requests that the Commission consider adjusting the structure of the required clinical practice hours to be 200 hours in a PK, TK, or K setting, 200 hours in grades 1, 2 or 3, and the remaining 200 hours in any setting PK-3.

Many comments received suggested this change as a way to remove a major barrier to this credential. The change in how the clinical practice hours would be distributed would also resolve another concern that has previously been raised. Because the definition of TK is the first year of a 2-year Kindergarten experience, the recommendation by the PK-3 Credential Advisory Workgroup dividing the clinical practice experiences between TK and K has caused some confusion. Although TK and K may be different in significant ways, by requiring 200 hours in either a PK, TK, or K classroom and another 200 hours in grade 1, 2, or 3 setting, programs may find it easier to place candidates in clinical practice settings and thus allow for more coherence in candidates' clinical practice experience.

This approach would also continue to ensure that candidates with the broader PK-3 authorization as proposed in Amendment #2 above that includes teaching all grades PK-3 will have experiences with students in early elementary grades 1, 2 and/or 3. This approach would also maintain high quality in preparation by ensuring that candidates with the broader PK-3 authorization that includes all grades PK-3 will have experiences with students in PK-K as well as early elementary grades 1, 2 or 3.

To summarize, if adopted by the Commission proposed amendment #2 would provide for two separate authorization options, depending on the candidate's prior background and experience:

- Candidates who complete 600 hours of clinical practice experience in a PK, TK, and/or K setting as well as all other requirements for the credential would earn the authorization to teach PK-Kindergarten.
- Candidates who complete a clinical practice experience of 600 hours with 200 in PK, TK, and/or K, another 200 hours in grades 1, 2 or 3, and another 200 hours in any setting PK-3, would earn the authorization to teach in PK-3.

All other requirements would apply to candidates seeking either of the authorizations, including the Reading Instruction Competency Assessment (RICA) or the Literacy Performance Assessment, as applicable. Proposed amendment #3 would distribute clinical practice across PK-K and grades 1-3 in support of these two authorization options. If the Commission approves proposed Amendments #2 and #3, the proposed language related to these changes would be as follows:

80067(a)(2)(C) includes preparation to serve English learners and a 600-hour clinical practice experience with a minimum of 200 hours in a preschool, ~~(PK)~~, and/or transitional kindergarten ~~(TK)~~, or kindergarten (PK-K) setting and a minimum of 200 hours in a ~~kindergarten~~ first, second or third grade (1-3) setting.

(i) A candidate who does not complete a clinical practice placement in a grade 1, 2 or 3 classroom may earn the authorization outlined in subsection (f)(2) by completing up to

400 hours in a preschool setting and at least 200 hours in a TK or K setting in the context of their professional preparation program.

and

(f) Authorizations and Scope: The authorization for the ~~PK-3~~ Early Childhood Education Specialist Instruction Credential shall be as follows any of the following based on the preparation completed:

(1) For candidates who complete the clinical practice requirements outlined in subsection (a)(2)(C) above, the authorization for teaching services shall be issued with the following statement: "This credential authorizes the holder to teach all subjects in a self-contained general education classroom setting and, as a self-contained classroom teacher, to team teach or to regroup students across classrooms, in preschool through grade three."

(2) For candidates who complete the clinical practice requirements outlined in subsection (a)(2)(C)(i) above, the authorization for teaching services shall be issued with the following statement: "This credential authorizes the holder to teach all subjects in a self-contained general education classroom setting and, as a self-contained classroom teacher, to team teach or to regroup students across classrooms, in preschool through kindergarten."

(3) The authorization for English learner services shall be issued with the following statement: "The following instructional services may be provided to English learners in the settings and content area(s) specified on this document: (1) English language development defined as instruction designed specifically for limited-English-proficient students to develop their listening, speaking, reading, and writing skills in English; and (2) specially designed content instruction delivered in English defined as instruction in a subject area, delivered in English, that is specially designed to meet the needs of limited-English-proficient students. This English learner authorization also covers classes taught on the basis of other valid, non-emergency credentials or permits held within the settings or content/specialty area(s) listed at the grade or age levels authorized."

(~~3~~4) In addition to the teaching authorizations provided in subsections (f)(1) or (f)(2) above, and in (f)(2) above, an intern credential shall be issued with the following statement: "This individual has completed the intern preservice preparation, which included specific instruction on the teaching of English learners and is participating in a Commission approved intern preparation program. The individual must be supported by both the commission accredited program and the employer in the area(s) listed and in their work with English learners and must make satisfactory progress toward program completion for the duration of the intern credential."

(~~4~~5) An intern credential shall also be restricted to service with the California employing agency identified by the commission accredited program sponsor.

If, however, the Commission does not wish to approve proposed Amendment #2, the original regulations language would remain unchanged other than as indicated below, and the PK-3 ECE Specialist Instruction credential would have a single authorization covering teaching in the full range of PK through Grade 3.



**Additional minor revisions:** The following minor revisions have been made to the proposed regulations based on public comment and staff review:

- The *California Preschool Learning Foundations and Frameworks* were added to the list of required preservice training required for intern candidates in PK and TK settings in section 80067.1 (h)(3)(A) of the proposed regulations.
- The term “PK-3” has been removed where the name of the credential appears in the proposed regulations to match the name of the credential in the Education Code. The term “PK-3” has been left in the names of supporting materials (e.g., program standards and TPEs because of the familiarity of this term within the field and to clarify the distinction and avoid inadvertent confusion between this credential and the Early Childhood Education Specialist credential that serves children with disabilities and other special needs and has a similar title).
- The phrase “or similar major” has been deleted from section 80067.1 (e)(1)(A) and (h)(2)(A) because it is overly vague.
- The number of hours to be considered a full-time PK teacher in section 80067 (d)(1)(B)(ii) was changed from four to three based on feedback from the field regarding actual practices.
- The word “proposed” was removed from “Proposed Preconditions Specific to Interns” in section 80067.1 (h)

### **Staff Recommendation**

Staff recommends that the Commission consider all public testimony made during the public comment portion of this item, as well as written comments submitted prior to the hearing. Staff recommends that the Commission approve the revised proposed regulations in [Appendix C](#) with the three amendments proposed above regarding the acceptance of practicum hours toward meeting the clinical practice requirement, creating a separate PK-K authorization within the ECE Specialist Instruction credential, and reconfiguring the clinical practice hours.

### **Next Steps**

Staff will continue the prescribed process for the regulations approved by the Commission for submission to the Office of Administrative Law.

## Appendix A

### Timeline of Prior Related Public Commission Agenda Items and Additional Opportunities for Public Input During the Development of the PK-3 ECE Specialist Instruction Credential

- Between 2015-17 the Commission's Child Development Permit Advisory Panel (CDP AP) reviewed the requirements for earning and renewing a Child Development Permit. Recommendations were presented to the [Commission agenda item in October 2017](#). This work included reviewing the conceptual underpinning of and the initial drafts of the [Teaching Performance Expectations](#) that were the first TPEs developed specifically for the field of Early Childhood Education and that served as the foundational basis and model for the future development of the PK-3 ECE TPEs.
- Between 2017 and 2019 [Teaching Performance Expectations](#) for the Child Development Permit were developed, and extensively reviewed by the field. As part of this process, the Commission directed staff to provide multiple opportunities for field input to gain the widest possible advice from the field concerning the content, relevance, and importance of the TPEs both individually and as a whole. The Performance expectations focused on assisting, teaching, mentoring, and leading in an ECE setting, and were adopted by the Commission in 2019.
- Program [Guidelines](#) for preparation leading to the Child Development Permit were also developed, reviewed by the field between 2017 and 2019 along with the TPEs as described above, and were presented to the Commission for adoption in 2019.
- In [February 2021](#), the Commission heard a presentation on the Master Plan for Early Learning and Care, which includes important framing for the development of the ECE workforce with implications for the Commission's work in this area. The development of a PK-3 ECE Credential was included in the scope of work within the Master Plan designated for the Commission to accomplish.
- The [August 2021](#) Commission agenda item described the status of the ongoing collaborative work with the field to implement the provisions of the Preschool Development Grant-Renewal (PDG-R) related to moving towards a competency-based preparation and licensure system for the ECE workforce, consistent with the Master Plan direction for the Commission's work and as a means of implementing the Commission's adopted ECE TPEs and Program Standards.
- The [September 2021](#) Commission agenda item addressed Establishing Multiple, Accessible Pathways to a Permit or Credential Authorizing Service in State Preschool and Transitional Kindergarten. This agenda item was the first to propose refocusing and repurposing the existing Early Childhood Specialist Credential to serve as a PK-3 credential along with the establishment of an ECE Credentialing Workgroup to advise the Commission on this work.
- The [February 2022](#) Commission agenda item focused on building multiple key pieces of infrastructure to support the transition of the preparation and licensure of the early childhood workforce to a competency-based system similar to that of all other credentials, and to further support the work to develop a PK-3 ECE Specialist Instruction Credential. In addition, the agenda item described the interagency collaborative efforts intended to help develop and provide multiple pathways for the early childhood education workforce based on the need for additional prepared ECE teachers created by

recent state initiatives and continue to support state efforts aligned with the state's [Master Plan for Early Learning and Care](#).

- The [April 2022](#) Commission agenda item indicated the draft Authorization Statement, draft Teaching Performance Expectations, draft PK-3 ECE Specialist Instruction Credential requirements along with candidate options and pathways for meeting these requirements, and draft preparation Program Standards for the credential along with summary information about public input activities and feedback as of April 2022.

At this meeting, staff presented the background and rationale for the Commission's recent work to redesign the ECE Specialist Instruction Credential that would authorize service in any of grades PK-3 and described the development process in which the ECE Credentialing Workgroup engaged to develop the drafts presented to the Commission for initial review. The Commission directed staff to move forward with the ECE Specialist Instruction Credential development process and provide further opportunities for public input and engagement relative to the Teaching Performance Expectations (TPEs) and the Program Standards.

- The [June 2022](#) Commission agenda item indicated the proposed credential requirements and authorization statement, the proposed TPEs and the proposed Program Standards for the PK-3 ECE Specialist Instruction Credential.

At this meeting, staff presented the results of the public input survey conducted between April and June 2022 and indicated the changes made to the TPEs and Program Standards as a result of the further public input received. The Commission endorsed the program standards and teaching performance expectations and directed staff to review additional feedback and make any further modifications to the TPEs and Program Standards as appropriate. The Commission did not adopt the TPEs and Program Standards at the June 2022 meeting, however, in order to wait until the updated Literacy TPEs and standards then currently under development pursuant to SB 488 (Chap. 678, Stats. 2021) implementation were available for inclusion into the PK-3 ECE Specialist TPEs and Program Standards. In addition, feedback from educational partners suggested that mathematics, a gateway to educational success along with literacy development, be included in the PK-3 standards and TPEs.

Between the June and August 2022 Commission meetings, development work to implement the provisions of SB 488 was taking place, including the development of Literacy TPEs updated for the PK-3 ECE Specialist Credential. Simultaneously, staff worked with ECE mathematics experts to develop a new program standard and TPEs for early mathematics learning.

- The [August 2022](#) Commission agenda item provided the proposed regulations, including the authorization statement and the requirements for the PK-3 ECE Specialist Instruction Credential that were approved at this meeting by the Commission for moving forward the regulations process.
- Also in August 2022, The [Resource Compendium](#) showing the range of current grants, financial and other supports available for candidates interested in earning the PK-3 ECE Specialist Instruction Credential was developed and published in collaboration with the

California Department of Education to help support preparation for the PK-3 ECE Specialist Credential.

- The [October 2022](#) Commission agenda item presented the final draft versions of the PK-3 ECE Specialist Instruction Credential Program Preconditions, Program Standards, and Teaching Performance Expectations (TPEs), including the updated SB 488-mandated Literacy TPEs and program standard applicable to the PK-3 ECE Specialist Instruction Credential, along with additional modifications based on further public input received at the June 2022 Commission meeting and through late September 2022. These modifications also include the addition of the preparation of teachers to address the instruction in foundational mathematics for PK-3 settings. The draft versions of the Program Preconditions, Program Standards and the TPEs have undergone several additional internal staff reviews as well as additional external review by ECE and Literacy experts. The mathematics standard (Standard 8) and TPES were also included in this agenda item for discussion and potential adoption.
- Between October and December 2022, a series of presentations about the PK-3 ECE Specialist Credential was made to interested groups in the field. A representative sample of these presentations is provided below.

#### **Power Point Presentations**

- [ACCCTEP meeting, November 2022](#)
- [CCAC meeting, November 2022](#) Open PDF in current window.
- [CCTE meeting, November 2022](#)
- [PK-3 ECE Specialist Instruction Credential Introduction Webinar November 16, 2022](#) Open PDF in current window.
- [PK-3 ECE Specialist Instruction Credential Q and A Webinar December 2, 2022](#) Open PDF in current window.
- [PK-3 Technical Assistance Webinar Slide Deck](#)

#### **Webinars**

In addition, multiple webinars were held between November 2022 and February 2023 to help inform the field and respond to questions, as follows:

- [PK-3 ECE Specialist Instruction Credential Introduction, November 16, 2022](#)
- [PK-3 ECE Specialist Instruction Credential Q and A, December 2, 2022](#)
- [Unpacking PK-3 Credential Math Program Standard Webinar, February 2, 2023](#)
- [Unpacking the PK-3 Credential Equity, Inclusion, & Diversity Program Standard Webinar, February 2, 2023](#)
- [Initial Program Review: PK-3 Specialist Instruction Programs, February 3, 2023](#)

**Appendix B**  
**Public Comments Received (as of April 6, 2023)**

**Tally of Responses**

As of April 6, 2023, the Commission had received the following written responses to the public announcement:

**Support**

4 organizational opinions  
 2 personal opinions

**Opposition**

0 organizational opinions  
 67 personal opinions

**Table 1. Objections Made to the Proposed Regulations**

Objections	Details
1. 80067.1. Preconditions	<b>Main concern</b> – Without clear required content regarding the development of young children, candidates may not learn everything they need.
	<i>Sample comment # 1 - Twenty-four units are a minimal requirement to provide a foundation of knowledge and competencies required to understand how to meet the needs of young children and to facilitate developmentally appropriate learning environments and experiences for them...Without clarification of required course content, candidates could have completed units not directly applicable to classroom practice.</i>  <i>Sample comment # 2 - The PK-3 ECE credential has very weak subject matter requirements.</i>
	<b>Response from Commission</b> – The Preconditions specifically mention <i>the California K-3 Student Content Standards and Frameworks</i> as well as the <i>Preschool Learning Foundations</i> as required foundational content the program must include. These references are consistent with the ECE publications from the California Department of Education. The national frameworks and the <i>California Early Childhood Educator Competencies</i> were used as reference materials along with the <i>California K-3 Student Content Standards and Frameworks</i> as well as the <i>Preschool Learning Foundations</i> in the development of the <i>Teaching Performance Expectations (TPEs)</i> referenced in 80067.3. Program Standards 1 and 3, Program Design and Curriculum, and Clinical Practice, specifically state that the program’s curriculum must include coverage of and preparation in the <i>California K-3 Student</i>

	<p><i>Content Standards and Frameworks as well as the <b>Preschool Learning Foundations and Curriculum Framework.</b></i></p> <p>The 24 units of Early Childhood Education (ECE)/Child Development (CD) required to meet the subject matter competence requirement are consistent with subject matter requirements for other credential areas. ECE/Child Development Programs organized and offered by California’s four higher education systems (California Community Colleges, California State University, University of California, and Independent California Colleges and Universities) do not necessarily share common course titles or common content within the multiple courses across these four systems, and these courses and title can change over time. Given this context, it is not practicable or possible for the Commission to specify names of individual specific courses for this purpose. All ECE/CD courses, however, must address the core content of early childhood education and child development and must be offered for degree-applicable credit by a regionally accredited institution of higher education. Classroom practice is also addressed not only by coursework but also by the required fieldwork and clinical practice experiences all teacher candidates must complete within the teacher preparation program sequence, and which are specifically referenced in the program standards in 80067.2.</p> <p><b><i>No changes to the proposed regulations are recommended.</i></b></p>
<p>2. 80067.3. TPEs not developmental or play-based enough</p>	<p><b>Main concern</b> – How well teacher training will serve the ECE age group in the classroom; not enough emphasis on play-based pedagogy; not enough detail about how students will be evaluated/assessed in the classroom in an age-appropriate way.</p> <p><i>Sample Comment # 1 - There is limited reference to the critical idea that interactions, connections and engagement with families provide much needed support for children’s learning and positive educational outcomes. (e.g., TPE 1.3 does not mention families)</i></p> <p><i>Sample Comment # 2 -Lack of accountability in qualifying developmentally inappropriate TPE alignment and assessment.</i></p> <p><i>Sample Comment # 3 -This certification program does not specifically address the developmental/ learning needs of children ages four to eight, as it does not contain learning objectives and exercises that identify and develop language skills needed to succeed at later levels.</i></p> <p><i>Sample Comment # 4 -As NAEYC's position statement on developmentally appropriate practice states, "This position statement highlights the importance of learning experiences that are meaningful</i></p>

	<p><i>to each child and that provide active engagement through play, exploration, and inquiry in ways that support the whole child—socially, emotionally, physically, and cognitively. Yet such opportunities are too often denied to young children when educational practices are not responsive to their developmental, cultural, and linguistic characteristics."</i></p>
	<p><b>Response from Commission</b> –The proposed requirements for the PK-3 ECE Specialist Instruction Credential were developed with the advice of an advisory panel composed of ECE experts in the field. Members of the ECE expert advisory workgroup were appointed by the Executive Director following a public application process. The advisory workgroup included 7 ECE practitioners from local school districts; 13 ECE faculty from a variety of institutions of higher education – all content experts in ECE; 8 ECE employers -including at least 5 of whom are also ECE practitioners/experts; and 5 ECE professional organizations in the field, whose representatives are also all ECE experts/practitioners. These content experts provided their knowledge and experience to focus on developmentally appropriate practices informing the proposed credential requirements, program standards, and teaching performance expectations included in the proposed regulations.</p> <p>Following public comment as well as discussions during the October and December 2022 Commission meetings, the draft TPEs were modified to increase the specific references to play-based activities. The TPEs now include six specific references by name to play-based activities (TPEs 1.7, 3.1, 3.2, 4.2, 7.4, 8.5). The number of times a specific concept or theme is mentioned in the TPEs does not have any relationship to its importance or to how much attention is paid to the concept or theme within the teacher preparation program, since all TPEs are required to be fully addressed within the teacher preparation program regardless of the number of times a given concept or theme is mentioned within the applicable set of TPEs for the credential sought.</p> <p>Family engagement references were also increased following public comment and Commissioner input, and this concept is specifically referenced nine times throughout the set of TPEs (1.5, 2.3, 2.4, 4.3, 4.8, 5.7, 6.2, 6.4, 8.8).</p> <p>The TPEs also reference developmentally appropriate practice as well as the social, emotional, and physical growth and development of young children (TPEs 1.1, 1.7, 2.1, 2.5, 2.6, 2.7, 3.1, 3.6, 4.1, 4.2, 4.5, 4.7, 5.6, 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 8.1, 8.4, 8.5).</p>

	<p>The Commission does not have the authority to prescribe any particular curriculum, learning objectives and/or exercises to be used with or by students in the public schools.</p> <p><b><i>No changes to the proposed regulations are recommended.</i></b></p>
<p>3. Perception of poor utilization of public input in the pre-work stages of the regulation</p>	<p><b>Main concern</b> – Commission highlighted primarily positive feedback from field; Commission did not offer to allow public comments on webinar events. Some individuals within the CCC’s feel like they were largely left out as stakeholders in this process, in favor of four-year institutions.</p> <p><i>Sample comment # 1 - The current system for comment and complaint registration lacks opacity and makes it difficult to respond in a timely manner. Also, all commission meetings should be live streamed with a method for remote attendees to speak directly with policymakers.</i></p> <p><i>Sample comment # 2 - “It seems most of this conversation has taken place at a time when these stakeholders could not be present as they were in survival mode with their own programs on the front lines of essential services.”</i></p> <p><b>Response from Commission</b> – All Commission meetings are available live streamed to the public and the web link to watch the meeting live as well as how to make public comment during the meeting is posted with the meeting notice on the Commission’s website. Public comment is specifically and explicitly provided for at all Commission meetings, with directions as to how to submit public comments both in writing and in person or remotely via technology during Commission meetings included in the public meeting notices published on the Commission’s website. The instructions for making public comment during the Commission meetings are also reviewed orally during the meetings by the Chairs facilitating each of the committee agendas.</p> <p>Public comment was also explicitly provided for during the meetings of the Advisory workgroup that assisted in the development of the PK-3 ECE Specialist Instruction Credential requirements, program standards, and teaching performance expectations. Any member of the public attending these meetings had the opportunity to make public comment during one or more dedicated time periods for public input during the meetings.</p> <p>The development of the PK-3 ECE Specialist Instruction Credential was moved forward as expeditiously as possible given California’s teacher shortage and the urgent need for additional teachers to teach in TK</p>



	<p>classrooms as well as other elementary grades as part of the state’s UPK implementation.</p> <p>Webinars and other public engagements where slide presentations were provided are also archived on the Commission’s website for viewing by members of the public. Samples of these webinars and slide presentations can be accessed via links provided in <a href="#">Appendix A</a>.</p> <p><b><i>No changes to the proposed regulations are recommended.</i></b></p>
<p>4. Inclusivity for students starting their ECE education at CCC</p>	<p><b>Main concern</b> – There is some concern about pathways, including collective pathways to teaching credentials, for California Community College (CCC) students. There’s a perception among CCC faculty and students that the credential is more favorable for students from 4-year IHEs.</p> <p><i>Sample comment - The community college AS-T degree clearly defines the courses that meet the transfer requirements. Analysis of the content and experiences included in these courses provides a reference for inclusive requirements.</i></p> <p><b>Response from Commission</b> – Coursework from the California Community Colleges is accepted within the proposed regulations for meeting the 24 units of Early Childhood Education/Child Development for the subject matter requirement for the PK-3 ECE Specialist Instruction Credential, as well as for providing candidates with Clinical Practice experience via Practicum courses offered by the California Community Colleges. Coursework offered by the California Community Colleges via the AS-T (associate degree for transfer) process are also acceptable for providing undergraduate level preparation in support of preparation for the PK-3 ECE Specialist Instruction Credential. Only four-year regionally accredited institutions of higher education offer a baccalaureate degree and a Commission approved educator preparation program, Both a baccalaureate degree as well as completion of a teacher preparation program are statutory requirements for all California teaching credentials. Thus, candidates who may choose to begin their preparation for the PK-3 ECE Specialist Instruction Credential at a California Community College must complete their credential preparation program at a four-year institution of higher education approved by the Commission.</p> <p><b><i>No changes to the proposed regulations are recommended.</i></b></p>

<p>5. Too much like Multiple Subject credential</p>	<p><b>Main concern</b> – There should be more of a focus on foundational development for children.</p>
	<p><i>Sample comment # 1 - Why replicate information from the Multi-subject Credential? Almost all elementary school teachers are not versed in brain research or development in general because it is not required of them to teach. This gap in understanding has been more and more obvious in the way that they have been teaching for some time. The results are children who are stressed, over tested and illiterate.</i></p> <p><i>The more the state of California this past century has changed requirements and standards, the less prepared children and teens are when they get out of school. Everyone is rallying around making sure there is reading, writing and math skills by 3rd grade, yet no foundation is set for the preparation of that. This Pk - 3 Credential is just supporting that even more.</i></p> <p><i>Sample comment #2 - The PK-3 ECE credential is not a reimaged credential but a push down of the multiple subject credential. TPEs 1-5 for the PK-3 credential were written as a modification of the multiple subject credential and do not represent research in the field of early childhood education or ECE national standards. Many Early Childhood professionals on various PK-3 ECE workgroups expressed extreme frustration at the way the workgroups were designed and how the result of the workgroup process did not relate to what they had recommended. Instead, the requirements were written by a small group of CTC staff that did not appear to be trained/experience teaching in ECE or experience at creating ECE curriculum in higher education or dealing with the institutional approval process or obstacles.</i></p>
	<p><b>Response from Commission</b> – As explained in #1 and #2 above, preparation program standards and performance expectations for candidates have a strong emphasis on the <i>Preschool Learning Foundations</i> and child development, and they are based on national frameworks and the <i>California Early Childhood Educator Competencies</i>. This credential is intended to cover the entire span of PK-3, so there are necessary overlaps with the Multiple Subject credential, which authorizes service in grades PK-12.</p> <p>The members of the ECE Credential workgroup represented content experts in the field of early childhood education, including seven ECE practitioners from local school districts; thirteen ECE faculty from a variety of institutions of higher education – all content experts in ECE; eight ECE employers -including at least five of whom are also ECE</p>

	<p>practitioners/experts; and five ECE professional organizations in the field, whose representatives are also all ECE experts/practitioners. These content experts provided their knowledge, experience, and expertise to focus on developmentally appropriate practices informing the proposed credential requirements, program standards, and teaching performance expectations included in the proposed regulations. Developmentally appropriate practices in early childhood education are included throughout the Teaching Performance Expectations for the PK-3 credential (TPEs 1.1, 1.7, 2.1, 2.5, 2.6, 2.7, 3.1, 3.6, 4.1, 4.2, 4.5, 4.7, 5.6, 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 8.1, 8.4, 8.5).</p> <p>In compliance with the provisions of SB 488, the PK-3 ECE Specialist Instruction Credential TPEs have also been updated to focus on early literacy consistent with the principles of scientifically based reading instruction. TPE 7 in particular sets a foundation for the preparation of young children’s reading, writing, listening, and speaking literacy skills. Program standard 7 specifies in detail the knowledge and skills relating to early literacy. In addition, the PK-3 ECE Specialist Instruction credential program standard 8 as well as TPE 8 are specifically focused on developmentally appropriate principles and practices of early mathematics teaching and learning.</p> <p><b><i>No changes to the proposed regulations are recommended.</i></b></p>
<p>6. TPE Differentiation</p>	<p><b>Main concern</b> – The Teaching Performance Expectations (TPEs) should be more fully differentiated for candidates completing a 2-year, 4-year, or graduate degree.</p> <p><i>Sample comment # 1 - Differentiate more fully the differences between TPE expectations at the 2 year, 4 year, and master levels. This should be based on the California Preschool Foundations - based on the research done for the learning foundations or eliminate TPE’s for 2 - 5 (this is based on research, evidence from field experts.)</i></p> <p><b>Response from Commission</b> – The Commission has already differentiated TPEs for 2-year degree candidates who are pursuing a Child Development Permit. The TPEs for 4-year and graduate level candidates, which are part of this rulemaking, cannot be differentiated because candidates at both levels are earning the same credential and must meet the same expectations.</p> <p><b><i>No changes to the proposed regulations are recommended.</i></b></p>

<p>7. Subject Matter Requirement is weak</p>	<p><b>Main concern</b> – An individual could meet the subject matter requirement with only 3 units of child development coursework.</p> <p><i>Sample comment - However, there is a second option for the PK-3 credential that diminishes child development as the subject matter and, in fact, there are ways using this option that someone with only 3 units of child development can receive the PK-3 ECE credential. This option has no assessment of the candidate’s knowledge in the subject matter. Other credentials such as the multiple subject credential, require liberal studies or liberal arts baccalaureate and offer no other direct pathway. Instead, the multiple subject credential requires alternative assessment opportunities instead of weak alternative pathways.</i></p> <p><b>Response from Commission</b> – The proposed regulations allow for only two ways to meet the subject matter requirement – 1) holding a bachelor’s degree or higher with a major in Child Development, Child and Adolescent Development, Human Development, or Early Education or 2) the 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.</p> <p><b>No changes to the proposed regulations are recommended.</b></p>
<p>8. Access to public comments unavailable</p>	<p><b>Main concern</b> – The public no longer has access to public comments made during the development of the credential.</p> <p><i>Sample comment - Once they close public comments, they are required to leave them up, so the public continues to have access to what was submitted.</i></p> <p><b>Response from Commission</b> – Public comment submitted in response to agenda items are published on the Commission website as part of the official agenda record. These comments remain available for review by the public.</p> <p>Public comments submitted as part of Commission workgroup activities are summarized in Commission agenda items reporting on this work.</p> <p>Informational webinars are not part of the official rule making process, so participant chats and comments are not considered “public comments” for the purpose of rulemaking.</p> <p><b>No changes to the proposed regulations are recommended.</b></p>

<p>9. California Community Colleges</p>	<p><b>Main concern</b> – Community college programs were stigmatized, and their faculty not listened to.</p> <hr/> <p><i>Sample Comment - Stigmatizing Community Colleges as having inferior programs. Ignoring the contributions of Higher Education Faculty who have a strong foundation and expertise in Early Learning</i></p> <hr/> <p><b>Response from Commission</b> – The California Community Colleges play a fundamental and critical role in the development and preparation of the early childhood workforce.</p> <p>Coursework from the California Community Colleges is recognized for meeting the subject matter requirement, and staff request that the Commission also recognize in the proposed regulations practicum hours completed at Community Colleges as counting towards meeting clinical practice requirements for the PK-3 ECE Specialist Instruction credential.</p> <p>In addition, 13 faculty members, including from the California Community Colleges, served on the PK-3 Credential Advisory workgroup that developed the requirements for the PK-3 ECE Specialist Instruction credential. In addition, a liaison representative from the California Community Colleges Chancellor’s Office also attended the Credential Advisory workgroup meetings.</p> <p>As part of the public input activities during the development of the PK-3 ECE Specialist Instruction credential, as reported on in the agenda items cited in Appendix A, there were also public forums and opportunities for the participation of Community College faculty.</p> <p><b><i>No changes to the proposed regulations are recommended.</i></b></p>
<p>10. Misinformation</p>	<p><b>Main concern</b> – Staff may have omitted comments, which could have biased Commissioners’ decisions</p> <hr/> <p><i>Sample comment - Misinformation provided to CTC is a concern. After the forums on the PK-3 Credential, CTC staff only presented selected messages from the forums. For instance, when the forum participants were asked, “What are you excited about this credential?” The most answered response was “nothing” in the three forums I attended. However, the staff only reported words like “professionalizing the field.” They selectively left out the negative comments and when we asked them why they did not present the negative results at the commission meeting, the staff said, “We wanted to put a good spin on the work.” That is not how data is presented in the professional world</i></p>

	<p><i>and may have biased the commissioner’s decision to approve the requirements.</i></p> <p><b>Response from Commission</b> – Commission staff presented all data to the Commission in the report on the forums, including that “Nothing” was a response at some the forums to the question posed.</p> <p><b><i>No changes to the proposed regulations are recommended.</i></b></p>
<p>11. No ECE TPA</p>	<p><b>Main concern</b> – Not offering a TPA that would measure these PK-3 ECE TPEs creates chaos in designing programs.</p> <p><i>Sample Comment - Requiring higher education to start preparing PK-3 ECE credential candidates with the new PK-3 ECE TPEs and not offering a TPA that would measure these PK-3 ECE TPEs creates chaos in designing programs. We have been told to use the multiple subject TPA to measure the PK-3 ECE TPEs. That either means that the PK-3 ECE TPEs are so similar to the multiple subject TPEs, or the expectation is that the candidates will be educated in the multiple subject TPEs. This creates such confusion for the students and our preparation programs.</i></p> <p><b>Response from Commission</b> – Preparation programs are designed to meet the Commission-approved program standards and to prepare candidates toward mastery of the Teaching Performance Expectations (TPEs) for each respective credential. They are not designed specifically to meet a Teaching Performance Assessment (TPA) because a single assessment cannot and is not designed to measure all of the TPEs and because there are currently three different TPA models approved for use.</p> <p>The Commission believes that all teacher candidates should be prepared in a common trunk of TPEs plus additional TPEs specific to the credential.</p> <p>While the PK-3 ECE Teaching Performance Assessment is being developed, it is reasonable for candidates to use a Multiple Subject TPA because the PK-3 and Multiple Subject credential share a common trunk of TPEs and since the Multiple Subject TPAs have been validated for use in Kindergarten through grade 3.</p> <p><b><i>No changes to the proposed regulations are recommended.</i></b></p>
<p>12. Lack of transparency</p>	<p><b>Main concern</b> – The process lacked transparency that is required for a government agency to follow.</p>

	<p><i>Sample comment - The lack of transparency that is required for a government agency to follow.</i></p> <hr/> <p><b>Response from Commission</b> – All Commission meetings are open to the public and are fully transparent as to Commission discussion and any actions taken during the meeting, including with regard to the development of the PK-3 ECE Specialist Instruction credential. The public is allowed to participate either at the Commission’s office in Sacramento or online via Zoom. All Commission meetings are compliant with Bagley-Keene requirements.</p> <p>The meetings of the PK-3 Credential Workgroup were also open to the public, and several members of the public regularly attended those meetings. There was a dedicated public comment period during each of the PK-3 Credential Workgroup meetings as well.</p> <p><b><i>No changes to the proposed regulations are recommended.</i></b></p>
<p>13. Developmentally inappropriate credential</p>	<p><b>Main concern</b> – The credential is not developmentally appropriate.</p> <hr/> <p><i>Sample comment - Creating a developmentally inappropriate credential that does not serve our children 0 – 8.</i></p> <hr/> <p><b>Response from Commission</b> – The ECE Credentialing Workgroup focused on creating an early childhood credential built on a foundation of developmentally, linguistically, culturally, and instructionally appropriate practices. Within the TPEs, developmentally appropriate practice is mentioned multiple times across the six domains. Developmentally appropriate practices are mentioned throughout the range of the set of program standards as well. The ECE practitioners on the ECE Credentialing Workgroup were experts in developmentally appropriate practices, including in particular early literacy and early mathematics. In addition, in response to prior public comments, the TPEs were modified to add additional references to play-based approaches that also reflect developmentally appropriate practices in early childhood education. The scope of the credential is preschool through grade 3 and is not intended to serve infants and toddlers.</p> <p><b><i>No changes to the proposed regulations are recommended.</i></b></p>
<p>14. Belittling Language</p>	<p><b>Main concern</b> – Language used regarding the credential belittled early learning and care professionals.</p> <hr/> <p><i>Sample comment - “The proposed PK - 3 ECE Specialist Credential has been intentionally designed to recognize and provide pathways for those who hold a bachelor’s degree and have already gained experience and expertise in early childhood education through their</i></p>

	<p><i>work in programs with California’s mixed delivery early childhood education system (e.g., California State Preschool Programs, Head Start, private preschools and others), to have an expedited pathway to earning the credential and beginning to teach in the PK-3 environment.”</i></p> <p><i>Not only does this statement label the preferred and most understood environments of the writers (CSPP, Head Start, private preschools), the lack of understanding that the overwhelming majority of children are in community based private programs, religious based programs, family child care homes, and kinship care. The second and most demeaning statement in the paragraph, and a direct link to the attitude with which the CTC has carried out the creation of the proposed PK-3 ECE Specialist Credential is found in the last seven words: “...beginning to teach in the PK-3environment.”</i></p> <p><i>This underlying disdain, misunderstanding, and hierarchical thinking is clearly displayed. The intention and understanding in this line is that all of those other environments are not teaching, they are something else, less than.</i></p>
	<p><b>Response from Commission</b> – The credential has primarily been designed to address the need for new teachers required by the implementation of universal TK and to compliment current efforts by the California Department of Education to create a more developmentally appropriate experience for students as they move from PK through third grade.</p> <p>Because the Education Code requires all credential holders to possess a bachelor’s degree or higher, current PK teachers who hold an associate or bachelor’s degree or higher are an important pool of potential TK teachers, who have already met some of the requirements. Since many of them are already teaching 4-year-olds, a purposeful effort was made to make the PK-3 credential attainable by them.</p> <p>No disrespect was meant to professionals who are already working in early learning and care.</p> <p><b><i>No changes to the proposed regulations are recommended.</i></b></p>
<p>15. Misleading and Unrealistic Expectations</p>	<p><b>Main concern</b> – The Commission has created misleading and unrealistic expectations regarding how quickly current teachers can earn the credential.</p> <p><i>Sample Comment #1: The Notice of Intent goes on to say that “The PK – 3 ECE Specialist Credential would also provide accelerated pathways</i></p>



*for current Multiple Subject Credential holders as well as Child Development Teacher Permit (CDP) holders with a bachelors [sic] degree to earn the credential and begin serving as quickly as possible in UPK/UTK settings.”*

*The state requirement is 24 ECE units for multi-subject credentialed teachers. This is one year of full-time coursework. Since it can be assumed these teachers will be working full time, it is an unrealistic expectation to take more than one or two classes per semester. I am currently involved in a TK Cohort that our college established with a local school district. We developed an accelerated pathway to support the district and the teachers who wanted to teach in a TK classroom. I have taught 2 of the courses that they are taking. The feedback that we are getting is that they are overwhelmed, not supported by their district administration to implement what they are learning in our courses, and they do not have the adequate time to truly reflect on what they are learning to create an environment that supports their early learners. In addition, the feedback that we have received is that the administration is more concerned about meeting the 24-unit requirement and less concerned with adjusting the curriculum to support the holistic development of the 4-year-old in that setting.*

*What is more troubling about the proposal here is the portion that states “...Child Development Teacher Permit (CDP) holders with a bachelor’s degree to earn the credential...” Certainly, there needs to be an accessible pathway for these teachers as well. However, if the intention is that these teachers go through a credentialing program, that is 18 months to two years of full-time coursework not counting student teaching, it is unrealistic to think of this timeframe as “quick”. Again, these individuals are likely working full time so a credentialing program coursework is likely to take at least twice that amount of time. The idea of “quickly” is again thwarted with this proposed pathway.*

*Using quick as an incentive, is a disservice to our field. There is nothing quick about creating high-quality teachers who are well equipped to meet the needs of the diverse population of children served in California’s educational system. While the language of the proposed credential speaks about equity, diversity, anti-racism, and inclusion, the use of these terms is more performative and not what needs to occur to be transformative. We have lived through 3 years of trauma due to the COVID 19 pandemic and have learned a lot about our educational system. We have the opportunity to do something to change outcomes for children and families. Quick is never a solution in accomplishing meaningful change.*

	<p><b>Response from Commission</b> – Teachers who already hold a bachelor’s degree and a Child Development Permit at the Teacher level will be able to complete an internship program, allowing them to complete a PK-3 credential program while serving as the teacher of record. Since they have already met the subject matter requirement, they may be able to complete the Early Completion Option and finish in less than the normal two years.</p> <p>Teachers who hold a Multiple Subject credential may already have completed some coursework toward the 24 unit requirement as part of their credential program (e.g., child or human development).</p> <p>The commenter indicated concerns about a lack of support among school administrators for developmentally appropriate programming for 4-year-olds. Professional development for practicing school administrators is outside the authority of the Commission but is within the purview of the California Department of Education, which is investing in professional development for administrators to help ensure that TK programs are developmentally appropriate.</p> <p><b><i>No changes to the proposed regulations are recommended.</i></b></p>
<p>16. Home languages of students</p>	<p><b>Main concern</b> – The credential does not require candidates to learn the home languages of students.</p> <p><i>Sample comment:</i></p> <p>1. <i>As a Latina early educational worker I believe that it is important for the child to practice the parent/s language if it’s Spanish because that is in our culture. It is important for our children to learn our language at home and school when it’s offered by a Latina teacher.</i></p> <p>2. <i>As a parent I find it unfair that the credential isn’t willing to practice languages with our children. I find it to be disrespectful because they are trying to dismiss our cultures from our children. There should be Spanish or different language classes for our children to learn.</i></p> <p>3. <i>As a grandmother I would love for my grandkids to learn and be able to speak their language wherever they go. I would love for them to learn at school more and more and be exposed to other cultures. Have a day or a week for culture day.</i></p> <p><b>Response from Commission</b> – While the credential requirements do not require candidates to learn one or more home languages of students, they do require every candidate to earn an English Language authorization within their teacher preparation program so that they are trained to support students whose home language is not English. The TPEs for the PK-3 ECE Specialist Instruction credential also support</p>

	<p>the promotion and development of the home language wherever possible and encourage parents and families to maintain and use their home language with their children.</p> <p><b>No changes to the proposed regulations are recommended.</b></p>
<p>17. Scoring of the Teaching Performance Assessment</p>	<p><b>Main concern</b> – Local scoring of the TPA will result in inconsistent results.</p>
	<p><i>Sample comment - page 15 under 6A: Administration of the Teaching Performance Assessment (TPA)</i></p> <p><i>The “local scoring option” eliminates the idea of “consistent educator assessments and examinations”. If there is to be consistency, then all locales must be held to the same scoring process.</i></p>
	<p><b>Response from Commission</b> – In practice, all qualified faculty from teacher preparation programs statewide who will serve as scorers of the TPA will receive the same training to understand and apply the scoring scales accurately and appropriately to candidate TPA responses, eliminate or minimize to the extent possible any potential bias within the scoring process, and to be calibrated so that candidates will be scored fairly and equitably across the range of scorers. “Local scoring option” means that programs may choose to have only their own faculty who are trained as scorers as described above score their candidate’s TPA responses. This process supports and helps maintain standards of scoring consistency across programs and candidates.</p> <p><b>No changes to the proposed regulations are recommended.</b></p>
<p>18. “Push down” of K-5 into ECE</p>	<p><b>Main concern</b> – That policies, procedures, and practices applicable to grades K-5 are being replicated/required in grades PK/TK.</p>
	<p><i>Sample comment - Secondly, the current TPEs and Standards are a clear push-down of K-5 into early childhood. Again, with the lack of knowledge and understanding of early childhood education and pedagogy, this push-down will not create qualified teachers.</i></p>
	<p><b>Response from Commission</b> – The members of the ECE Credentialing Workgroup represented experts in the ECE field who consciously and deliberately focused on assuring that the TPEs developed for this credential were focused on a wide range of developmentally appropriate practices for young children. The group discussed the issue of potential “push down” of teaching and learning approaches and practices into the PK/TK grades and kept that issue in mind during each workgroup session. The TPEs as well as the program standards reflect numerous instances where developmentally appropriate</p>

	<p>practices are indicated as required for candidates to learn and to practice during their preparation program. The Literacy TPEs (TPE 7) and Literacy Program Standard 7 as well as the Mathematics TPEs (TPE 8) and Mathematics Program Standard 8 were also deliberately crafted to reflect developmentally appropriate practices in these foundational content areas.</p> <p><b>No changes to the proposed regulations are recommended.</b></p>
<p>19. Barriers for candidates</p>	<p><b>Main concern</b> – There are barriers for experienced preschool teachers to be able to teach in PK-3 in the public schools.</p> <p><i>Sample comment - Third, there are so many barriers and inequities with this new credential. Currently, most preschool teachers are much more diverse and represent the children that they serve, while K-5 teachers are not diverse nor do they represent the BIPOC children they serve. Current lead preschool teachers (many holding a master’s degree) are told they are not qualified to teach TK. These teachers have been teaching 4-year-olds for many years and are much more qualified than the multiple subjects 3rd-grade teachers. Yet, this preschool teacher must go back and apply to be in a credential program while the 3<sup>rd</sup>-grade teacher can take 24 online community college units that have nothing to do with teaching.</i></p> <p><b>Response from Commission</b> – California state statute requires teachers in the public schools to hold a valid appropriate teaching credential for their job role. Lead preschool teachers, even with a master’s degree and/or experience, are subject to the provisions of state statute and must hold a valid teaching credential to serve as the teacher of record in a California public school PK-3 classroom. The Commission does not have the authority to waive state statute.</p> <p><b>No changes to the proposed regulations are recommended.</b></p>
<p>20. Field input ignored</p>	<p><b>Main concern</b> – That the Commission has ignored input from the field.</p> <p><i>Sample comment - Finally, those of us in the early childhood education field have participated in various CTC workgroups, design teams, focus groups, and the like. We have offered expertise in these endeavors and often that expertise has been ignored.</i></p> <p><b>Response from Commission</b> – Commission staff acknowledge and greatly appreciate the multiple contributions of time and expertise graciously and enthusiastically provided by members of the ECE community throughout the development of the PK-3 ECE Specialist Instruction credential. Input from ECE groups and individuals in the field have been reflected in the edits made over time to the TPEs and</p>

	<p>the program standards, as has been reported in multiple prior Commission agenda items and are also reflected in the proposed amendments and modifications to the regulations presented in this agenda item. It is not always possible to incorporate every piece of input as provided by interested members of the ECE community and/or the public as these diverse viewpoints can sometimes be contradictory or inconsistent and the Commission must find a way to reconcile these differing viewpoints and move the work forward. Sometimes input may be received from the field that is also outside the purview of the Commission, or that may be in conflict with the provisions of statute. All public input, however, is heard, considered by the Commission as well as by members of any related content expert advisory group in that area, and reported to the Commission via agenda items and other public communications.</p> <p><b><i>No changes to the proposed regulations are recommended.</i></b></p>
<p>21. Lack of respect for experts in the field</p>	<p><b>Main concern</b> – That the Commission does not respect experts in the field.</p> <p><i>Sample comment - With so much funding and work given to CTC yet no one that participates in CTC design teams is paid showing a lack of respect for our expertise.</i></p> <p><b>Response from Commission</b> – State statute under EC 44280 prohibits the Commission from paying individuals who voluntarily serve as content area experts on Commission advisory workgroups and panels for the development of standards and examinations. However, the Commission can pay for related travel expenses and for a substitute if needed for the content area experts serving on these workgroups and panels as needed. The lack of payment for these professional contributions does not reflect in any way a lack of respect on the part of the Commission for the knowledge, expertise, and time of these content area experts.</p> <p><b><i>No changes to the proposed regulations are recommended.</i></b></p>

**Table 2. Recommended Changes to the Regulations**

Recommendations	Details
<p>1. Have only one required clinical practice placement</p>	<p><b>Main recommendation</b> – Have only one required clinical practice placement</p> <p><i>Sample comment #1 - Remove the requirement in 80067.2(c) (Program Standard 3) for two different placements for clinical practice and allow for a single clinical practice experience in any of the grades PK-3. Far</i></p>

*too often, well-intended policies “do more harm than good,” and this dual placement requirement is one of those. While consistent with the recommendation of the work group, such a requirement represents a large barrier to this credential. This barrier far outweighs the benefit a credential candidate would receive from a dual clinical placement requirement.*

*Sample comment #2 - Modifying CCR 80067.2 (c)(1) (Program Standard 3: Clinical Practice: Opportunities to Learn and to Practice) as follows: Residency program pathway must may have experiences in a different grade level than which they are doing their residency placement. Some residents may have their clinical placements in combination TK/K classrooms, as proposed, a resident would be required to serve in another setting. Children Now supports waiving the dual clinical practice placement requirement of all candidates for the PK-3 ECE Specialist Credential.*

*Sample comment #3 - One consideration we would like to raise is how to make the credential more accessible to current early educators, especially those with preschool teaching experience who would like to teach TK on an intern credential. These candidates would still need to complete at least 200 hours of clinical practice in a K-3 classroom in addition to meeting the clinical requirements for teaching in preschool or TK settings through their place of work...*

*If the commission is concerned about extending the ability to teach in higher grades to candidates without commensurate clinical experience, a potential solution might be offering a specialization within the PK-3 credential that authorizes the holder to teach only in grades pre-K, TK, and Kindergarten.*

**Response from Commission** – The PK-3 Credentialing Workgroup strongly felt that to support developmentally appropriate practice in early childhood settings two placements are needed for credential candidates. The PK/TK curriculum and developmentally appropriate teaching and learning practices are based in the *Preschool Learning Foundations and Frameworks*, whereas the curriculum in grades K-3 is based in the student standards adopted by the State Board of Education.

To address this recommendation, this item proposes that the Commission consider adopting proposed modifications outlined on pages 4-5 to subsection 80067(a)(1)(C) and section 80067(f) including subsections (f)(1) through (5) to reconfigure the clinical practice hours and to create a separate PK-K authorization. This would allow

	<p>candidates to complete clinical practice in PK-K and earn an authorization for those grade levels.</p> <p><b><i>Changes to the proposed regulations are recommended.</i></b></p>
<p>2. Add apprenticeship as a professional program model</p>	<p><b>Main recommendation</b> – Apprenticeships should be added as an approved model for professional programs.</p>
	<p><i>Sample comment - Teacher Apprenticeship Preparation Programs should be included in the list of professional program models outlined in CCR 80067(c). While still in development, this program model can be added now by adding (6) Other teacher preparation program model accredited by the Commission on Teacher Credentialing for the issuance of a PK-3 Early Childhood Education Specialist Credential, e.g., teacher apprenticeship preparation programs.</i></p>
	<p><b>Response from Commission</b> – Apprenticeships are not a separate preparation model but rather a form of “earn while you learn” that would make completing a teacher preparation more affordable. Residencies and traditional student teaching could potentially become apprenticeships, but no changes to the regulations are required to allow this.</p> <p>Commission staff are currently part of an interagency workgroup to develop a teacher apprenticeship model for California, and PK-3 preparation programs will be eligible once the model is approved.</p> <p><b><i>No changes to the proposed regulations are recommended.</i></b></p>
<p>3. Require 200 hour clinical practice in PK for candidates who already hold a Multiple Subject Credential</p>	<p><b>Main recommendation</b> – Candidates who already hold a Multiple Subject credential should also have to complete clinical practice.</p>
	<p><i>Sample comment - In CCR 80067 (e), the lack of requirement for a multiple subject credential holder to have a 200-hour clinical practice experience in a preschool setting is inequitable compared to the requirements in CCR 80067 (d), unless the change proposed above to eliminate two placements is removed.</i></p>
	<p><b>Response from Commission</b> – The Multiple Subject credential already authorizes service in PK, so it does not make sense to require clinical practice at a level for which the candidate is already credentialed.</p> <p><b><i>No changes to the proposed regulations are recommended.</i></b></p>

<p>4. Training in the California <i>Preschool Learning Foundations and Frameworks</i></p>	<p><b>Main recommendation</b> – Require that intern candidates receive preservice training in the California Preschool Learning Foundations and Frameworks</p>
	<p><i>Sample comment - Add to CCR 80067.1 (h)(3)(A): 5. California Preschool Learning Foundations and Frameworks.</i></p>
	<p><b>Response from Commission</b> –s 1 and Staff agree with this recommendation, and the recommended language has been added to the proposed regulations.</p> <p><b><i>Changes to the proposed regulations are recommended.</i></b></p>
<p>5. Intern placements</p>	<p><b>Main recommendation</b> – Requiring two placements for interns is challenging.</p>
	<p><i>Sample comment - Clarifying 80067.1(h)(4)(A)2. Will interns also need to be placed outside their classroom of record for clinical practice in order to meet the requirements as currently proposed?</i></p>
	<p><b>Response from Commission</b> – The regulations approved by the Commission in December 2022 require candidates completing an intern pathway to have two placements. For example, Interns could have a second placement as teacher of record in the second grade band (e.g., split schedule or the second placement in summer school).</p> <p>However, if the Commission approves recommendation #3 in this agenda item, which would create a PK-K authorization, then an intern could have a single placement in that grade range.</p> <p><b><i>Changes to the proposed regulations are recommended.</i></b></p>
<p>6. Recognizing Clinical Hours from Practicum Classes towards meeting the 600-hour Clinical Practice requirement</p>	<p><b>Main recommendation</b> – Clinical hours completed during a practicum should count toward required 600 hours.</p>
	<p><i>Sample comment - Please consider honoring the Clinical Hours that students at the community college level have earned in their Practicum classes, for the following reasons:</i></p> <p><i>These Practicum courses offer rigorous practical opportunities that include teaching academic content to children, between infancy through third grade, using a developmentally appropriate approach. At ELAC we provide 108 hours as a requirement for each of our two practicum courses.</i></p>



	<p><b>Response from Commission</b> – Commission staff agree with this recommendation. This item includes regulatory language to implement this request for the Commission to consider on pages 2-3.</p> <p><b><i>Changes to the proposed regulations are recommended.</i></b></p>
<p>7. Align implementation timelines</p>	<p><b>Main recommendation</b> – Align implementation timelines</p>
	<p><i>Sample Comment - Create a timeline for implementation that aligns varying systems in coordination with IHEs that will be implementing.</i></p>
	<p><b>Response from Commission</b> – The Commission has not established a mandatory implementation timeline for any institution of higher education (IHE) relative to the PK-3 ECE Specialist Instruction credential. Developing and implementing a PK-3 ECE Specialist Instruction credential preparation program is a voluntary choice for IHEs, and no IHE is required to develop or offer such a program. IHEs that are voluntarily choosing to develop and implement a PK-3 ECE Specialist Instruction program may do so at their own pace. The Commission accepts program proposals from IHEs throughout the year. The Commission has no authority over the internal timelines and program development processes of California institutions of higher education.</p> <p><b><i>No changes to the proposed regulations are recommended.</i></b></p>
<p>8. Rewrite the TPEs and convene multiple listening sessions with groups in the field</p>	<p><b>Main recommendation</b> – Create a statewide writing team to revise TPEs and consist of an equal measure of CTC/CDE staff, CC full time faculty, and 4-year full time faculty with additional representation of families and current ECE teachers.</p>
	<p><i>Sample comment # 1 - Convene regional listening sessions and roll out meetings where all ECE professionals are invited to participate in person and via zoom where chat features are on and meeting is recorded and archived on the CTC webpage</i></p>
	<p><i>Sample comment # 2 - Convene regional listening sessions and roll out meetings where all families, local Offices of Education, and other community members are invited to participate in person and via zoom where chat features are on and meeting is recorded and archived on the CTC webpage</i></p> <p><i>Sample comment # 3 - Convene a statewide writing team that consists of an equal measure of CTC/CDE staff, CC full time faculty, and 4-year full time faculty with additional representation of families and current ECE teachers to fully review and revise the proposed legislation and</i></p>

	<p><i>instruction handbook so that it is equitable in language, intention, and process.</i></p>
	<p><b>Response from Commission</b> – The processes described by the commenter are very similar to the processes that have already been conducted during the development of the PK-3 ECE Teaching Performance Expectations (TPEs) since August 2021 and have been reported on in multiple agenda items cited in Appendix A. These processes, input sessions, meetings with various constituencies in the ECE field, and statewide meetings are documented in Appendix A of this agenda item.</p> <p><b>No changes to the proposed regulations are recommended.</b></p>

**Table 3. Comments Received that are Outside the Commission’s Authority or Not Directly Related to the Proposed Regulations**

<p><b>Main concern</b> – Practices in PK-3 classrooms need to be developmentally appropriate, which requires proper training and curricula.</p> <p><i>Sample comment - For this Credential to meet the needs of young children in PK- 3rd grade children, there needs to be a major focus on educating and hiring teachers who understand what developmentally appropriate practice is and what it looks like in the classroom. (This especially means the PK and K curriculum must be play-based, with a balance of child-led and teacher-led activities which are focused on the current interests and needs of the children in each classroom. It means that the CA Preschool Learning Foundations, the CA Preschool Curriculum Frameworks, and the DRPD would be required for any program serving children 3-5. No current published curriculum offers that, nor will any step-by-step program be appropriate.)</i></p> <p><i>There must be the requirement of school district administration to participate in (and then execute at the school level) prolonged training/coaching in Developmentally Appropriate Practice, play pedagogy, etc. conducted by experts in the field.</i></p> <p><b>Response from Commission</b> – The Commission has no authority over the hiring of teachers or their continuing education once credentialed. The Commission has no authority to require credentialed school district administrators to complete any kind of inservice training. The Commission has no authority over the curriculum or assessments used in California public schools.</p>
<p><b>Main concern</b> – The state should fund the cost of completing a credential program.</p> <p><i>Sample comment - All teaching majors need to be fully funded on a per unit basis by the state. This is an equity issue...to encourage more people to go into teaching and to tap populations</i></p>

*that may not be able to spend up to two years without employment doing practicum/student teaching.*

**Response from Commission** – The Commission has no authority to fully fund the cost of completing a credential preparation program.

**Main concern** – Focus should be put on making smoother transition from Community College coursework for earning a Child Development Permit to earning the proposed credential.

*Sample comment - Temporary accreditation (five years?) for all CAP aligned CCs should be granted until a smoother, more appropriate, pathway is created that listens to the expertise of those in the field and addresses barriers. This includes a TMC from the state Chancellor's Office for a transfer degree between 2- and 4-year colleges.*

**Response from Commission** – Temporary accreditation for all CAP aligned community colleges refers to coursework leading to the Child Development Permit that has been approved by the Curriculum Alignment Project (CAP), which is not directly related to the proposed regulations, and the Commission has no authority over transfer degree programs offered by the California Community Colleges or over the Curriculum Alignment Project.

**Main concern** – Institutions of higher education do not have funding to create PK-3 Early Childhood Education Specialist preparation programs.

*Sample comment - Cost to institutions without money tied to funding – Within this proposal, there are expectations for IHE faculty to (at a minimum) recreate courses, programs, reassign responsibilities, hire, train, and purchase equipment, without any mention of funding to pay for all of these requirements (and likely more) all of which are outside of the current responsibilities and budgets. Legal requirements without funding to support those requirements is unacceptable. In addition, there is no evidence of understanding about the college curriculum approval process.*

*At most colleges and universities, it is a minimum of 18 months from the time that program creations/changes are submitted to the time they are approved to be offered. A minimum of 6 months prior is needed to fully understand the needed changes, to analyze current courses and programs, to determine what other degree patterns will be impacted by changes, and multiple consultation with college articulation officers and curriculum committee technical support faculty are all required before actually beginning the process of writing the changes. During this time, presentation/submission of proposed changes must also be approved by each college's CD/ECE/EDU department's advisory boards and submitted to the regional consortium for approval of new programs. These minutes must be submitted as a part of the justification for changes to/creation of coursework and certificate and degree patterns. There is also work of ensuring that CCs and CSUs/UCs or other local 4-year colleges are working together for a streamlined approach for student transfer and success. The state Chancellor's Office has not created a TMC for the PK-3 ECE Specialist Credential which means that there is no guidance or assurance that any degree pattern created at a CC will be accepted at a 4-year college. Most teachers in California began their coursework at community colleges with 65% of CSU graduates entering the University as transfer students and 55% of CSU credential*

*students beginning their college careers at a CA Community College. All of this work, and certainly more, is the minimum that is required to implement the changes proposed in the handbook, all without funding to implement, solidified guidance, or a reasonable timeline for rollout.*

**Response from Commission** – The Commission does not have authority to provide funding to program sponsors to create PK-3 preparation programs except when the Legislature creates grant programs that it assigns to the Commission to award. Since the current state budget was passed in July 2022, Commission staff have been regularly informing program sponsors that the updated [Integrated Undergraduate Teacher Preparation planning grants](#) created in the budget are a funding opportunity for developing PK-3 preparation programs at the undergraduate level.

Offering a PK-3 ECE Specialist Instruction Credential preparation program is optional for any potential program sponsor. There is no obligation and no requirement in the proposed regulations for any institution of higher education to develop or offer a PK-3 ECE Specialist Instruction Credential preparation program. Institutions of higher education wishing to voluntarily offer a PK-3 ECE Specialist Instruction Credential Program may develop and submit an application for review and potential approval of such a program to the Commission at any time, as program applications are accepted and reviewed on a continuous basis throughout the year. Institutions of higher education interested in voluntarily offering a PK-3 ECE Specialist Instruction Credential program may take as long as needed to develop and submit their program application; there are no specific deadlines for submitting a program proposal and proposals are accepted for review throughout the year.

**Main concern** – A diploma in early childhood education should be sufficient.

*Sample comment - I wonder how come it is only having bachelor's degree able to treat early age Childs. I disagree with this statement\*\*\* required bachelor's degree\*\*, an individual who has diploma in early childhood education has better skill for children than the one who use in a subject bachelor's degree. Example let's say if someone has bachelor's degree in management and others have diploma or certificate in early child education. Which one is for pk to 3 grade age children will understand or treat well? The matter is who has equivalent knowledge or skill for those age children.*

**Response from Commission** – The Education Code requires that an individual hold a bachelor's degree or higher in order to earn a credential, therefore the Commission cannot reduce that requirement to an associate degree.

**Main concern** – A universal preschool program in CA will negatively impact the workforce – especially childcare providers (especially private, in-home daycares).

*Sample comment # 1 - This Credential will negatively affect privately owned programs...disproportionately effecting women of color who provide quality home-based childcare programs and businesses to our children and families.*

*Sample comment # 2 - The costs associated with attaining and sustaining certification are prohibitive for operators of home-based childcare and learning facilities. The hours needed*

*place an undue economic strain on facilities such as these in low-income neighborhoods and cities.*

*Sample comment # 3 - This Credential will negatively affect privately owned programs that have already been affected by the current public TK and ETK programs, disproportionately effecting women of color who provide quality home-based child care programs and businesses to our children and families.*

**Response from Commission** – The Commission has no purview or authority over the state’s Universal Preschool (UPK) system, its requirements, or its implementation. The UPK system is within the authority and purview of the California Department of Education.

The PK-3 ECE Specialist Instruction Credential and its requirements pertain only to individuals who are seeking a teaching career in the public schools teaching in grades PK-3. This credential and its requirements do not apply to persons operating a home-based childcare program, private learning facilities and programs, or private in-home daycare services. However, if an individual operating a home-based childcare program holds a bachelor’s degree or higher and wanted to teach in a public school, the individual could complete an internship program, working as the teacher of record while completing a preparation program.

**Main concern** – School districts with low socio-economic statuses will require students to attend public school PK-3 programs, including TK, which will potentially create inequities amongst preschoolers from well-funded areas vs preschoolers from low SES areas. Well-funded students will have more access to private and other ECE programs, compared to their low SES counterparts.

*Sample comment - “Multiple choices are only for families with resources and some school districts are putting pressure on families to send their child to TK.”*

**Response from Commission** – The Commission does not have any purview or authority over the state’s Universal Preschool (UPK) system, its requirements, or its implementation. The UPK system, its requirements and its implementation are within the authority and purview of the California Department of Education.

**Main concern** – A universal preschool program in CA will negatively impact the workforce especially childcare providers (especially private, in-home daycares).

*Sample comment # 1 - This Credential will negatively affect privately owned programs...disproportionately effecting women of color who provide quality home-based childcare programs and businesses to our children and families.*

*Sample comment # 2 - The costs associated with attaining and sustaining certification are prohibitive for operators of home-based childcare and learning facilities. The hours needed place an undue economic strain on facilities such as these in low-income neighborhoods and cities.*

**Response from Commission** – The Commission has no purview or authority over the state’s Universal Preschool (UPK) system, its requirements, or its implementation. The UPK system is within the authority and purview of the California Department of Education.

The PK-3 ECE Specialist Instruction Credential and its requirements pertain only to individuals who are seeking a teaching career in the public schools teaching in grades PK-3. This credential and its requirements do not apply to persons operating a home-based childcare program, private learning facilities and programs, or private in-home daycare services.

**Main concern** – Establish requirements for local education agency implementation of universal TK, and modify requirements for who is allowed to teach TK.

*Sample Comments:*

- *Require LEA’s to have an advisory board across multi systems*
- *Require current Multi-subject credentialed teachers to have 24 units of ECE coursework that does not include loopholes to use coursework earned in their credential.*
- *Provide coaching on site with local Office of Education Early Childhood technical assistance teams or similar Early Childhood experts for no less than one year to all new classrooms serving 3-6 year old children with the focus on developmentally appropriate learning and environments.*
- *Utilize the QRIS system or other nationally recognized early childhood system to establish quality early childhood programming.*
- *Include systems for “grandfathering in” early childhood teachers into the system to be able to be fully recognized teachers in classrooms rather than to be demoted to aide positions.*

**Response from Commission** – The Commission has no authority over the internal processes of local school districts and cannot require LEAs to do as the commenter recommends.

The Commission has no authority to change or modify the provisions of EC 48000 (g) as recommended by the commenter.

The Commission is not staffed to provide onsite coaching to LEAs nor does it have the authority to compel local school districts to offer or participate in such coaching activities as the commenter recommends.

The QRIS system is part of the quality control system overseen by the California Department of Education, not the Commission on Teacher Credentialing.

The Commission does not have the authority to grant credentials to individuals who have not met the statutory requirements for a California teaching credential.

**Main concern** – The 24 unit apportionment requirement was supposed to be temporary, but the regulations make it permanent.

*Sample Comment - First, the 24-unit requirement for the apportionment of funds for Ed Code 48000 was supposed to be temporary. It was extended and now made permanent to satisfy the teachers union and not in the interest of children. The 24 units should sunset so that existing MC credential holders can get some basic understanding of development and teach TK. Option 2 needs to sunset. With option 2, districts want a MS Credential and 24 units which we know is not what is best for the children.*

**Response from Commission** – The Commission does not have purview over requirements enacted in Education Code 48000. The Commission does not have purview over the actions of local school districts. This comment is unrelated to the PK-3 ECE Specialist Instruction credential requirements and proposed regulations.

**Table 4. Comments that are Unclear**

**Comment** - *Protocols have often not been followed and the expertise of the field has been ignored. Systemic barriers are being put in place (and expanded) that will disallow students to complete their education.*

**Response from Commission** – The commenter did not identify protocols that have not been followed, how the field has been ignored, or how the proposed regulations will disallow students from completing their education.

**Comment** - *The requirements of the proposed Credential are inequitable and continue structural and systemic racism - We know that the population of children that will be served by this credential are low-income children of color.*

**Response from Commission** – The commenter did not identify how the requirements are inequitable and continue structural and systemic racism.

**Comments**

*Comment #1 I am writing this letter to express my opposition to how the current TK-3rd grade credential is written for the following reasons:*

- 1. Marginalizing and trivializing our expertise as Early Learning Professionals/Developmentalists*
- 2. Ignoring the contributions of Higher Education Faculty who have a strong foundation and expertise in Early Learning*
- 3. Stigmatizing Community Colleges as having inferior programs*
- 4. Promotion and enhancement of Systemic Racist Barriers to our current BIPOC (Black, Indigenous, People of Color) workforce*

*Please accept this letter and make the necessary reforms so that this credential helps our families, children, and early education workers instead of harming us.*

*Comment #2 I am a Child Development student at West L.A. College and I am writing this letter to you in order to express my opposition to the way the current TK-3rd grade credential is written for the following reasons:*

- 1.- *Stigmatization of community colleges for having inferior programs.*
- 2.- *Create unequal barriers for students to achieve their educational goals.*
- 3.- *Lack of responsibility in the qualification of alignment and evaluation of TPE (Educational Preparation for Teachers) inappropriate for development.*
- 4.- *Do not use public comments to report only favorable comments.*
- 5.- *Sabotage collectivism in the ways of students.*
- 6.- *Create a developmentally inappropriate credential that does not serve our children from 0 to 8 years old.*

*Please accept this letter and make the necessary reforms so that this credential helps our families, children and early education workers, instead of harming us.*

**Response from Commission** – Multiple commenters submitted the identical or virtually identical set of comments. The commenters did not identify how the expertise of early learning professionals, developmentalists, or higher education faculty have been marginalized, trivialized, or ignored. These groups were all included in the membership of the Early Childhood Credential Workgroup. The commenters also did not identify:

- how community colleges are being stigmatized as having inferior programs
- how the regulations promote and enhance systemic racist barriers to the current BIPOC workforce
- what responsibility is lacking in the qualification, alignment, and evaluation of TPEs or how they are inappropriate for development
- what “collectivism in the ways of students” means or how it is being sabotaged
- how the credential is developmentally inappropriate and does not serve children from ages 0-8.

**Comment** - *Creating inequitable barriers for students to achieve their educational goals.*

**Response from Commission** – The commenter did not identify what barriers are being referred to, or how the Commission’s proposed regulations create inequitable barriers for students.



## Appendix C

The Commission on Teacher Credentialing has illustrated changes to the original text in the following manner: text originally proposed to be added is underlined; text proposed to be deleted is displayed in ~~strikeout~~. Text proposed to be amended in this agenda item is shown in double underline for additions and ~~double strike out~~ for deletions.

**CALIFORNIA CODE OF REGULATIONS**  
**TITLE 5. EDUCATION**  
**DIVISION 8. COMMISSION ON TEACHER CREDENTIALING**  
**CHAPTER 1. Credential Issued Under the Teacher Preparation and Licensing Law of 1970**  
**Article 2. Credential Types, Authorizations, and Requirements**

**80067.** Specific Requirements for the Professional Clear ~~PK-3~~ Early Childhood Education Specialist Instruction Credential

~~(a) The minimum requirements for the professional clear Early Childhood Education Specialist Instruction Credential for applicants who complete a professional preparation program in California shall include (1) through (3):~~

~~(1) possession of a valid California Multiple Subject, Standard Elementary or General Elementary Teaching Credential;~~

~~(2) completion of a post baccalaureate professional preparation program accredited by the Committee on Accreditation for the Early Childhood Education Specialist Instruction Credential, including successful completion of supervised student teaching appropriate to the specialization area; and~~

~~(3) the recommendation from a regionally accredited institution of higher education that has a program accredited by the Committee on Accreditation in the professional clear credential sought.~~

~~(b) The minimum requirements for the professional clear Early Childhood Education Specialist Instruction Credential for applicants who complete a professional preparation program outside California shall include (1) and (2). Applicants may apply directly to the Commission for the professional clear Early Childhood Education Specialist Instruction Credential under this section:~~

~~(1) possession of a valid California Multiple Subject, Standard Elementary or General Elementary Teaching Credential; and~~

~~(2) completion of a post baccalaureate professional preparation program comparable to a program accredited by the Committee on Accreditation for the Early Childhood Education Specialist Instruction Credential, including successful completion of supervised student teaching appropriate to the specialization area but taken outside California. The program must be from a regionally accredited institution of higher education and approved by the appropriate state agency where the course work was completed.~~

~~(c) Term.~~

~~The professional clear Early Childhood Education Specialist Instruction Credential issued on the basis of the completion of all requirements shall be dated per Title 5 Section 80553.~~

~~(d) Authorization.~~

The Early Childhood Education Specialist Instruction Credential authorizes the holder to develop and coordinate curriculum, develop programs and deliver staff development including age appropriate teaching methodologies for child development programs and early childhood education programs in grades three and below which are coordinated by school districts or county offices of education. This credential also authorizes teaching courses in child development in grades twelve and below and in classes organized primarily for adults.

(a) Preliminary Credential Requirements: The minimum requirements for the preliminary ~~PK-3~~ Early Childhood Education Specialist Instruction Credential for applicants shall include:

(1) Possession of a bachelor's or higher degree from a regionally-accredited institution of higher education.

(2) Completion of a professional preparation program that:

(A) meets the PK-3 ECE Program Standards and Teaching Performance Expectations (TPEs), including literacy standards and TPEs adopted pursuant to Senate Bill 488, chapter 678, Statutes of 2021,

(B) is approved by the Committee on Accreditation for the ~~PK-3~~ Early Childhood Education Specialist Instruction Credential, and

(C) includes preparation to serve English learners and a 600-hour clinical practice experience with a minimum of 200 hours in a preschool, ~~(PK)~~, and/or transitional kindergarten ~~(TK)~~, or kindergarten (PK-K) setting and a minimum of 200 hours in a ~~kindergarten~~ first, second or third grade (~~1-3~~) setting.

(i) A candidate who does not complete a clinical practice placement in a grade 1, 2 or 3 classroom may earn the authorization outlined in subsection (f)(2) by completing up to 400 hours in a preschool setting and at least 200 hours in a TK or K setting in the context of their professional preparation program.

(3) Passage of a commission approved teaching performance assessment for multiple subjects in a K-3 setting, or passage of a commission approved teaching performance assessment for early childhood education.

(4) Completion of the subject matter requirement by one of the following:

(A) Possession of a bachelor's or higher degree from a regionally accredited institution of higher education with a degree major in the field of child development or early childhood education.

(B) 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.

(5) Passage of either the Reading Instruction Competence Assessment (RICA), or a commission approved literacy performance assessment aligned with the requirements outlined in Education Code section 44320.3.

(b) Clear Credential Requirements: The minimum requirements for the clear ~~PK-3~~ Early Childhood Education Specialist Instruction Credential shall include:

(1) Possession of a preliminary ~~PK-3~~ Early Childhood Education Specialist Instruction Credential issued based on the requirements outlined in section (a).

(2) One of the following:

(i) Enrollment in and successful completion of a commission approved Teacher Induction program, or

(ii) Possession of a valid National Board Early Childhood/Generalist certificate.

A qualified applicant holding a valid clear Multiple Subject, Single Subject, or Education Specialist Teaching Credential who has previously completed a commission approved Teacher Induction program shall, upon completion of a preliminary ~~PK-3~~ Early Childhood Education Specialist Instruction Credential program, be granted a clear ~~PK-3~~ Early Childhood Education Specialist Instruction Credential without first being required to hold a preliminary ~~PK-3~~ Early Childhood Education Specialist Instruction Credential or complete an additional induction experience. Such applicants may apply directly to the commission for the clear credential in the same manner as outlined in subsection (h)(2).

(c) Professional Preparation Program Models: For the purposes of this section, professional preparation programs referenced in subsection (a)(2) may include any of the following program models offered by a commission accredited program sponsor:

(1) Integrated undergraduate teacher preparation program, which may be offered by a regionally-accredited institution of higher education approved by the commission.

(2) Combined community college and baccalaureate or post-baccalaureate teacher preparation program, which may be offered by a regionally-accredited institution of higher education approved by the commission.

(3) Post-baccalaureate teacher preparation program, which may be offered by a regionally-accredited institution of higher education approved by the commission.

(4) Teacher residency program, which may be offered by a regionally-accredited institution of higher education approved by the commission in partnership with one or more LEAs.

(5) Intern teacher preparation program, which may be offered by a California public school, school district or county office of education approved by the commission, or by a regionally- accredited college or university approved by the commission, that shall include the additional requirements outlined in subsection (A) below. Intern programs are a partnership between the commission accredited program sponsor and the California employing agency that elects to employ an individual as the teacher of record on the basis of an intern credential. The requirements outlined in subsections (A)(i), (A)(ii), and (A)(iii) below must be met prior to the recommendation for and issuance of an intern teaching credential by the accredited program sponsor.

(A) Support and Supervision.

(i) Prior to an intern teacher assuming daily teaching responsibilities, a signed Memorandum of Understanding must be in place between the commission accredited program sponsor and the California employing agency detailing the support and supervision that will be provided.

(ii) The commission accredited program sponsor in cooperation with the California employing agency shall counsel the intern candidate and develop a plan to complete the requirements to earn a credential in the content or specialty area(s) of the intern credential. The commission accredited program sponsor, employing agency, and the intern teacher shall concur on the program planned.

(iii) Prior to an intern teacher assuming daily teaching responsibilities, the California employing agency must identify a mentor for the intern teacher that possesses a valid, corresponding life or clear teaching credential and a minimum of three years of successful teaching experience.

(iv) A minimum of 144 hours of support/mentoring and supervision shall be provided to each intern teacher per school year to coach, model, and demonstrate within the classroom, and to assist with course planning and problem-solving regarding students, curriculum, and effective teaching methodologies. The minimum support/mentoring and supervision provided to an intern teacher who assumes daily teaching responsibilities after the beginning of a school year shall be equal to 4 hours times the number of instructional weeks remaining in the school year. A minimum of two hours of support/mentoring and supervision shall be provided to an intern teacher every five instructional days.

(v) The following additional support/mentoring and supervision shall be provided to an intern teacher who enters the program without a valid English learner authorization listed on a previously issued multiple subject, single subject, or education specialist instruction teaching credential; a valid English learner authorization or CLAD Certificate issued pursuant to section 80015; or a valid bilingual authorization issued pursuant to section 80015.1:

a. The commission accredited program sponsor shall provide 45 hours of support/mentoring and supervision per school year, including in-classroom coaching, specific to the needs of English learners. The minimum support/mentoring and supervision provided to an intern teacher who assumes daily teaching responsibilities after the beginning of a school year shall be equal to five hours times the number of months remaining in the school year. The support/mentoring and supervision should be distributed in a manner that sufficiently supports the intern teacher's development of knowledge and skills in the instruction of English learners.

b. The California employing agency shall identify an individual who will be immediately available to assist the intern teacher with planning lessons that are appropriately designed and differentiated for English learners, for assessing language needs and progress, and for support of language accessible instruction through in-classroom modeling and coaching as needed. The identified individual may be the same mentor assigned pursuant to (5)(A)(iii) provided the individual possesses an English learner authorization and will be immediately available to assist the intern teacher.

c. An individual who passes the CTEL examinations specified in section 80015.3(a) prior or subsequent to the issuance of the intern credential may be exempted from the provisions of a and b above.

(d) Professional Preparation Program Equivalency: Commission approved professional preparation programs shall recognize and grant equivalency for prior experience as follows:

(1) ~~PK-3~~ Early Childhood Education Specialist Instruction Credential candidates that meet both the requirements outlined in subsections (A) and (B) below shall be granted equivalence for at least 200 hours of the required clinical practice experience in a PK-K ~~or TK~~ setting and may be granted equivalence for an additional 200 total hours of the required clinical practice experience in a PK-K ~~or TK~~ setting within the program of professional preparation. Such candidates must complete all other program requirements, including a clinical practice experience of at least 200 hours in a ~~K-1-3~~ setting.

(A) Either 1) hold a valid Child Development Permit at the Teacher level or higher, or 2) verify employment as a lead teacher in a Head Start program, or 3) verify employment as a lead teacher in a childcare and development center serving preschool-aged children.

(B) Verify six (6) years or more of satisfactory, full-time teaching experience as a lead teacher in a public or private center-based childcare and development program serving preschool-aged children that is either a license-exempt childcare and development center pursuant to California Health and Safety Code section 1596.792(o) or holds a license as defined in section 101152(l)(1), Article 1, Chapter 1, Division 12, of Title 22.

(i) Satisfactory teaching experience shall be verified by the public or private center-based childcare and development center. Verification shall include a statement by the employer confirming that the teacher's performance was rated satisfactory or better in the following areas:

- The use of developmentally appropriate teaching strategies for preschool-aged children.
- The ability to establish and maintain developmentally appropriate standards and expectations for student behavior.
- A demonstration of deep knowledge of the early literacy, early mathematics, and other preschool subjects, and the use of developmentally appropriate teaching and learning approaches that engage students and promote student understanding.
- An ability to plan and implement a sequence of appropriate learning activities, both teacher and child initiated.
- An ability to evaluate and assess student learning outcomes.
- An ability to communicate effectively with young children and their families/guardians.

(ii) Full-time experience shall be defined as classroom-based teaching for at least ~~four~~ three hours per day, for at least 75% of the school year. Part time

experience, or experience serving as anything other than a lead teacher, shall not be acceptable.

(iii) Lead teacher means an adult who has direct responsibility for the care and development of children from birth to 5 years of age in a center-based early childhood care setting, and serves in a teaching capacity with 3 and/or 4 year olds.

(2) Candidates for the ECE Specialist Instruction who have completed a practicum course at a regionally accredited institution of higher education, including a community college, shall be granted clinical practice equivalency for these hours commensurate with the number of hours served in the practicum course, up to a maximum of 200 hours, provided that all of the following conditions are met:

(A) The practicum course is credit bearing and degree applicable towards a Teacher Level or higher level Child Development Permit or a degree in Early Childhood Education, Child Development, Child and Adolescent Development, or Human Development.

(B) The practicum included clinical practice experience that was supervised at minimum by a trained faculty member/instructor who provided observation and feedback to the candidate.

(C) The candidate earned a C or better on the practicum course. Courses earned with a "Pass," or another designation deemed by the institution of higher education to be equivalent to a grade of "C" or higher are also acceptable.

(D) The candidate provides to the Commission-approved ECE Specialist Instruction program verification of the hours served through transcripts and other documentation as determined by the Commission-approved program.

(3) Candidates who have completed both a verified work experience as outlined in paragraph (d)(1) above and a qualified practicum experience as outlined in paragraph (d)(2) above may be granted a maximum of 400 hours total toward the clinical practice requirement and shall complete the remaining 200 hours of clinical practice in the teacher preparation program.

(e) Multiple Subject Teaching Credential Holder Equivalencies: ~~PK-3~~ Early Childhood Education Specialist Credential candidates that also hold a valid Multiple Subject Teaching Credential with an English learner authorization are exempt from the professional preparation program requirements outlined in subsection (a)(2) and (a)(3) above. Such candidates may apply directly to the commission by submitting all of the following, and may be issued an ~~PK-3~~ Early Childhood Education Specialist Credential with a term of preliminary or clear based upon and in alignment with the term of their valid Multiple Subject Teaching Credential:

(1) Official transcripts verifying completion of the subject matter requirement outlined in subsection (a)(4), and

(2) A competed application as defined in section 80002; the processing fee as specified in section 80487(a)(1); and fingerprint clearance as specified in section 80442.

(f) Authorizations and Scope: The authorization for the ~~PK-3~~ Early Childhood Education Specialist Instruction Credential shall be as follows any of the following based on the preparation completed:

(1) For candidates who complete the clinical practice requirements outlined in subsection(a)(2)(C) above, the authorization for teaching services shall be issued with the following statement: "This credential authorizes the holder to teach all subjects in a self-contained general education classroom setting and, as a self-contained classroom teacher, to team teach or to regroup students across classrooms, in preschool through grade three."

(2) For candidates who complete the clinical practice requirements outlined in subsection (a)(2)(C)(i) above, the authorization for teaching services shall be issued with the following statement: "This credential authorizes the holder to teach all subjects in a self-contained general education classroom setting and, as a self-contained classroom teacher, to team teach or to regroup students across classrooms, in preschool through kindergarten."

(3) The authorization for English learner services shall be issued with the following statement: "The following instructional services may be provided to English learners in the settings and content area(s) specified on this document: (1) English language development defined as instruction designed specifically for limited-English-proficient students to develop their listening, speaking, reading, and writing skills in English; and (2) specially designed content instruction delivered in English defined as instruction in a subject area, delivered in English, that is specially designed to meet the needs of limited-English-proficient students. This English learner authorization also covers classes taught on the basis of other valid, non-emergency credentials or permits held within the settings or content/specialty area(s) listed at the grade or age levels authorized."

(~~3~~4) In addition to the teaching authorizations provided in subsections (f)(1) or (f)(2) above, and in (f)(2) above, an intern credential shall be issued with the following statement: "This individual has completed the intern preservice preparation, which included specific instruction on the teaching of English learners and is participating in a Commission approved intern preparation program. The individual must be supported by both the commission accredited program and the employer in the area(s) listed and in their work with English learners and must make satisfactory progress toward program completion for the duration of the intern credential."

(~~4~~5) An intern credential shall also be restricted to service with the California employing agency identified by the commission accredited program sponsor.

(g) Credential Validity: Period of validity for ~~PK-3~~ Early Childhood Education Specialist Instruction Credential shall be as follows:

(1) An intern credential issued pursuant to this section shall be initially issued for two years.

(2) A preliminary credential issued pursuant to this section shall be initially issued for five years.

(3) A clear credential issued pursuant to this section shall be valid for five years.  
(h) Submission of Applications: Issuance of the ~~PK-3~~ Early Childhood Education Specialist Instruction Credential shall require the following:

(1) For the preliminary credential candidate that has met all requirements outlined in section (a), submission of a formal online recommendation including submission of an application as defined in section 80002; the processing fee as specified in section 80487(a)(1); and fingerprint clearance as specified in section 80442.

(2) For the clear credential candidate that has met the requirement in section (b)(2)(i), submission of a formal online recommendation including submission of an application as defined in section 80002; the processing fee as specified in section 80487(a)(1); and fingerprint clearance as specified in section 80442.

(3) For the clear credential candidate that has met the requirement in section (b)(2)(ii), the candidate may apply directly to the commission by submitting an application as defined in section 80002; the processing fee as specified in section 80487(a)(1); and fingerprint clearance as specified in section 80442.

(4) For the intern program candidate that is enrolled in the program and has met the provisions of section (a) and subsection(c)(5)(A), submission of a formal online recommendation including submission of an application as defined in section 80002; the processing fee as specified in section 80487(a)(1); and fingerprint clearance as specified in section 80442.

Note: Authority cited: Section 44225(q), Education Code. Reference: Sections 44225(b) and (e), 44256(c) and 44265, Education Code.

#### § 80067.1 Preconditions for PK-3 Education Specialist Instruction Credential Programs.

(a) Limitation on Student Teaching Prerequisites.

(1) No college or university shall require candidates to complete more than the equivalent of nine semester units of credential preparation courses prior to allowing candidates to enroll in student teaching in a preschool or elementary classroom. This restriction may be increased to the equivalent of twelve semester units if the student teaching prerequisites include study of alternative methods of English Language Skills as required by Program Precondition 2.

(b) English Language Skills.

(1) In each program of professional preparation, candidates demonstrate knowledge of methods of developing English language skills including those for whom English is a second language, in accordance with the Commission's standards and performance expectations. The program includes the study of effective means of teaching literacy, in accordance with 44259 (b)(4)(A) and (B).

(c) Undergraduate Student Enrollment.

(1) Professional preparation, including student teaching, shall be made available in the upper division course offerings at all California public institutions of higher education.

(d) Assessing Candidates for Subject Matter Competence.



- (1) The program sponsor has a timely and systematic process for evaluating and notifying candidates of their standing in relation to the subject matter competence requirement. This process includes:
- (A) Providing candidates with clear and accurate information in all advising and application materials about all options available to demonstrate subject matter competence, for the PK-3 Early Childhood Education Specialist Instruction credential.
  - (B) Within the first 60 days of the candidate's admission, the institution must complete an assessment of each candidate's standing in relation to demonstration of the subject matter competence requirement and notify candidates of that standing.
- (e) Demonstration of Subject Matter Competence.
- (1) The approved PK-3 Early Childhood Education Specialist Instruction credential preparation program sponsor determines that each candidate meets the subject matter requirement prior to being given daily whole class instructional responsibilities in a preschool through third grade setting. Candidates may meet the subject matter competence requirement through one of the following two options:
- (A) Possession of a baccalaureate degree or higher from a regionally accredited institution of higher education with a degree major in Child Development, Child and Adolescent Development, Human Development, or Early Education, ~~or a similar major.~~
  - (B) 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.
- (f) Completion of Requirements.
- (1) A college or university or school district that operates a program for the PK-3 Early Childhood Education Specialist Instruction credential shall determine, prior to recommending a candidate for the credential, that the candidate meets all legal requirements for the credential including but not limited to:
- (A) Possession of a baccalaureate degree or higher from a regionally accredited institution of higher education.
  - (B) Completion of the subject matter requirement
  - (C) Passage of the Reading Instruction Competence Assessment (RICA) or a Commission approved literacy performance assessment for early childhood education.
  - (D) Completion of a Commission approved preparation program.
  - (E) Passage of a Commission approved teaching performance assessment for multiple subjects in a PK-3 setting, or passage of a commission approved teaching performance assessment for early childhood education.
- (g) Professional Preparation Program Equivalency for Clinical Practice.
- (1) Commission approved professional preparation programs for the PK-3 Early Childhood Specialist Instruction credential shall recognize and grant equivalency for prior experience, as follows, and shall develop a clearly articulated process for granting such equivalency.

- (2) PK-3 Early Childhood Education Specialist Instruction Credential candidates who meet both the requirements outlined in subsections (A) and (B) below shall be granted equivalence for at least 200 hours of the required clinical practice experience in a preschool (PK) or transitional kindergarten (TK) setting and may be granted equivalence for an additional 200 total hours of the required clinical practice experience in a PK or TK setting within the program of professional preparation. Such candidates must complete all other program requirements, including a clinical practice experience of at least 200 hours in a K-3 setting.
- (A) Either hold a valid Child Development Permit at the Teacher level or higher or verify employment as a lead teacher in a Head Start program or a childcare and development center serving preschool-aged children.
- (B) Verify six (6) years or more of satisfactory, full-time teaching experience as a lead teacher in a public or private center-based childcare and development program serving preschool-aged children that is either a license-exempt childcare and development center pursuant to California Health and Safety Code section 1596.792(o) or holds a license as defined in section 101152(l)(1), Article 1, Chapter 1, Division 12, of Title 22.
- (3) Satisfactory teaching experience shall be verified by the public or private center-based childcare and development center. Verification shall include a statement by the employer confirming that the teacher's performance was rated satisfactory or better in the following areas (must include all):
- (A) The use of developmentally appropriate teaching strategies for preschool-aged children.
- (B) The ability to establish and maintain developmentally appropriate standards and expectations for student behavior.
- (C) A demonstration of deep knowledge of the early literacy, early mathematics, and other preschool subjects, and the use of developmentally appropriate teaching and learning approaches that engage students and promote student understanding.
- (D) An ability to plan and implement a sequence of appropriate learning activities, both teacher and child initiated.
- (E) An ability to evaluate and assess student learning outcomes.
- (F) An ability to communicate effectively with young children and their families/guardians.
- (4) Candidates for the ECE Specialist Instruction who have completed a practicum course at a regionally accredited institution of higher education, including a community college, shall be granted clinical practice equivalency for these hours commensurate with the number of hours served in the practicum course, up to a maximum of 200 hours, provided that all of the following conditions are met:
- (A) The practicum course is credit bearing and degree applicable towards a Teacher Level or higher level Child Development Permit or a degree in Early Childhood Education, Child Development, Child and Adolescent Development, or Human Development.

(B) The practicum included clinical practice experience that was supervised at minimum by a trained faculty member/instructor who provided observation and feedback to the candidate.

(C) The candidate earned a C or better on the practicum course. Courses earned with a "Pass," or another designation deemed by the institution of higher education to be equivalent to a grade of "C" or higher are also acceptable.

(D) The candidate provides to the Commission-approved ECE Specialist Instruction program verification of the hours served through transcripts and other documentation as determined by the Commission-approved program.

(5) Candidates who have completed both a verified work experience as outlined in paragraph (g)(2) above and a qualified practicum experience as outlined in paragraph (g)(4) above may be granted a maximum of 400 hours total toward the clinical practice requirement and shall complete the remaining 200 hours of clinical practice in the teacher preparation program.

(h) ~~Proposed~~ Preconditions Specific to Interns

(1) Baccalaureate Degree Requirement.

(A) Candidates admitted to intern programs must hold baccalaureate degrees or higher from a regionally accredited institution of higher education.

(2) Demonstration of Subject Matter Competence.

(A) The approved Preliminary PK-3 Early Childhood Specialist Instruction preparation program sponsor determines that each candidate meets the subject matter requirement prior to being given daily whole class instructional responsibilities in a preschool through third grade setting, which may include one of the following two options:

1. Possession of a baccalaureate degree or higher from a regionally accredited institution of higher education with a degree major in Child Development, Child and Adolescent Development, Human Development, or Early Childhood Education, ~~or a related major.~~
2. 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.

(3) Preservice Requirement.

(A) Each PK-3 ECE Specialist Instruction credential Intern program must include a minimum 120-clock hour (or the semester or quarter unit equivalent) preservice component which includes foundational content in the following:

1. California's state adopted student standards and curriculum frameworks for core curriculum areas for grades K-3.
2. General pedagogical strategies for PK-3 children, including classroom management and planning.
3. Subject specific pedagogy, as appropriate to content areas for children in PK-3

- settings.
  - 4. Effective developmentally appropriate strategies in literacy and mathematics development for children in grades PK-3.
  - 5. Instruction in English Language Development for multilingual and English learner students.
  - 6. For interns in PK and TK settings, California Preschool Learning Foundations and Frameworks
- (4) Professional Development Plan.
- (A) The employing district has developed and implemented a Professional Development Plan for interns in consultation with a Commission-approved PK-3 Early Childhood Specialist Instruction program of teacher preparation. The plan shall include all the following:
- 1. Provisions for an annual evaluation of the intern.
  - 2. A description of the courses to be completed by the intern and a plan for the completion of preservice or other clinical training, if any, including student teaching.
  - 3. Additional instruction during the first semester of service, for interns teaching in preschool through third grade inclusive, in teaching methods and in inclusive settings for pupils with mild and moderate disabilities.
  - 4. Instruction, during the first year of service for interns teaching children in bilingual classes, in the methods of teaching multilingual children.
- (5) Supervision of Interns.
- (A) In all intern programs, the participating institution in partnership with the employing districts shall do the following prior to the intern teacher assuming daily teaching responsibilities:
- 1. Complete a signed Memorandum of Understanding between the commission accredited program sponsor and the California employing agency detailing the support and supervision that will be provided.
  - 2. Identify a mentor for the intern teacher who possesses a valid, corresponding life or clear teaching credential and a minimum of 3 years of successful teaching experience.
  - 3. In all intern programs, the participating institutions, in partnership with employing districts, shall provide 144 hours of support and supervision annually and 45 hours of support and supervision specific to teaching English learners for candidates without a valid English learner authorization.
  - 4. The intern program ensures that its partner employing district identifies an individual who is immediately available to assist the intern teacher with planning lessons that are appropriately designed and differentiated for English learners, for assessing children's language needs and documenting progress, and for support for the intern to language accessible instruction through in-classroom modeling and coaching as needed.
  - 5. No intern's salary may be reduced by more than 1/8 of its total to pay for supervision, and the salary of the intern shall not be less than the minimum

base salary paid to a regularly certificated person. If the intern salary is reduced, no more than eight interns may be advised by one district support person.

- (6) Assignment and Authorization.
  - (A) The program understands and communicates to the intern the scope of the authorization for the PK-3 ECE Specialist Instruction intern credential. The institution stipulates that the intern's services meet the instructional or service needs of the participating districts.
- (7) Participating Districts.
  - (A) Participating districts are California public school districts or county offices of education. Submissions for approval must identify the specific districts involved and the specific credential(s) involved.
- (8) Length of Validity of the Intern Certificate.
  - (A) Programs must communicate to interns that each PK-3 ECE Specialist Instruction intern certificate will be valid for a period of two years.
- (9) Non-Displacement of Certified Employees.
  - (A) The institution and participating districts must certify that interns do not displace certificated employees in participating districts.
- (10) Justification of Intern Program.
  - (A) When an institution submits a program for initial or continuing accreditation, the institution must explain why the intern program is being implemented. Programs that are developed to meet employment shortages must include a statement from the participating district(s) about the availability of qualified certificated persons holding the credential. The exclusive representative of certificated employees in the credential area (when applicable) is encouraged to submit a written statement to the Committee on Accreditation agreeing or disagreeing with the justification that is submitted.
- (11) Bilingual Language Proficiency.
  - (A) Intern programs must verify that candidates who are dually enrolled in a Bilingual Authorization program have attained a language proficiency level in listening, speaking, reading, and writing the target language that is equivalent to the passing standard on the appropriate CSET: World Languages language examination prior to recommending for the intern credential. This performance level is set at a minimum of ACTFL Advanced-Low for Western languages and ACTFL Intermediate-High for non-Western languages. Programs must submit evidence to the Commission which demonstrates how the program ensures that candidates meet the requirement.

Note: Authority cited: Section 44225, Education Code. Reference: Section 44325(c)(4).

#### 80067.2 PK-3 ECE Specialist Instruction Credential Program Standards

(a) Standard 1: Program Design and Curriculum. The program is designed to address the range of candidate performance expectations so that early childhood teachers will develop the knowledge, skills, and abilities to work effectively with all children from preschool through grade 3 and their families. Coursework and fieldwork/clinical practice experiences provide

candidates with opportunities to learn and practice competencies relating to the care and education of young children preschool to grade 3. Candidate preparation is grounded in a clearly articulated evidence-based theoretical framework of developmentally, linguistically, and culturally responsive teaching and learning practices for the care and education of young children. The program also includes preparation for collaborating effectively with families to support their children’s development and learning. These research and evidence-based theoretical foundations are reflected in the organization, scope, and sequence of the curriculum provided to candidates. In order to prepare candidates to effectively teach all PK-3 California public school students, the program’s curriculum includes child and adolescent growth and development, including the implications of neurodiversity, human learning theory; social, cultural, philosophical, and historical foundations of education; developmentally, linguistically, and culturally responsive pedagogy for young children in the content areas identified in the California with the most current K-3 Content Standards and Frameworks and the Preschool Learning Foundations and Curriculum Framework. The program design also includes a coherent candidate assessment system to provide formative information to candidates regarding their progress towards the credential.

(b) Standard 2: Preparing Candidates Toward Mastery of the PK-3 ECE Specialist Teaching Performance Expectations (PK-3 ECE TPEs). The PK-3 ECE Specialist Teaching Performance Expectations describe the set of professional knowledge, skills, and abilities expected of a beginning level PK-3 ECE Specialist practitioner in order to effectively support the growth, development, and learning of all PK-3 students in meeting the state-adopted standards and to work collaboratively with families to support children’s learning. The program’s organized coursework, and clinical practice experiences provide multiple opportunities for candidates to learn, apply, and reflect on each PK-3 ECE Teaching Performance Expectation (PK-3 ECE TPEs). As candidates progress through the program, pedagogical assignments are increasingly complex and challenging. The scope of the pedagogical assignments (a) addresses the PK-3 ECE Specialist Instruction TPEs as they apply to the authorization of the PK-3 ECE Specialist Instruction Credential, and (b) prepares the candidate for the teaching performance assessment (TPA) and other program-based assessments.

(c) Standard 3: Clinical Practice: Opportunities to Learn and to Practice

(1) Organization of Clinical Practice Experiences. The program’s clinical practice experiences are designed to provide the candidate with a developmental and sequential set of activities that are integrated with the program’s coursework and extend the candidate’s learning through application of theory to practice with PK-3 students in California early learning settings. Some or all of these experiences may take place within the candidate’s California Early Childhood Education employment setting (e.g., California State Preschool, Head Start) as well as within TK-3 public school settings, provided the candidate meets the 600 hours of clinical practice as described below.

Clinical Practice is a developmental and sequential set of activities integrated with theoretical and pedagogical coursework and must consist of a minimum of 600 hours of clinical practice. The range of Clinical Practice experiences provided by the program includes supervised early field experiences, initial student teaching (co-planning and co-teaching with both general educators and Education specialists, as appropriate, or guided teaching), and final student teaching. Clinical practice experiences must include two

different grade levels within the PK-3 grade range including at least 200 hours in a preschool (PK) and/or transitional Kindergarten (TK) setting and a minimum of 200 hours in a Kindergarten through third grade (K-3) setting. Student teaching includes a minimum of four weeks of solo or co-teaching or its equivalent. For interns, early field experience would take place in an experienced mentor's classroom. Candidates in a Teacher Residency program pathway must have experiences in a different grade level than which they are doing their residency placement. Clinical Practice, including field experiences, provides opportunities for all candidates to observe classrooms and settings that exemplify developmentally-, culturally- and linguistically appropriate and effective practices.

Candidates are provided with opportunities to gain knowledge of important concepts in early learning appropriate to the developmental range of young children PK-grade 3. For young children in PK, these concepts are consistent with California's adopted Preschool Learning Foundations and Curriculum Frameworks. For children in grades TK-3, these would be consistent with both the Preschool Learning Foundations and the K-3 Student Content Standards and Frameworks for these grade levels, as appropriate to the age/grade levels of the children. The program provides candidates with opportunities to demonstrate their understanding of a range of early childhood assessments of learning as well as of social, emotional growth and development. The program provides candidates with opportunities to understand how ECE personnel organize and supervise the work of other adults in the early learning setting (e.g., paraprofessionals, other support personnel).

As candidates progress through the curriculum, faculty and other qualified supervisors with appropriate background and expertise in early childhood education as identified and selected by the program and/or by the program in collaboration with employers, assess candidates' pedagogical performance in relation to the PK-3 ECE TPEs and provide formative and timely performance feedback regarding candidates' progress toward mastering the PK-3 ECE Specialist Instruction TPEs.

The program provides initial orientation for preparation program supervisors and employer-based supervisors of clinical practice experiences to ensure all supervisors understand their role and expectations. The minimum amount of program supervision involving formal evaluation of each candidate must be 4 times per quarter or 6 times per semester. The minimum amount of district-employed supervisors' support and guidance must be 5 hours per week.

Clinical supervision may include an in-person site visit, video capture or synchronous video observation, but the activities must be archived either by annotated video or scripted observations and evaluated based on the TPEs, in order to produce data that can be aggregated and disaggregated.

(2) Criteria for Clinical Practice Placements. Clinical sites should be selected that demonstrate commitment to developmentally, culturally, and linguistically appropriate practices as well as to collaborative relationships with families/guardians. In addition,

clinical sites should demonstrate evidence-based practices and continuous program improvement, have partnerships with appropriate other educational, social, and community entities that support teaching and learning, place students with disabilities in the Least Restrictive Environment (LRE), provide robust programs and support for English learners, reflect to the extent possible socioeconomic and cultural diversity, and permit video capture for candidate reflection and TPA completion. Clinical sites should also have a fully qualified site administrator.

(3) Criteria for the Selection of Program Supervisors. The program selects individuals who are credentialed, or who hold a Master Teacher or higher-level Child Development Permit as appropriate to the field placement of the candidate being supervised, or who have equivalent expertise such as an advanced degree or other evidence of professional competence and expertise in the field of early childhood education. Supervisors should have recent professional experiences in early childhood settings where the curriculum aligns with California's Preschool Learning Foundations and state-adopted Content Standards and Frameworks that reflect the diversity of California's student population, as appropriate to the instructional setting. The program provides supervisors with orientation to the program's expectations and assures that supervisors are knowledgeable about the program curriculum and assessments, including the TPEs and the Commission-approved TPA model(s) chosen by the program. In addition, program supervisors maintain current knowledge of effective supervision approaches such as cognitive coaching, adult learning theory, current content-specific pedagogy and instructional practices.

(4) Criteria for the Selection of LEA/ECE Employed Supervisors. The program selects LEA/ECE site supervisors who hold a PK-3 ECE Specialist Instruction Credential or a Multiple Subject Credential, or who hold a Master Teacher level or higher Child Development Permit and have a minimum of three years of appropriate teaching experience (e.g., Preschool, TK-3). The LEA/ECE supervisor must have demonstrated exemplary teaching practices as determined by the employer and the preparation program. The matching of candidate and LEA-employed supervisor must be a collaborative process between the employer and the program.

The program provides LEA-employed supervisors a minimum of 10 hours of initial orientation to the program curriculum, effective supervision approaches such as cognitive coaching, adult learning theory, and current content-specific pedagogy and instructional practices. The program ensures that LEA-employed supervisors remain current in the knowledge and skills needed to provide effective candidate supervision and address program expectations for Clinical Practice experiences.

(d) Standard 4: Equity, Inclusion and Diversity. The program provides each candidate with an opportunity to learn and apply theories and principles of educational equity for purposes of creating and supporting socially just learning environments. Through coursework and Clinical Practice experiences, candidates (a) examine their personal attitudes related to issues of privilege and power in different domains including age, gender, language, race, ethnicity, sexual orientation, religion, ableness, and socioeconomic status; (b) learn ways to analyze, monitor, and address these issues at the individual and system level; (c) understand how explicit and implicit racial bias impacts instruction, classroom management, and other early childhood program policies; and (d) develop an understanding of the role of the teacher in creating



equitable learning opportunities and outcomes in early childhood education settings. The program provides opportunities for candidates to learn how to identify, analyze and minimize personal bias, how policies and historical practices create and maintain institutional bias, and how teachers can help address any identified inequity.

The program prepares candidates to improve growth, development, and learning for all children by examining teaching, learning, children’s engagement, family and community involvement, and other supports for learning and access for all young children.

The program ensures candidates understand the importance of building on children’s strengths and assets as a foundation for supporting children’s growth, development, and learning, especially children who are multilingual language learners and children with disabilities or other special learning needs.

(e) Standard 5: Monitoring, Supporting, and Assessing Candidate Progress towards Meeting Credential Requirements. Candidates are assessed by the preparation program for meeting all applicable program requirements. With respect to the Teaching Performance Expectations (TPEs), candidates are assessed through a coherent set of performance-based activities focusing on the adopted PK-3 Performance Expectations. The information gained through the program’s assessments is used to help set learning goals for candidates and inform candidates’ progress towards meeting the PK-3 ECE TPEs. Program faculty, program supervisors, and LEA-based supervisors monitor and support candidates during their progress towards mastering the TPEs. Evidence regarding candidate progress and performance in meeting these and all other program requirements is used to guide advisement and assistance efforts. The program provides support and assistance to candidates and only retains candidates who are suited for advancement into teaching. Appropriate information is accessible to guide candidates’ meeting of all program requirements.

(f) Standard 6: Implementation of a Teaching Performance Assessment. The TPA is implemented according to the requirements of the Commission-approved model(s) selected by the program. One or more individuals responsible for implementing the TPA document the administration processes for all tasks/activities of the applicable TPA model(s) in accordance with the requirements of the selected model. The program consults as needed with the model sponsor where issues of consistency in implementing the model as designed arise. The program requires program faculty (including full time, adjunct, and other individuals providing instructional and/or supervisory services to candidates within the program) to become knowledgeable about the TPA tasks, rubrics, and scoring, as well as how the TPA is implemented within the program so that they can appropriately prepare candidates for the assessment and also use TPA data for program improvement purposes.

(g) Standard 6A: Administration of the Teaching Performance Assessment (TPA)

(1) The program identifies one or more individuals responsible for implementing the chosen. TPA model(s) and documents the administration processes for all tasks/activities of the applicable TPA model(s) in accordance with the model’s implementation requirements.

(2) For purposes of implementing the video requirement, the program places candidates only in student teaching or intern placements where the candidate is able to record his/her teaching with PK-3 students. The program assures that each PK-3 setting where the candidate is placed has a recording policy in place. The program requires candidates to

affirm that the candidate has followed all applicable video policies for the TPA task requiring a video and maintains records of this affirmation for a full accreditation cycle.

(3) If the program participates in the local scoring option provided by the model sponsor, the program coordinates with the model sponsor to identify the local assessors who would be used to score TPA responses from the program's candidates.

(4) The program maintains program level and candidate level TPA data, including but not limited to individual and aggregate results of candidate performance over time. The program documents the use of these data for Commission reporting, accreditation, and program improvement purposes.

(5) The program assures that candidates understand the appropriate use of materials submitted as part of their TPA responses, the appropriate use of their individual performance data, and privacy considerations relating to the use of candidate data.

(6) A program using a local scoring process establishes and consistently uses appropriate measures to ensure the security of all TPA training materials, including all print, online, video, and assessor materials which may be in the program's possession.

(7) The program has a clearly defined written appeal policy for candidates, informs candidates about the policy prior to the assessment, and implements the appeal policy with candidates who do not pass the TPA and appeal their results.

(8) The program using a local scoring process provides and implements an appeal policy, with the model sponsor, for candidates who do not pass the TPA.

(h) Standard 6B: Candidate Preparation and Support. The teacher preparation program assures that each candidate receives clear and accurate information about the nature of the pedagogical tasks within the Commission-approved teaching performance assessment model (s) selected by the program and the passing score standard for the assessment. The program provides multiple formative opportunities for candidates to prepare for the TPA tasks/activities. The program assures that candidates understand that all responses to the TPA submitted for scoring represent the candidate's own work. For candidates who are not successful on the assessment, the program provides appropriate remediation support and guidance on resubmitting task components consistent with the TPA model's guidelines.

(1) The program implements as indicated below the following support activities for candidates. These activities constitute required forms of support for candidates within the TPA process:

(A) Providing candidates with access to handbooks and other explanatory materials about the TPA and expectations for candidate performance on the assessment.

(B) Explaining TPA tasks and scoring rubrics.

(C) Engaging candidates in formative experiences aligned with a TPA (e.g., assignments analyzing their instruction, developing curriculum units, or assessing student work).

(D) Providing candidates who are not successful on the assessment with additional support focusing on understanding the task(s) and rubric(s) on which the candidate was not successful as well as on understanding what needs to be resubmitted for scoring and the process for resubmitting responses for scoring.

(2) These activities constitute acceptable, but not required forms of support for candidates within the TPA process:

(A) Guiding discussions about the TPA tasks and scoring rubrics.

- (B) Providing support documents such as advice on making good choices about what to use within the assessment responses.
  - (C) Using TPA scoring rubrics on assignments other than the candidate responses submitted for scoring.
  - (D) Asking probing questions about candidate draft TPA responses, without providing direct edits or specific suggestions about the candidate's work.
  - (E) Assisting candidates in understanding how to use the electronic platforms for models/programs using electronic uploading of candidate responses.
  - (F) Arranging technical assistance for the video portion of the assessment.
- (3) These activities constitute unacceptable forms of support for candidates within the TPA process:
- (A) Editing a candidate's official materials prior to submission and/ or prior to resubmission (for candidates who are unsuccessful on the assessment).
  - (B) Providing specific critique of candidate responses that indicates alternative responses, prior to submission for official scoring and/or prior to resubmission (for candidates who are unsuccessful on the assessment).
  - (C) Telling candidates which video clips to select for submission.
  - (D) Uploading candidate TPA responses (written responses or video entries) on public access websites, including social media.
- (4) The program provides candidates with timely feedback on formative assessments and experiences preparatory to the TPA. The feedback includes information relative to candidate demonstration of competency on the domains of the PK-3 Teaching Performance Expectations (PK-3 ECE TPEs).
- (5) The program provides opportunities for candidates who are not successful on the assessment to receive remedial assistance, and to retake the assessment. The program only recommends candidates who have met the passing score on the TPA for a PK-3 ECE Specialist Instruction Credential and have met all credential requirements.
- (i) Standard 6C: Assessor Qualifications, Training, and Scoring Reliability. The model sponsor selects potential assessors for the centralized scoring option. the program selects potential assessors for the local scoring option and must follow selection criteria established by the model sponsor. The selection criteria for all assessors include but are not limited to pedagogical expertise in the areas assessed within the TPA. The model sponsor is responsible for training, calibration, and scoring reliability for all assessors within the centralized scoring process. All potential assessors must pass initial training and calibration prior to scoring and must remain calibrated throughout the scoring process.
- (j) Standard 7: Effective Literacy Instruction in PK-3 Settings. The credential program's coursework and supervised field experiences encompass the study of effective means of teaching literacy to young children across all content areas based on California's State Board of Education (SBE)-adopted English Language Arts (ELA) and Literacy Standards, English Language Development (ELD) Standards, and Preschool Learning Foundations. Program coursework and supervised field experiences are aligned with the current, SBE-adopted English Language Arts/English Language Development Framework, including the crosscutting themes of Foundational Skills, Meaning Making, Language Development, Effective Expression, and Content Knowledge, as well as the Preschool Curriculum Framework. The program emphasizes

the relationships among the five themes, including the importance of the foundational skills to children’s learning across all themes and how progress in the other themes supports progress in the foundational skills. Through the integration of literacy coursework and supervised clinical practice, candidates learn that children’s instruction in each of the themes is essential and should occur concurrently (rather than sequentially), with emphasis based on the children’s age or grade-level standards as appropriate. Candidates also learn that for multilingual and English learner students, concurrent instruction in each of the themes through integrated and designated ELD is critical.

Grounded in Universal Design for Learning and asset-based pedagogies, the program supports the development of candidates’ knowledge, skills, and abilities expressed in the Teaching Performance Expectations to provide effective literacy instruction that is organized, comprehensive, systematic, evidence based, culturally and linguistically sustaining, and responsive to children’s age, grade, and prior literacy development. Candidates also learn to provide literacy instruction that is responsive to children’s linguistic, cognitive, and social strengths. Candidates learn the power of language (both oral and written) to understand and transform the world and to create and support socially just learning environments. The program builds candidates’ understanding that high-quality literacy instruction integrates all strands of the ELA/literacy standards, all parts of the ELD standards, all strands of the language and literacy and English-language development domains in the Preschool Learning Foundations, and other disciplinary standards to develop children’s capacities as effective and critical listeners, speakers, readers, and writers.

(1) The study of high-quality literacy instruction in the program also incorporates the following elements of the California Comprehensive State Literacy Plan:

(A) Principles of equity, diversity, and inclusion, including books and other instructional materials and practices that are asset based and culturally and linguistically responsive, affirming, and sustaining

(B) Multi-Tiered System of Support, including best first instruction; targeted, supplemental instruction for children whose literacy skills are not progressing as expected toward grade-level standards; and referrals for intensive intervention for children who have not benefited from supplemental support.

(C) Instruction that is responsive to individual children’s age, language and literacy development, and literacy goals; that engages families and communities as educational partners; and that is reflective of social and emotional learning and trauma-informed practices

(D) Incorporation of the California Dyslexia Guidelines

(E) Integrated and designated ELD

(F) Knowledge of how to promote multiliteracy in both English-medium and multilingual programs.

(G) Assessment for various purposes, including formative, progress monitoring, and summative literacy assessment; screening to determine children’s literacy profiles, including English learner typologies, and to identify potential difficulties in reading and

writing, including risk for dyslexia; and the possible need for referrals for additional assessment and intervention

(2) Consistent with the ELA/ELD Framework, candidates learn instructional practices, through coursework and supervised field experiences, that are active, motivating, and engaging. Candidates learn that effective practices begin with building on students' cultural and linguistic assets, including home languages and dialects, backgrounds, experiences, and knowledge, including family and community, in all instruction. The program makes clear the importance of creating environments that promote children's autonomy in learning, including providing choices in reading and other literacy-related activities. Candidates also learn that instructional practices vary according to children's age, learning profiles and goals, English language proficiency, and assessed strengths and needs and include, as appropriate, direct instruction, collaborative learning, and inquiry-based learning. Candidates also learn the value of guided self-assessment and goal setting for children's independence, motivation, and learning. Importantly, candidates learn the importance of creating literacy environments for young children that are nurturing and joyful and that encourage active, playful exploration and investigation and providing opportunities for children to engage freely in child-initiated, self-directed activities; work individually and in small groups; and take part in imaginative and dramatic play. The program also emphasizes the importance of families as the first, primary, and ongoing contributors to children's literacy development. Candidates learn ways to collaborate and partner with families and communities ensuring that families are welcomed, informed, heard, and included in literacy development opportunities.

(k) Standard 7A: Foundational Skills. The PK-3 ECE Specialist Instruction credential program offers coursework and supervised field experiences that include evidence-based means of teaching the foundational skills to all children as a part of a comprehensive literacy program, with special emphasis in transitional kindergarten through grade three. Foundational skills include print concepts, including letters of the alphabet; phonological awareness, including phonemic awareness; phonics, spelling, and word recognition; decoding and encoding; morphological awareness; and text reading fluency, including accuracy, prosody (expression), and rate (an indicator of automaticity). Through the program, candidates learn that effective instruction in foundational reading skills is structured and organized as well as direct, systematic, and explicit and occurs in an environment that is print rich and child centered. Candidates learn to engage young children actively and deliberately with games, books, poetry, oral storytelling, and songs that draw their attention to print, the manipulation of sounds, and alphabet letters.

The program ensures that candidates understand that instruction in phonological awareness and phonics includes phonemic awareness; letter-sound, spelling-sound, and sound-symbol correspondences; spelling patterns; and practice in connected, decodable text. Candidates learn that instruction in foundational skills, particularly in text reading fluency, also emphasizes spelling and syllable patterns, semantics, morphology, and syntax. As a result, candidates learn the connections among the foundational skills, language, and cognitive skills that support students as they learn to read and write increasingly complex disciplinary texts with

comprehension and effective expression. The program also teaches that decoding requires mapping of spellings to their pronunciation, while encoding requires mapping of phonemes to their spellings, and emphasizes teaching both in ways that reflect their reciprocal relationship. Accordingly, the program teaches candidates to provide explicit instruction for young children in letter formation/printing in conjunction with applicable foundational skills and to help children apply their encoding skills in comprehensive writing instruction.

The program also includes evidence-based means of teaching foundational skills to multilingual children/English learner students while they are simultaneously developing oral English language proficiency, and in some cases literacy skills in an additional language. The program teaches candidates to plan foundational skills instruction based on children's previous literacy experiences in their home languages and to differentiate instruction using guidance from the ELA/ELD Framework, including knowledge of cross-language transfer between the home languages and English.

The program teaches candidates that effective instruction in foundational skills employs early intervention strategies informed by ongoing measures of student progress and diagnostic techniques and includes tiered supports in inclusive settings for children with reading, writing, or other literacy difficulties and disabilities, including children at risk for or with dyslexia.

Candidates learn to monitor children's progress based on their knowledge of critical milestones of foundational skill development and to adjust and differentiate instruction for children whose skills are not progressing as expected toward grade-level standards. They also learn to adapt instruction and provide accommodations and supplemental support to children who continue to experience difficulty and to collaborate with children's families and guardians as well as with other teachers, specialists, and administrators from the school or district to initiate needed referrals for additional assessment and intensive intervention.

The program provides supervised, guided practice in clinical settings that allow candidates to provide comprehensive literacy instruction, including initial or supplemental foundational skills instruction at beginning levels of reading (i.e., instruction beyond the earliest years and before children have typically developed fluency in decoding).

(I) Standard 7B: Meaning Making. Coursework and supervised field experiences emphasize meaning making as the central purpose for interacting with and interpreting texts, composing texts, engaging in research, participating in discussion, speaking with others, and listening to, viewing, and giving presentations. The program teaches candidates ways to engage children in rich early literacy experiences. Candidates learn the value of reading aloud and strategies for modeling and assisting children in making predictions, retelling and reenacting, and responding to and generating questions about stories and other text. The program addresses literal and inferential comprehension with all children at all grades and in all disciplines, including making connections with prior knowledge and experiences. The program also teaches the importance of attending to higher order cognitive skills at all grades, such as reasoning, inferencing, perspective taking, and critical listening, speaking, reading, and writing across disciplines in ways that are appropriate for the age of the children. The program ensures that candidates understand that among the contributors to meaning making are language, including vocabulary and grammatical and discourse-level understandings; content knowledge; motivation and engagement; comprehension monitoring; and in the case of reading and writing, the ability to

recognize and produce printed words and use the alphabetic code to express ideas automatically and efficiently with understanding.

The program highlights the importance of providing children opportunities to interact with a range of print and digital, high-quality literary and informational texts that are developmentally appropriate and culturally and linguistically relevant and affirming as listeners, speakers, readers, and writers and to share their understandings, insights, and responses in collaboration with others. Through coursework and supervised field experiences, candidates learn to engage children in listening, reading, speaking, writing, and viewing closely to draw information from texts, ask and answer questions, and support analysis, reflection, and research. Candidates also learn to promote deep and sustained reading of increasingly complex texts and to plan instruction, including intentional scaffolding and integration of children's asset, based on an analysis of the text complexity of instructional materials and the integration of meaning making with other themes.

(m) Standard 7C: Language Development. Coursework and supervised field experiences emphasize language development as the cornerstone of literacy, learning, and relationship building and as a social process and meaning making system. Candidates learn that it is with and through language that children learn, think, and express information, ideas, perspectives, and questions orally and in writing. Candidates also learn to provide young children with thoughtful and rich exposure to and experience with varied forms of language and to respond attentively to children's use of language. The program presents ways to create environments and frame interactions that foster oral and written language development for all children, including discipline-specific academic language. Candidates learn to express interest in and attend to children's verbalizations and expand and elaborate on their language, adding details or more complex sentence structures. The program focuses on instruction that values and leverages children's existing linguistic repertoires, including home languages and dialects, and that accepts and encourages translanguaging. The program promotes multilingualism and addresses multiliteracy in both English-medium and multilingual programs. The program addresses the importance of developing children's language, including their knowledge of how language works. Candidates learn to support children's oral and written language development, including vocabulary knowledge and use. The program highlights effective teaching of vocabulary both indirectly (through rich and varied language experiences, frequent independent reading, and word play/word consciousness) and directly (through the explicit teaching of general academic and discipline-specific terms and of independent word learning strategies, including morphology and etymology). The program also attends to grammatical and discourse-level understandings of language. Candidates learn that grammatical structures (e.g., syntax) and vocabulary interact to form text types or genres that vary according to purpose, intended audience, context, situation, and discipline. The program addresses ways to facilitate children's learning of complex sentence and text structures and emphasizes that children enrich their language as they listen, speak, read, and write; interact with one another; learn about language; create diverse oral, print, digital, and multimodal texts; and engage with rich content across disciplines. Candidates learn to plan instruction based on the analysis of instructional materials and tasks; the assessment (formal and informal) of individual children's speaking, writing, and other communications; understanding of

children’s English language proficiency; and the integration of language development with other themes.

(n) Standard 7D: Effective Expression. Coursework and supervised field experiences address effective oral and written expression, including how children learn to effectively express themselves as activity, play, and discussion partners; presenters; and writers and to use digital media and visual displays to enhance their expression in a manner that is appropriate for their age and development. Candidates learn how to engage children in a range of interactions and collaborative conversations with diverse partners on grade-level topics and texts and to engage young children in extended conversations in which multiple conversational turns are taken. Candidates learn to help children identify effective expression in what they listen to, view, and read, as they examine the words, images, and organizational structure of written, oral, or visual text. Through the program, candidates learn to teach children to discuss, orally present, and write in ways appropriate to their age and development so that their meanings are conveyed clearly, logically, powerfully, and, when appropriate and desired, poetically. Candidates also learn how to help children communicate in ways appropriate for their purpose, audience, context, and task and gain command over the conventions of written and spoken English (along with other languages in multilingual programs) as they create print and digital texts. The program focuses on candidate instruction and supervised support that values and leverages children’s existing languages and dialects, including translanguaging, and that promotes effective expression in languages other than English in both English-medium and multilingual programs.

Through coursework and supervised field experiences, candidates learn to create writing-rich environments with instruction that carefully guides and supports children as they learn to write daily for various purposes, including informal writing. Candidates learn to model writing and engage children in responding to texts and experiences through dictation and writing that support learning and reflection across disciplines. Candidates learn that young children begin with drawings, marks, and scribbles that become strings of letters and phonetically spelled words and progress to conventional spellings and sentences. The program includes explicit instruction for children in transitional kindergarten and kindergarten in letter formation/ printing and related language conventions, such as capitalization and punctuation, in conjunction with applicable decoding skills.

Candidates learn to support children in grade one and beyond in the development of the organization, style, and mechanics of their writing. Additionally, candidates learn to teach children to plan, develop, provide feedback to peers, revise using peer and teacher feedback, edit, and produce their own writing and oral presentations in increasingly sophisticated genres, drawing on the modes of opinion, information, and narration. Candidates learn the importance of supporting students to use keyboarding, technology, and multimedia, as appropriate, and the value of developing spelling and handwriting fluency in the writing process. Candidates also learn to engage children in self- and peer-assessment using a range of tools and to allocate sufficient time for creation, reflection, and revision. The program teaches candidates to plan instruction based on the analysis of instructional materials and tasks; the assessment (formal and informal) of individual children’s speaking, writing, or other communications; and the integration of effective expression with other themes.



(o) Standard 7E: Content Knowledge. Coursework and supervised field experiences address content knowledge, which includes literary, cultural, and discipline-specific knowledge, as a powerful contributor to the comprehension of texts and sources of information and ideas. The program highlights the integration of literacy across disciplines and the reciprocal relationships among the development of academic language(s), literacy, and content knowledge. Additionally, the program promotes the collaboration of educators to plan and implement instruction that maximizes children’s development of literacy skills and content knowledge. The program also teaches candidates to understand that while building content knowledge enhances literacy development, it also serves to motivate many children, particularly when the content relevance is clear, reflects and values children’s diverse experiences and cultures, and is responsive to their interests.

The program emphasizes the importance of full access to content instruction—including through print and digital texts and multimedia, discussions, experimentation, and hands-on explorations—for all children. The program teaches candidates to provide the supports needed based on children’s language proficiency levels or learning differences and addresses inclusive practices and co-teaching models. Candidates learn to foster new learning and provide choices that reflect and expand children’s interests; they engage children in learning experiences that connect to the worlds they know while enriching and extending those worlds. The program helps candidates build children’s understandings of the ways in which disciplines use language and literacy to engage with content and communicate as members of discourse communities (e.g., historians, scientists).

The program addresses the role of content knowledge as children navigate increasingly complex literary and informational texts, research questions of interest, evaluate the credibility of sources, and share knowledge as writers and speakers in ways that are appropriate to their age and development. The program also teaches wide and independent reading in knowledge building and literacy development. In addition, the program provides multiple opportunities for candidates learn how to promote digital literacy and the use of educational technology, including the ability to find, evaluate, use, share, analyze, create, and communicate digital resources safely and responsibly, and to foster digital citizenship in ways that are appropriate for children’s age and development. The program teaches candidates to plan instruction based on the analysis of instructional materials, tasks, and student progress as well as the integration of content knowledge with other themes.

(p) Standard 7F. Literacy Instruction for Children with Disabilities. Coursework and supervised field experiences provide candidates an understanding of how various disabilities can impact literacy instruction (e.g., dyslexia, dysgraphia, autism, speech/language impairment, varied cognitive abilities, executive function disorder, visual impairments and blindness, deaf and hard of hearing). The program addresses how candidates can appropriately adapt, differentiate, and accommodate instruction to provide access to the curriculum for all children and to work effectively within co-teaching and inclusion models. The program teaches candidates to understand their responsibility for providing initial and supplemental instruction for children. Candidates learn and practice how to collaborate with families and guardians as well as with other teachers, specialists, and administrators from the school or district to gain additional assessment and instructional support for children. The program also teaches candidates to

understand the distinction between the characteristics of emerging bi/multilingualism and the range of learning disabilities. Candidates learn the importance of accurate identification (neither over- nor under-identification) of multilingual and English learner students with disabilities and to seek support from language development and disability education specialists to initiate appropriate referrals and interventions.

The program incorporates the California Dyslexia Guidelines, as specified in Education Code §44259(b)(4), through literacy coursework and, where practicable, supervised field experiences that include the definition of dyslexia and its characteristics; screening to determine literacy profiles and the risk for dyslexia and other potential reading and writing difficulties or disabilities; and effective approaches for teaching and adapting/differentiating instruction for children at risk for and with dyslexia and other literacy-related disabilities. Candidates learn that guiding principles for educating children at risk for and with dyslexia and other literacy-related disabilities are anchored in valid assessment and instructional practices that are evidence based and that incorporate structured literacy (i.e., instruction that is comprehensive, systematic, explicit, cumulative, and multimodal and that includes phonology, orthography, phonics, morphology, syntax, and semantics) along with other cognitive and perceptual supports.

(g) Standard 7G: Integrated and Designated English Language Development. Coursework and supervised field experiences emphasize that ELD should be integrated into ELA and all other content instruction and build on children’s cultural and linguistic assets, including their home languages and dialects. The program also emphasizes that comprehensive ELD includes both integrated and designated ELD and is part of Tier 1 instruction. Candidates learn how integrated and designated ELD are related, building into and from one another, and how designated ELD should be taught in connection with (rather than isolated from) content areas and topics. Through coursework and supervised field experiences, candidates learn to provide integrated ELD in which children identified as English learner students are taught to use and understand English to access and make meaning of academic content throughout the school day and across disciplines. All candidates learn to use the ELA/literacy standards, Preschool Learning Foundations, (or other content standards), and ELD standards, as defined in §11300(a, c), in tandem to plan instruction that advances English learner students’ academic and language development, strengthening their abilities to use academic English as they simultaneously learn content. The program teaches candidates to design instruction that is appropriate for children’s literacy profiles, levels of English language proficiency, and prior educational experiences. Candidates also learn to design instruction that develops children’s abilities to use English purposefully, interact in meaningful ways, and understand how English works.

The program also prepares candidates to provide designated ELD as a part of the regular school day in which English learner students are taught English language skills critical for engaging in grade-level content learning. Candidates learn that designated ELD instruction is tailored to children’s proficiency on the English language development continuum, based on the ELD standards. Candidates also learn to use the ELD standards as the focus of instruction in designated ELD in ways that support content instruction, building into and from specific topics of study. To the extent possible, the program provides supervised field experiences for

candidates that include English learner students and recently reclassified English learner students.

(r) Standard 7H: Literacy Teaching Performance Expectations and Supervised Clinical Practice. The program teaches all elements of the Literacy Teaching Performance Expectations and provides instruction, practice, and informal feedback and self-assessment focused on the knowledge, skills, and abilities required by any required local and/or state literacy performance assessments. Supervised, guided practice in clinical settings, as specified in §80067.2(b) and §80067.2(c)(1-4), provides opportunities for candidates to apply what they have learned and to gain feedback on how to improve and/or develop their practice to meet the learning needs of their children.

(s) Standard 8: Effective Mathematics Instruction in PK-3 Settings. The credential program's coursework and supervised field experiences include the study of effective means of teaching mathematics to young children, consistent with the State Board adopted K-3 Mathematics Standards and Framework and the Preschool Learning Foundations and Curriculum Framework. Coursework and supervised field experiences prepare teachers to model mathematical thinking, inquiry, practice, and processes in their classrooms and to engage in mathematics teaching and learning in a mutually respectful manner with students.

Coursework and supervised field experiences prepare candidates to draw on and extend children's prior mathematical knowledge, understandings, and capabilities. The program prepares candidates to build positive relationships with children that help candidates understand children's mathematical understandings and provide appropriate learning activities and experiences that build on children's developing mathematical capabilities. The program prepares candidates to use their knowledge of individual children to meet them where they are developmentally and provide the support needed to sustain their progress.

Through coursework and supervised field experiences programs stress the goal of building children's conceptual understanding so that children develop a strong foundation for later math learning. Candidates learn to engage children in activities that encourage students to use a range of tools and strategies to solve problems, including working in pairs or small groups. The program teaches candidates to relate mathematics to children's interests and everyday life and embed math learning opportunities in daily activities. Candidates learn how to differentiate instruction and learning activities to meet individual children's learning needs.

Candidates learn to provide learning activities and opportunities for children to figure out different ways to solve problems on their own or with classmates, and to explain or show how they arrived at their solution to the problem. Programs emphasize the importance of observing, listening, and reflecting on children's mathematical thinking and discourse and asking questions, posing new learning activities and opportunities and providing a variety of tools to further surface and build on children's mathematical thinking. Candidates learn to ask children questions to elicit children's thinking and problem-solving processes as they engage in math activities.

Coursework and supervised field experiences prepare teachers to facilitate children's learning in all of the critical strands of mathematics in the areas of 1) number and operations, including counting and cardinality, 2) mathematical thinking and understanding relationships, 3) algebra

and functions, 4) measurement and data analysis, and 5) geometry. For all strands and across all grade levels PK-3, the program provides teachers with effective ways to both engage children in *thinking* about mathematics while they *do* mathematics, and help children develop confidence in their mathematical skills. The program assists teachers to learn to help children develop increasingly complex mathematical understandings and skills consistent with the progression of the mathematics strands identified in the most current K-3 Mathematics Standards and Framework and the Preschool Learning Foundations and Curriculum Framework. Through coursework and supervised field experiences, candidates learn that deep mathematical thinking and learning occurs and is supported through promoting multiple modes of communication about mathematics, including language, gestures, movement, use of a variety of tools, writing, art, and other modalities, thereby allowing all children, including English learners and children with disabilities, opportunities to express their mathematical development in meaningful and comprehensible ways.

(t) Standard 9: Induction Individual Development Plan. Before exiting the preliminary program, candidates, LEA-based supervisors, and program supervisors collaborate on an individual development plan (IDP) consisting of recommendations for professional development and growth in the candidate's clear program. The plan is a portable document archived by the preliminary program and provided to the candidate for transmission to the clear/induction program.

Note: Authority cited Section 44225, Education Code. Reference: Sections 44256(c), 44259.7, 44265, 44265.5, 44227.7, and 44373, Education Code.

### 80067.3 PK-3 Early Childhood Education Specialist Instruction Teaching Performance Expectations (TPEs)

(a) TPE 1: Engaging and Supporting All Young Children in Learning. Candidates will:

- (1) Demonstrate knowledge of the range and characteristics of typical and atypical child development from birth to age eight, including competencies related to developmental progression (e.g., cognitive, social, emotional, linguistic, and physical) and use that knowledge to engage and support all children in learning.
- (2) Demonstrate and use knowledge about children's assets, including their prior experiences and interests, funds of knowledge, language, and sociocultural backgrounds, to engage and support them in learning.
- (3) Demonstrate and apply knowledge of the integral role and effects of children's interpersonal relationships (e.g., peers, school staff, parents/guardians, community) and cultural factors (e.g., traditions, beliefs) to engage and support them in learning.
- (4) Connect learning to meaningful and relevant contexts in the lives of children and facilitate both child and teacher-initiated active learning experiences which engage children's interests to deepen and extend their learning.
- (5) Engage and collaborate in partnership with families/guardians to support children's development and learning in a culturally responsive, respectful, and interactive manner.
- (6) Monitor children's active engagement in learning and adjust activities and tasks as needed to provide access to the full range of the curriculum for all children.
- (7) Promote children's thinking (e.g., creative, concrete, abstract, critical) through developmentally appropriate activities, including play-based learning activities, that provide

opportunities for children to engage in effective expression, inquiry, problem solving, and reflection on their learning.

(b) TPE 2: Creating and Maintaining Effective Environments for Children’s Development and Learning. Candidates will:

- (1) Create effective, developmentally appropriate, and culturally responsive learning environments (e.g., routines, classroom norms/expectations, physical space, access to materials and equipment) that promote all children’s development and learning.
- (2) Create a positive classroom climate by building rapport and a caring relationship with children and showing respect for children’s perspectives, identities, and home languages, providing assistance when needed, recognizing their work and accomplishments.
- (3) Communicate and collaborate effectively with peers, colleagues, specialists, families/guardians, and community service providers to support children’s development and learning.
- (4) Promote positive relationships and effective learning for all children by creating culturally and linguistically responsive, flexible learning environments and establishing classroom routines, procedures, expectations, and norms with children, in partnership with families/guardians.
- (5) Nurture children’s positive and developmentally appropriate: social behavior, self-regulation, and social emotional development, including emotional literacy by modeling and using respectful language to communicate and encourage positive student-to-student and student-to-teacher interactions.
- (6) Establish, maintain, and monitor inclusive learning environments that are safe (e.g., physically and emotionally) and foster a caring community where each child is treated fairly and respectfully by adults and peers by using positive interventions and supports (e.g., restorative justice, peer collaboration, developmentally appropriate conflict resolution practices).
- (7) Identify and access resources that provide inclusive support for all children, including those who have experienced trauma inside or outside of school (e.g., homelessness, foster care, serious medical needs, exposure to violence, abuse).

(c) TPE 3: Understanding and Organizing Core Curriculum for Children’s Learning. Candidates will:

- (1) Demonstrate knowledge of most current state adopted standards and use that knowledge to organize curriculum and create developmentally appropriate play-based activities, cross disciplinary activities/lessons, both child-led and teacher guided activities to promote all children’s learning.
- (2) Use subject specific pedagogy in accordance with the Preschool Learning Foundations, state standards, and frameworks within and across the core curriculum, including a focus on language, literacy, and mathematics.
- (3) Consult, collaborate, and/or co-teach with other educators to provide and support opportunities for children to learn and demonstrate their knowledge of the core curriculum.
- (4) Set individualized goals and objectives for content learning and make appropriate instructional adaptations to promote access to the core curriculum for all children.
- (5) Promote core curriculum knowledge in all children, including monolingual and multi-lingual children, children with disabilities and children with other learning needs, by

adapting the curriculum, implementing differentiated instruction, and providing explicit support for vocabulary and academic language development.

(6) Remove barriers to development and learning and provide access through instructional strategies which include, but are not limited to, the following:

(A) using developmentally appropriate instructional technology,

(B) applying principles of Universal Design for Learning (UDL): multiple means of engagement, representation, and action and expression,

(C) using Multi-Tiered System of Supports (MTSS), including assistive technology

(7) Model and promote critical digital literacy and digital citizenship where developmentally appropriate by applying the principles of the internationally recognized International Society of Technology in Education (ISTE) standards to engage children and support multiple ways to demonstrate their learning.

(d) TPE 4: Planning Instruction and Designing Developmentally Appropriate Learning Experiences for All Children. Candidates will:

(1) Plan activities and lessons that build on what children know, accommodate children's developmental needs and learning preferences and provide opportunities for large group, small group, and individual hands-on learning experiences.

(2) Ensure opportunities for both teacher- and child-initiated experiences that are engaging for young children and that contribute to children's content knowledge, language development, and social, emotional growth.

(3) Provide learning experiences, including those that may be informed by parents/guardians, that incorporate and help validate children's backgrounds (e.g., cultural, linguistic, ethnic, economic, gender), as well as their diverse learning preferences, skills, and levels of social development to meet children's individual needs.

(4) Provide opportunities for children to express their needs and to successfully participate in activities/lessons based on education plans (e.g., IEP and 504 plans) within the general education classroom setting to promote learning and social, emotional development.

(5) Integrate movement, kinesthetic activities, and other types of multisensory experiences within activities/lessons to support the development of different dimensions of children's development.

(6) Use digital tools and learning technologies across learning environments as appropriate to create new content and provide personalized and integrated technology-rich activities/lessons to engage children in learning, promote digital literacy, and offer multiple means for children to demonstrate their learning.

(7) Plan and adapt developmentally, linguistically, and culturally responsive learning activities /lessons, instructional materials, and resources for all children including mono- and multi-lingual learners to provide access to the core curriculum.

(8) Apply information based on observation as well as information that may be provided by parents/guardians about children's current levels of development, language proficiency, cultural background, content-specific learning goals and needs, and assessment data to plan and implement daily learning activities.

(e) TPE 5: Assessing and Documenting Children's Development and Learning. Candidates will:

(1) Demonstrate and apply knowledge of the purposes, characteristics, and appropriate uses of different types of assessments (e.g., diagnostic, informal, formal, progress-

monitoring, formative, summative, and performance) to design and administer culturally responsive, developmentally and linguistically appropriate classroom assessments, including use of scoring rubrics, and use the results to help plan and modify instruction and to document children's learning over time.

(2) Assess each child's learning and development as part of an ongoing cycle of observation, analysis, documentation, planning, implementation, and reflection.

(3) Analyze and interpret formative and summative assessment data to determine children's progress toward meeting learning goals.

(4) Apply assessment data and information from children's IEP, and/or 504 plans to establish learning goals and to differentiate and adapt instruction.

(5) Collaborate with specialists to interpret assessment results from formative and summative assessments to appropriately identify monolingual-and multilingual children, as well as children with language or other disabilities.

(6) Guide and monitor children in developmentally appropriate self-assessment to help them reflect on their learning goals and progress and to provide children with opportunities to revise or reframe their work based on assessment feedback.

(7) Communicate assessment information in an appropriate and timely manner to assist families/guardians in understanding children's progress in meeting social, emotional, content-specific, and language development goals.

(f) TPE 6: Developing as a Professional Early Childhood Educator. Candidates will:

(1) Reflect on one's own practice and use this information to improve teaching and learning in the ECE context.

(2) Exhibit and support acceptance and fairness toward all children, families/guardians, and colleagues to mitigate implicit and explicit biases and the ways they could negatively affect teaching and learning.

(3) Demonstrate professional responsibility for learning environments, including responsibility for the learning outcomes of all children along with appropriate concerns and policies regarding the privacy, health, and safety of children.

(4) Act with integrity in an honest and ethical manner with children's and families/guardians' well-being as a central concern. Comply with all laws concerning professional responsibilities, professional conduct, and moral fitness (i.e., mandated reporting, use of social media, and digital platforms).

(5) Co-plan, co-teach, and communicate effectively with colleagues, mentors, and/or specialists in the early childhood setting to reflect on practices and gain feedback about one's own effectiveness in meeting children's learning needs.

(g) TPE 7: Effective Literacy Instruction for PK-3 Settings. Candidates will:

(1) Plan and implement evidence-based literacy instruction appropriate to children's age, grade, and development (including children's linguistic, cognitive, and social strengths) that is grounded in an understanding of California's most current English Language Arts and Literacy Standards, English Language Development Standards, and Preschool Learning Foundations; the themes of the English Language Arts/English Language Development Framework(Foundational skills, Meaning making, Language Development, Effective Expression, and Content Knowledge) and their integration; and the most current Preschool Curriculum Framework.

(2) Plan and implement evidence-based literacy instruction appropriate to children’s age, grade, and development (including children’s linguistic, cognitive, and social strengths) that is grounded in an understanding of Universal Design for Learning; California’s Multi-Tiered System of Support (Tier 1–Best first instruction, Tier 2–Targeted, supplemental instruction, and Tier 3–Referrals for intensive intervention); and the most current California Dyslexia Guidelines, including the definition and characteristics of dyslexia and structured literacy (i.e., instruction for children at risk for and with dyslexia that is comprehensive, systematic, explicit, cumulative, and multimodal and that includes phonology, orthography, phonics, morphology, syntax, and semantics).

(3) Incorporate asset-based pedagogies and inclusive approaches and culturally and linguistically affirming and sustaining practices in literacy instruction, recognizing and incorporating the diversity of children’s cultures, languages, dialects, and home communities.

(4) Promote children’s literacy development in languages other than English in multilingual (dual language and bilingual education) programs.

(5) Provide literacy instruction for all children that is active, motivating, and engaging; responsive to children’s age, language and literacy development, and literacy goals; reflective of family engagement, social and emotional learning, and trauma-informed practices; and based on children’s assessed learning strengths and needs, analysis of instructional materials and tasks, and identified academic standards.

(6) Create literacy environments for young children that encourage active, playful exploration; interaction with others; child-initiated, self-directed activities; and imaginative and dramatic play.

(7) Foundational Skills. Develop children’s foundational skills according to standards and expectations specified for children’s age and grade.

(8) Develop children’s skills in print concepts, including letters of the alphabet; phonological awareness, including phonemic awareness; phonics, spelling, and word recognition, including letter-sound, spelling-sound, and sound-symbol correspondences; decoding and encoding; morphological awareness; and text reading fluency, including accuracy, prosody (expression), and rate (as an indicator of automaticity), through instruction that structured and organized as well as direct, systematic, and explicit and that includes practice in connected, decodable text.

(9) Create literacy environments that are print rich and that foster interest in print; engage young children actively and deliberately with games, books, poetry, oral storytelling, and songs that draw their attention to print, the manipulation of sounds, and alphabet letters.

(10) Provide instruction in text reading fluency that emphasizes spelling and syllable patterns, semantics, morphology, and syntax.

(11) Advance children’s progress in the elements of foundational skills, language, and cognitive skills that support them as they read and write increasingly complex disciplinary texts with comprehension and effective expression.

(12) Engage children in meaning making by building on prior knowledge and using age-appropriate literary and informational texts (print, digital, and oral) that are appropriately complex and that mirror children’s backgrounds, including their cultures, languages, genders, and abilities.



(13) Engage children in questioning and discussion to develop their literal and inferential comprehension, including the higher-order cognitive skills of reasoning, perspective taking, and critical listening, speaking, reading, and writing.

(14) Engage children in reading, listening, speaking, writing, and viewing closely to draw information from texts, ask and answer questions, and support analysis, reflection, and research.

(15) Ensure that literacy experiences for young children include reading aloud, modeling, and assisting children in making predictions, retelling and reenacting, and responding to and generating questions about stories, picture books, and other texts.

(16) Promote children's oral and written language development by providing rich exposure to and experience with varied forms of language and responding attentively to children's language use.

(17) Develop children's language by attending to vocabulary knowledge and use, grammatical structures (e.g., syntax), and discourse-level understandings as children listen, speak, read, and write with comprehension and effective expression.

(18) Create environments that foster oral and written language development, including discipline-specific academic language.

(19) Enhance language development by engaging children in the creation of diverse print, oral, digital, and multimedia texts.

(20) Conduct instruction that leverages children's existing linguistic repertoires, including home languages and dialects, and that accepts and encourages translanguaging.

(21) Develop children's effective expression as they discuss, present, write, and use language conventions.

(22) Engage children in a range of formal and informal collaborative discussions, including extended conversations in which multiple conversational turns are taken, and writing for varied purposes, audiences, and contexts.

(23) Develop young children's early writing skills by prompting them to share ideas, information, and stories using their developing knowledge of how print works.

(24) Teach children in ways appropriate for their age and development to plan, develop, provide feedback to peers, revise using peer and teacher feedback, edit, and produce their own writing and oral presentations in various genres, drawing on the modes of opinion, information, and narration. In transitional kindergarten and beyond, teach children letter formation/printing and related language conventions, such as capitalization and punctuation, in conjunction with applicable decoding skills.

(25) Develop children's use of keyboarding, technology, and multimedia, as appropriate, and fluency in spelling, handwriting, and other language conventions to support writing and presentations.

(26) Promote children's content knowledge by engaging children in literacy instruction, in all pertinent content areas, that integrates reading, writing, listening, and speaking in discipline-specific ways, including through printed and digital texts and multimedia; discussions; experimentation; hands-on explorations; and wide and independent reading and read alouds and by providing choices that reflect and expand their interests.

(27) Teach children to navigate increasingly complex literary and informational texts relevant to the discipline, research questions of interest, and convey knowledge in a variety of ways.

(28) Promote digital literacy and the use of technology, including the ability to find, evaluate, use, share, analyze, create, and communicate digital resources safely and responsibly, and foster digital citizenship.

(29) Monitor children’s progress in literacy development using formative assessment practices, ongoing progress monitoring, and diagnostic techniques that inform instructional decision making as described in §80067.3(e).

(30) Understand how to use screening to determine children’s literacy profiles and identify potential reading and writing difficulties, including children’s risk for dyslexia and other literacy-related disabilities.

(31) Understand how to appropriately assess and interpret results for English learner students. If indicated, collaborate with families and guardians as well as with teachers, specialists, other professionals, and administrators from the school or district to facilitate comprehensive assessment for disabilities in English and as appropriate in the home language; plan and provide supplemental instruction in inclusive settings; and initiate referrals for children who need more intensive support.

(32) Provide instruction in English language development (ELD) for children identified as English learner students based on an understanding of comprehensive ELD, which includes both integrated and designated ELD and is part of Tier 1 instruction.

(33) Understand how integrated and designated ELD are related and how designated ELD is taught in connection with (rather than isolated from) content areas and topics.

(34) Use ELA/literacy standards, Preschool Learning Foundations, or other content standards and ELD standards in tandem to plan instruction that attends to children’s literacy profiles, levels of English language proficiency, and prior educational experiences.

(35) Provide ELD instruction that builds on children’s cultural and linguistic assets and develops children’s abilities to use English purposefully, interact in meaningful ways, and understand how English works across the disciplines.

(h) TPE 8: Effective Mathematics Instruction in a PK-3 Setting. Candidates will:

(1) Plan and implement mathematics instruction appropriate to children’s age, grade, and developmental levels (including children’s linguistic, cognitive, social and emotional strengths and learning needs) that is grounded in an understanding of California’s most current Mathematics Standards and Framework and the most current Preschool Learning Foundations and Curriculum Framework.

(2) Provide learning opportunities, consistent with Universal Design for Learning principles, for children to develop knowledge related to:

(A) number and operations, including counting and cardinality

(B) mathematical thinking and understanding relationships

(C) algebra and functions

(D) measurement and data analysis

(E) geometry, as described in the California’s most current Mathematics Standards and the most current Preschool Learning Foundations.

(3) Provide a secure environment for children to take intellectual risks, foster positive attitudes toward mathematics and encourage student curiosity, academic discourse, and persistence in solving mathematical problems.

(4) Consistent with California's Standards for Mathematical Practice, develop children's abilities according to their individual developmental levels, linguistic, cognitive, social and emotional strengths and learning needs, to:

(A) Make sense of problems and persevere in solving them

(B) Reason abstractly and quantitatively

(C) Construct viable arguments and critique the reasoning of others

(D) Model with mathematics

(E) Use appropriate tools strategically

(F) Attend to precision

(G) Look for and make use of structure

(H) Look for and express regularity in repeated reasoning

(I) Make and test conjectures to solve problems; and

(J) Recognize relationships within and among concepts.

(5) Differentiate and provide developmentally appropriate instruction and tasks to meet individual children's learning needs and engage children in self-initiated as well as teacher-led learning activities, including play-based activities, that use manipulatives and other tools to solve problems.

(6) Observe and interpret children's strategies in solving problems and ask thought-provoking questions that lead to deeper understanding (e.g., analysis, synthesis, evaluation). Provide follow-up activities and ensure access to manipulatives and other tools, including education technology to further develop and build on children's mathematical thinking.

(7) Support respectful child-to-child interactions as students engage with their classmates to figure out ways to solve problems and explain or show how they arrived at their solution and provide ways for children to demonstrate their ability to construct mathematical arguments based on sound reasoning and relevant evidence.

(8) Support all children to develop the academic language of mathematics, ensuring access for all children to the content of mathematics appropriate to grade level expectations and encourage parents/guardians to use the home language to talk about mathematics (especially numbers, arithmetic, spatial relations, and patterns) and share with children where mathematics is used in the home and the community.

Note: Authority cited Section 44225, Education Code. Reference: Sections 44256(c), 44259.7, 44265, 44265.5, 44227.7, and 44373, Education Code.

## Appendix D

### *Written Response Representing Group in Support*

**Children Now - Jessica Sawko**

March 24, 2022

ATTN: Christina Villanueva  
Commission on Teacher Credentialing  
1900 Capitol Avenue  
Sacramento, CA 95811  
VIA EMAIL ONLY: Christina.Villanueva@ctc.ca.gov

RE: Proposed Amendments to Title 5 of the California Code of Regulations Pertaining to the PK-3 Early Childhood Education Specialist Credential

Dear Commission on Teacher Credentialing:

On behalf of Children Now, I write in support of the progress to develop a PK-3 Early Childhood Specialist Credential. With the expansion of Transitional Kindergarten (TK), the state's early literacy and mathematics crisis, and the significant improvement in outcomes for kids participating in high-quality, early learning programs with well-prepared teachers, it is essential the Commission remain on timeline to develop this credential. It is also critical to have a credential with multiple supported pathways to entry. To this end, I offer changes to the proposed amendments to Title 5 of the California Codes of Regulations (CCR) 80067, 80067.1, and 80067.2. Most critically, we urge the Commission to remove the requirement in 80067.2(c) (Program Standard 3) for two different placements for clinical practice and allow for a single clinical practice experience in any of the grades PK-3. Far too often, well-intended policies "do more harm than good," and this dual placement requirement is one of those. While consistent with the recommendation of the work group, such a requirement represents a large barrier to this credential. This barrier far outweighs the benefit a credential candidate would receive from a dual clinical placement requirement.

If the requirement to have two different clinical placements remains, we urge you to adjust the grade bands for the dual clinical practices from PK/TK and K-3 to PK and TK-3. Given TK is only offered in a public-school setting, clinical practice in a TK classroom should be sufficient to help a preservice teacher to gain experience in working with school-aged children, navigating public school processes and procedures, and meeting the needs of young learners. I have closely monitored and engaged in the process to develop the proposed PK-3 Early Childhood Education (ECE) Specialist Credential and am encouraged by the progress to date. I offer the following comments and recommendations to aid the Commission in finalizing equitable regulations which will aid potential PK-3 Early Childhood Education Specialist Credential candidates to enter the profession from a broad variety of pathways, while ensuring they have the preparation they need to support California's kids.

Children Now is strongly supportive of Program Standard 4: Equity, Inclusion and Diversity as proposed in CCR 80067.1(d). California's students are diverse in their ethnic and racial identities, gender and sexual orientations, socioeconomic backgrounds, language, and physical abilities, and neurologically diverse, among many other critical identities. That is why it is imperative for teachers to be given the opportunity, support, and education needed to help them understand their own biases, systemic bias, structural bias, and institutional bias. As described in the standard, teachers are responsible for creating equitable learning opportunities and outcomes in their classrooms. They must be provided with the support and education needed in order to achieve this.

Additionally, we strongly support Program Standard 7: Effective Literacy Instruction in PK-3 Settings, Program Standards 7A-7H, and Program Standard 8: Effective Mathematics Instruction in PK-3 Settings (CCR 80067.1(j), (k-r), and (s), respectively). According to 2021/2022 statewide summative assessment data, a majority of third graders are not having their educational needs adequately met in English language arts (68%) and math (66%). Access to high-quality literacy and math learning experiences, including play-based learning experiences, are critical to a student's long-term success. Program Standards 7 and 8 make an educator preparation programs responsibility clear for supporting their students in becoming well-prepared to facilitate learning of these critical, foundational skills in our states youngest learners, both mono and multilingual.

Children Now urges the Commission to consider some modifications to the proposed regulations, as detailed below.

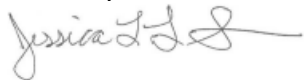
- Teacher Apprenticeship Preparation Programs should be included in the list of professional program models outlined in CCR 80067(c). While still in development, this program model can be added now by adding (6) Other teacher preparation program model accredited by the Commission on Teacher Credentialing for the issuance of a PK-3 Early Childhood Education Specialist Credential, e.g. teacher apprenticeship preparation programs.
- In CCR 80067 (d)(1) reconsider requiring two different placements for clinical practice and allow for a single clinical practice experience PK-3 or adjust the grade bands for the dual clinical practices from PK-TK and K-3 to PK and TK-3. Given TK is only offered in a public school setting, that experience should be sufficient to help a preservice teacher to gain experience in working with school-aged children, navigating public school processes and procedures, and meeting the needs of young learners.
- In CCR 80067 (e), the lack of requirement for a multiple subject credential holder to have a 200-hour clinical practice experience in a preschool setting is inequitable compared to the requirements in CCR 80067 (d), unless the change proposed above to eliminate two placements is removed.
- Add to CCR 80067.1 (h)(3)(A): 5. California Preschool Learning Foundations and frameworks.
- Clarifying 80067.1(h)(4)(A)2. Will interns also need to be placed outside their classroom of record for clinical practice in order to meet the requirements as currently proposed?

- Modifying CCR 80067.2 (c)(1) (Program Standard 3: Clinical Practice: Opportunities to Learn and to Practice) as follows: Residency program pathway ~~must~~ may have experiences in a different grade level than which they are doing their residency placement. Some residents may have their clinical placements in combination TK/K classrooms, as proposed, a resident would be required to serve in another setting. Children Now supports waiving the dual clinical practice placement requirement of all candidates for the PK-3 ECE Specialist Credential.

Children Now supports the Teacher Performance Expectations (TPEs) as proposed in CCR 80067.3. These TPEs are distinct from the multiple subject TPEs and allow for teachers earning a PK-3 credential to hone their skills and deepen their understanding of the educational needs of young, often multilingual, learners. Critically, the TPEs call for robust family engagement, an asset-based, culturally and linguistically supportive approach to instruction, elevates play-based learning, and includes the most up to date TPEs for literacy and mathematics.

I thank the Commission, Commission staff, and members of the PK-3 ECE work group who gave so generously of their time and expertise to bring this credential together and on a timeline that may allow for enrollment to begin this fall.

Sincerely,

A handwritten signature in black ink, appearing to read "Jessica L. Sawko", is enclosed within a thin yellow rectangular border.

Jessica L. Sawko  
Director, Education

**Learning Policy Institute - Hanna Melnick and Abby Schachner**

March 27, 2023

Dr. Tine Sloan  
Chair, Commission on Teacher Credentialing (CTC)  
1900 Capitol Ave.  
Sacramento, CA, 95811

Re: Proposed Amendments to Title 5 of the California Code of Regulations Pertaining to the PK- 3 Early Childhood Education Specialist Credential

Dear Chair Sloan,

We would like to comment on the strengths of the proposed PK-3 ECE Specialist Credential and on potential improvements to the credential from the perspective of our research on early childhood credentials and preparation programs across the county, as well as our research on California labor markets for staffing TK and K-12 classrooms.

High-quality and effective preschool programs require knowledgeable and skilled early educators.<sup>1</sup> As we found in our research, 46 states and Washington D.C. have created early childhood credentials, most of which extend into the primary grades (through grade 2 or 3 in most cases).<sup>2</sup> With California's expansion of transitional kindergarten (TK) and the California State Preschool Program to serve all 3- and 4-year-olds, the state and its institutions of higher education have the opportunity to create and offer new teacher preparation programs that develop a qualified early educator workforce.

We commend the CTC for moving with urgency to create the PK-3 ECE Specialist credential and for building it with attention to the knowledge base for practice and strong models for credentialing identified across the country. When the legislature and Administration funded universal TK in June 2021, they did so on a rapid timeline, which our research projects will create the need for 11,900 to 15,600 additional TK teachers by 2025-26.<sup>3</sup> The CTC has moved quickly to fulfill the recommendation of the California Master Plan for Early Learning and Care to develop an early grade credential so that more of these teachers will have the specialized knowledge and experience required for working with young children.

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<sup>1</sup> Allen, L., & Kelly, B. B. (Eds.). (2015). *Transforming the Workforce for Children Birth Through Age 8: A Unifying Foundation*. Washington, DC: National Academies Press.

<sup>2</sup> Schachner, A., Plasencia, S., Wang, V., McJunkins, C., Mauerman, C., Yun, C., & Stipek, D. (2023). *Early Childhood Teaching Credentials: Lessons from Four States and Eight Preparation Institutions*. [Forthcoming report]. Palo Alto, CA: Learning Policy Institute.

<sup>3</sup> Melnick, H., García, E., & Leung-Gagné, M. (2022). *Building a well-qualified transitional kindergarten workforce in California: Needs and opportunities*. Learning Policy Institute. <https://doi.org/10.54300/826.674>

Crafting such a credential requires input from diverse stakeholders spanning many institutions, and is no easy task, especially with divergent interests across the state and on a tight timeline.<sup>4</sup>

Within the proposed regulations, we appreciate the draft PK-3 ECE Specialist Teacher Performance Expectations (TPEs), which lay out what teachers need to know and do to support the development of essential skills in the early years. These expectations are aligned with the essential early educator competencies that research shows teachers must have to support young children, including the ability to use developmentally appropriate practices and playful learning that support essential child skills.<sup>5</sup> In a forthcoming study of early childhood credential programs in Louisiana, Massachusetts, New Jersey, and New York, we outline the 10 topic areas that are included in coursework that most early childhood educators view as important: 1) foundational child development theory; 2) teaching methodology & developmentally appropriate pedagogy; 3) special education and inclusion; 4) literacy and language development; 5) mathematics methods; 6) learning environments for multilingual learners; 7) curriculum development; 8) observations and assessments; 9) social emotional development; and 10) working with families.<sup>6</sup> These areas are all covered in the proposed TPEs.

We also think that the Program Standards that PK-3 ECE Specialist teacher preparation programs must meet are in line with the credential requirements of other leading states, especially the rigorous requirements for clinical experience. We understand and appreciate the benefits of clinical experience in two grade spans (pre-k/TK and K-3), and we commend the CTC for improving credential accessibility by allowing prior teaching experience and education to count for a portion of these PK-3 clinical requirements.

One consideration we would like to raise is how to make the credential more accessible to current early educators, especially those with preschool teaching experience who would like to teach TK on an intern credential. These candidates would still need to complete at least 200 hours of clinical practice in a K-3 classroom in addition to meeting the clinical requirements for teaching in preschool or TK settings through their place of work.<sup>7</sup> By contrast, the proposed regulations would allow Multiple Subject credential holders to earn the PK-3 ECE Specialist credential without completing any additional clinical hours, even if their original clinical experience was in grades 4-8.<sup>8</sup>

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<sup>4</sup> Learning Policy Institute. (2022, June 30). [Webinar] *Coming Together to Support High-Quality P-3 Teacher Preparation in California*. <https://learningpolicyinstitute.org/event/webinar-coming-together-support-high-quality-p-3-teacher-preparation-california>

<sup>5</sup> Meloy, B., & Schachner, A. (2019). *Early Childhood Essentials: A Framework for Aligning Child Skills and Educator Competencies*. Palo Alto, CA: Learning Policy Institute.

<sup>6</sup> Schachner, A., Plasencia, S., Wang, V., McJunkins, C., Mauerman, C., Yun, C., & Stipek, D. (2023). *Early Childhood Teaching Credentials: Lessons from Four States and Eight Preparation Institutions*. [Forthcoming report]. Palo Alto, CA: Learning Policy Institute.

<sup>7</sup> § 80067.2 (c)(1) of the proposed regulations

<sup>8</sup> § 80067 (e) of the proposed regulations



This misalignment may unintentionally create barriers for experienced early educators to obtain the PK-3 credential and teach in TK classrooms. Ensuring pathways for early educators is a matter of equity, as many are women of color who would contribute to the racial, ethnic, linguistic, and cultural diversity of the TK-12 workforce and currently earn about half the wages of a TK teacher despite working with children of similar age.<sup>9</sup> The clinical experience requirement is particularly a barrier for candidates who enter on intern credentials in TK classrooms, since they would need to leave the classroom in which they are the teacher of record to complete clinical hours in a K-3 classroom. Adding this burden may hinder the state's ability to meet workforce demands and is not required of interns earning their Multiple Subject teaching credential. TK workforce projections indicate an almost tripled demand for TK teachers over the next few years, and many current early educators are well-suited to fill these positions.

If the commission is concerned about extending the ability to teach in higher grades to candidates without commensurate clinical experience, a potential solution might be offering a specialization within the PK-3 credential that authorizes the holder to teach only in grades pre-K, TK, and Kindergarten. This would be in alignment with California's current Single Subject math credentials: Candidates can obtain a Foundational-Level Mathematics credential that allows teachers to teach general mathematics courses, but not higher level and Advanced Placement courses.<sup>10</sup> Candidates who desire to teach these courses need to demonstrate additional subject matter knowledge in calculus by taking the CSET Subtest 3 to obtain the Mathematics credential. Similarly, teachers with the "foundational" early childhood credential would need to complete the additional clinical experience in grades 1-3 in order to teach in the primary grades.

Finally, we want to recognize that investments will be needed to ensure that PK-3 ECE Specialist credential programs are both strong and accessible, although securing these investments is outside the scope of the CTC. Our study of early childhood credential programs in other states, as well as New Jersey's rapid expansion of preschool in the early 2000s, show that state investments helped spur the rapid development of credentialing programs.<sup>11</sup>

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<sup>9</sup> Powell, A., Montoya, E., Austin, L.J.E., Kim, Y., Muruvi, W., & Petic, A.C. (2023). *Teachers of Preschool-Age Children in California*. Center for the Study of Child Care Employment, University of California, Berkeley. <https://cscce.berkeley.edu/wp-content/uploads/2023/02/CSCCE-Teachers-of-Preschool-CA.pdf>.

<sup>10</sup> California Commission on Teacher Credentialing. (2023). *Domains of the Subject Matter Requirements*. [https://www.ctc.ca.gov/docs/default-source/educator-prep/files/domains-of-subject-matter-requirements.pdf?sfvrsn=dcd525b1\\_2](https://www.ctc.ca.gov/docs/default-source/educator-prep/files/domains-of-subject-matter-requirements.pdf?sfvrsn=dcd525b1_2). (accessed 3/24/23). California Commission on Teacher Credentialing. (2022). *Table 1 – CSET Examinations*. [https://www.ctc.ca.gov/credentials/leaflets/Subject-Matter-Competence-by-Exam-\(CL-674S\)/table-1-cset-examinations](https://www.ctc.ca.gov/credentials/leaflets/Subject-Matter-Competence-by-Exam-(CL-674S)/table-1-cset-examinations)

<sup>11</sup> Schachner, A., Plasencia, S., Wang, V., McJunkins, C., Mauerman, C., Yun, C., & Stipek, D. (2023). *Early Childhood Teaching Credentials: Lessons from Four States and Eight Preparation Institutions*. [Forthcoming]

Furthermore, state investments in financial and academic supports for candidates can make credentials obtainable to a more diverse workforce, including experienced early educators who earn low wages and cannot afford to take time off to earn a credential.<sup>12</sup> California has made important strides to offer financial resources to expand the ECE workforce, and it will be important to continue these investments.<sup>13</sup>

We again want to appreciate the Commission’s concerted work on the PK-3 ECE Specialist credential, which will support educators’ specialized knowledge in young children that research suggests is critical. Attempting such a complex endeavor on a tight timeline is not easy, but we believe that moving with speed and prioritizing equity is in the best interest of children and for fulfilling the promise of California’s historic preschool expansion.

Sincerely,



Hanna Melnick  
Senior Policy Advisor  
Learning Policy Institute



Abby Schachner  
Senior Researcher  
Learning Policy Institute

## **California Education Partners - Philip Halperin and Steven Kellner**

We write to you in support of your adoption of Teaching Performance Expectations and Program Standards for the PK-3 Early Childhood Education Specialist Instruction Credential. Since our founding in 2010, California Education Partners has supported over 100 districts serving over 2 million California students. Currently we are working with 25 districts to implement transitional kindergarten and create coherence for students, preschool through third grade, in the areas of early math and early literacy.

In our support of districts, we have experienced the challenge that most teachers of young children are currently not being prepared to teach their students the kind of conceptual understanding of mathematics that is required to master more advanced math. This is critical because the math children do learn in early childhood serves as the foundation for future math learning.

We believe strongly that attention to early math is an equity issue – there is already a significant achievement gap in math skills before children enter kindergarten, and multiple studies have demonstrated that this gap does not close as students progress through the grade levels in our state. In addition, children’s math skills in early childhood are highly predictive of their math achievement throughout school.

Limiting opportunities for our youngest learners to be successful in mathematics will mean that doors are closed to them as they move through school. Math achievement is a gatekeeper and difficulty with math is a major cause of dropping out of community college. A recent survey of high school students found that about 50 percent of students don’t pass college algebra with a grade of C or above and that 71 percent of high school students failed geometry exams, and 68 percent flunked Algebra 1 final exams. While math achievement is a challenge nationwide, it is important to note that among the states, California is considerably below average, and sometimes in the lowest quartile, in a number of national assessments of math proficiency.

As members of the Commission, you have taken an important step in addressing this challenge for California’s youngest learners. We urge you continue to support your adoption of Teaching Performance Expectations and Program Standards for the PK-3 Early Childhood Education Specialist Instruction Credential.

Philip Halperin  
Executive Director

Steven Kellner Ed.D.  
Director of Program Sustainability & Growth

**The Education Trust-West – Brian Rivas**

March 27, 2023

Dr. Tine Sloan  
Chair, Commission on Teacher Credentialing (CTC)  
1900 Capitol Ave.  
Sacramento, CA, 95811

Re: Proposed Amendments to Title 5 of the California Code of Regulations Pertaining to the PK-3 Early Childhood Education Specialist Credential

Dear Chair Sloan,

The Education Trust–West (ETW) would like to express its support for the PK-3 ECE Specialist Credential and comment on the need for this credential in California.

In alignment with the California Master Plan for Early Learning and Care, we believe that it is important that California has a credential that allows early learning educators to have the specialized experience they need to support child development and learning for children in preschool through 3rd grade. The rapid expansion of Transitional Kindergarten (TK) to all 4-year-olds by 2025-26 has created a high demand for TK teachers on top of the state’s existing teacher shortage. To meet the demand for this expansion, the Learning Policy Institute estimates districts will need to hire between 11,000 to 15,600 lead TK teachers<sup>1</sup>. We believe that this credential can expand and support a qualified and diverse workforce needed to meet the demands created by the expansion of TK.

Additionally, we would like to ask that the Commission also consider ways to make this credential more accessible to current early learning educators. The Center for the Study of Child Care Employment (CSCCE) highlights how California already has a diverse and qualified pool of early educators that is ready to meet the demands of the TK workforce. These early learning and care educators reflect the racial and ethnic diversity of the students in our schools, as well as have the experience and educational background to best meet those students’ needs. CSCCE found that while 76 percent of children ages 0-4 are people of color, 70 percent of center-based teachers identify as such<sup>2</sup>. This close mirroring in demographics will provide for culturally and linguistically diverse early grade educators in our schools if this credential is easily accessible to California’s early learning workforce. We want to see pathways for early educators that do not create additional barriers and we hope that the commission considers the unintentional barriers the clinical experience may impose on this pool of candidates.

We appreciate the Commission’s work on the PK-3 ECE Specialist Credential and would like to thank you for the opportunity to express our support.

Sincerely,

*Brian M. Rivas*

Brian Rivas

Senior Director of Policy and Government Relations

## ***Written Response Representing Individual in Support***

**Debbie Meadows**

March 24, 2023

TO: The Commission on Teacher Credentialing

RE: Proposed Amendments to Title 5 of the California Code of Regulations Pertaining to the PK-3 Early Childhood Education Specialist Credential

Dear Commissioners,

Thank you for the opportunity to provide comment regarding the proposed PK-3 Early Childhood credential. I bring two lenses to my comments.

1. A California multiple subject credentialed early childhood educator
  - a. 17 years of experience teaching kindergarten through second grade.
  - b. Out of state baccalaureate degree and original credential in Early Childhood Education
2. A 19-year higher education multiple subject faculty member and administrator
  - a. State Level Lead Assessor for the CalTPA Multiple Subjects Cycle 2

From these two perspectives, I know how critical it is for California educators to understand the assets and needs of our youngest students. I am pleased to see that the standards and performance expectations include a focus on ensuring teacher candidates can demonstrate and apply multiple developmental methodologies to engage and support the young children in their care.

The need to ensure our teachers are prepared with the skills and strategies needed to support the early learning of students is impactful across the state. While the multiple subject standards and TPEs provide pedagogical supports for teaching and assessment, the Early Childhood TPEs delve specifically into the needs of children from birth to age eight. This ensures both developmental and academic skills are introduced and supported. One critical area included in both the standards and TPEs is school readiness. Research shows that children who participate in high-quality ECE programs have better academic and social-emotional outcomes than those who do not ([Barnett, 2011](#); [Campbell et al., 2012](#); [Company-Córdoba, R, 2021](#)).


Additionally, it is critical to the development of these young learners that our educators are well-prepared and able to work collaboratively with families and caregivers to ensure learning continues outside of the school day. Early childhood educational foci support the efforts to close achievement gaps by ensuring all young children in California are offered the opportunity for early learning, mitigating disparities, and providing children from disadvantaged backgrounds with a stronger foundation for success in school and in life.

I applaud the team at the commission who have worked collaboratively with the Department of Education, early childhood educators, and education faculty across the state to develop, align, and refine these standards. I look forward to the completion of the bridge between current child development programs and the PK-3 credential. Hopefully this new attention will provide the opportunity for legislators across the state to call for better pay for our teachers currently holding child development permits and who are supporting our young students.

I fully support the proposed amendment to Title 5 to ensure our PK-3 teachers can learn and develop their skills to support the birth to age eight students in their care. California has put an emphasis on providing a strong foundation to our youngest students and this work is clearly and closely aligned with the mission and vision of the state.

If you have any questions, please do not hesitate to contact me.

Best regards,

A handwritten signature in blue ink that reads "Debbie Meadows". The signature is written in a cursive style with a large initial "D".

Debbie Meadows  
CSU Bakersfield  
Director, Education Assessment and Accreditation

**Deborah Stipek**

April 5, 2023

I am writing to support the implementation of the P-3 ECE Specialist Credential. A multiple credential, even with an additional 24 college units related to early childhood, is not sufficient to prepare someone to teach children as young as four years old. The additional 24 units also adds a significant burden to people who obtain a multiple credential and want to teach transitional kindergarten. This policy requires substantially more education for people teaching TK than any other grade, which is untenable given the state's huge need for TK teachers.

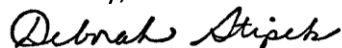
Moreover, the P-3 specialist credential program standards ensure that programs teach candidates the foundations of early childhood development and developmentally appropriate practices for supporting young children's early literacy and math skills. It also emphasizes social emotional development, which is critically important for young children and not typically addressed in multiple subject credential programs.

People with deep expertise and experience related to young children's development and learning were involved in developing the P-3 Specialist Credential and the accompanying materials (e.g., Teacher Performance Expectations and Program Standards) and the details of the planned credential have been widely vetted. The CTC staff and the Commission on Teacher Credentialing have been extraordinarily responsive to feedback. No plan will achieve complete consensus, but the current plan is excellent and widely supported by most constituencies.

The recent suggested adjustment -- to accept 200 supervised field practicum hours from community college or child development or early childhood education programs seems reasonable, as does the suggestion of offering an entry or foundational level credential authorizing service in grades preschool, TK and kindergarten for early childhood educators who enter intern programs in TK.

If we want children to benefit from California's significant investment in TK, and if we want to ensure a strong foundation for learning throughout the early grades, we need to make sure that the people who are teaching young children are well trained and supported. The P-3 Specialist Credential goes a long way toward ensuring that quality.

Sincerely,



Deborah Stipek

Judy Koch Emeritus Professor of Education



## ***Written Response Representing Individuals in Opposition***

**Cecilia Vega**

Comment:

Those of us out here preparing teachers to work in Early Childhood Education, as it has been researched for over 100 years and defined by NAEYC are extremely concerned with the lack of developmentally appropriate practices in the PK - 3 Credential.

Why replicate information from the Multi-subject Credential? Almost all elementary school teachers are not versed in brain research or development in general because it is not required of them to teach. This gap in understanding has been more and more obvious in the way that they have been teaching for some time. The results are children who are stressed, over tested and illiterate.

The more the state of California this past century has changed requirements and standards, the less prepared children and teens are when they get out of school. Everyone is rallying around making sure there is reading, writing and math skills by 3<sup>rd</sup> grade, yet no foundation is set for the preparation of that. This Pk - 3 Credential is just supporting that even more.

First it was the implementation of NCLB and we left all those children behind. With this new credential as it stands now, so much like the Multi-subject one, we will continue to leave children behind. It will be our Latino/a children left behind first, they are already doing so poorly when they get out of high school. Is this the intention?

Please review what is appropriate for pre-k - 3<sup>rd</sup> grade instruction by listening to the voices of those who truly work and know this age group and require a credential that will elevate our children.

Passing this credential as is will truly lower us to #50, as the lowest educating state in the country.

We will make Mississippi, who lacks resources and organization look better than us. How disturbing.

Please think before leaping into something that is not going to make things better. The children of the state of California deserve at least that.

**Rachel Johnson**

Comment:

The purpose of this email is to request a public hearing regarding the proposed PK-3rd teaching credential. I believe that there needs to be open dialogue around the concerned inadequacies addressed by faculty, within the process leading to the potential passing of the PK-3rd teaching

credential, inequities, systemic barriers, professional undermining etc., in reference to the proposed PK-3rd teaching credential. There needs to be open space for communication about these concerns and strategic planning with actionable changes once public opinion has been expressed.

**Heather Malley**

Comment:

Hello, I hope this finds you both well. I wanted to reach out to you for a couple of reasons. One is to ask whether I understand the timeline correctly that today is the last day to request a public hearing regarding the Notice of Proposed Rulemaking: Title 5. Education, Division 8 Commission on Teacher Credentialing? If that is accurate and still an option, I am requesting a hearing. I'll provide some context for this below. I also wanted to start to request more information for myself regarding the proposal for California's pk-3 teacher preparation, and to provide my feedback related to this.

I have studied and worked in the field of early childhood development and education since 1995 (28 years). My career has focused on direct teaching, research (UCLA's Center for Improving Child Care Quality), program evaluation (Child Care Resource Center's Research Department), and finally the practical application of this knowledge in my own preschool program which was established initially in a large family child care setting in 2010 and now in a child care center setting (since 2019).

I don't feel many like myself have had a real opportunity to provide our insight and expertise for this process, especially related to prek teaching qualifications. In the past 3 years now, providers and directors like myself have been faced with unprecedented challenges when it comes to continuing to operate our programs and support our families in the midst of a pandemic. My focus on an issue such as coming to the table about legislation regarding the future preparation of California's teachers for children as young as 2 years old has understandably been elsewhere. However, I do have a breadth of expertise and experience that I feel is valuable to this process. I also am aware that there are many stakeholders and child development professors who are likewise concerned about the curricular direction of this proposed credential and the impact it will have on children and the professionals who are currently serving them. It is only recently that I've had any bandwidth to be able to try to get up to speed on how I might be able to contribute to this very important conversation. It seems most of this conversation has taken place at a time when these stakeholders could not be present as they were in survival mode with their own programs on the front lines of essential services.

I would like some clarification, and to be directed to the appropriate documents to get myself up to speed on all the details of this curriculum. I have been able to watch some of the committee videos on YouTube and learn a little about the history of this effort. I do know that we are in a public comment period. It is important to me to contribute to this discussion and voice my concerns. Please understand that the purpose of this communication is to ensure that

this credential is aligned with developmentally appropriate practice for young children, as has been long established by the research in our field as well as by NAEYC itself. It is my understanding that the end goal you are working towards is a credential for any teacher who wants to teach 2yrs through 3rd grade. And that these individuals would have to complete an education that is consistent with what you have outlined as academically rigorous training, but that this does not encompass the serious developmental work that occurs through play and connection in emotionally supportive programs. What research is behind your proposed teacher preparation for these young ages? I am also concerned that wonderful teachers and directors who have a wealth of experience would lose their eligibility to teach in programs without a certification that takes their focus away from what is actually important for these young ages. Social emotional wellbeing has long been considered a much better indicator of future success than early reading and writing. We know this, we live it in our practices, we've seen it in the literature, we see children thrive in our programs and beyond as they travel through school and emerge successful and engaged learners.

As NAEYC's position statement on developmentally appropriate practice states, "This position statement highlights the importance of learning experiences that are meaningful to each child and that provide active engagement through play, exploration, and inquiry in ways that support the whole child—socially, emotionally, physically, and cognitively. Yet such opportunities are too often denied to young children when educational practices are not responsive to their developmental, cultural, and linguistic characteristics."

**Amanda Andrade**

Comment:

Please consider honoring the Clinical Hours that students at the community college level have earned in their Practicum classes, for the following reasons:

These Practicum courses offer rigorous practical opportunities that include teaching academic content to children, between infancy through third grade, using a developmentally appropriate approach. At ELAC we provide 108 hours as a requirement for each of our two practicum courses.

The Practicum courses include fieldwork in the classroom, directly working with children. The Practicum hours are supervised by a qualified mentor and a qualified college instructor. The Practicum student's mentor is specialized in the age group (between infancy to 3rd grade) for which the student is completing their Practicum hours. Students are asked to observe children, assess their developmental levels to plan, and implement curriculum accordingly. Students are evaluated on a consistent basis by their mentor and support staff at their Practicum site, as well as by their Practicum instructor, for a minimum of one to two times during the semester. The Practicum instructor's evaluation of the student is formal and reflects a set of teaching skills and competencies gathered from professional organizations, such as NAEYC and your agency, the CTC.

Honoring the Practicum hours would create a career path that is inclusive and equitable for those beginning their academic journey at the community college level.

Honoring the Practicum hours would validate the student's fieldwork of 108 hours, and 216 hours if they complete two semesters of practicum courses (Practicum in Child Development I and II).

Honoring the Practicum hours would show that the CTC supports the level of instruction at the community college. This would help us to partner and further align ourselves with four-year institutions (universities).

**Yadira Lopez-Arrellano**

Comment:

The purpose of this email is to request a public hearing regarding the proposed PK-3rd teaching credential. I believe there have been, and continue to be, inadequacies in the process leading to the potential passing of the PK-3rd teaching credential, as well as an immense oversight of significant deficits, inequities, systemic barriers, professional undermining etc., in reference to the proposed PK-3rd teaching credential.

**Kimberly L. Barker**

Comment:

The purpose of this email is to request a public hearing regarding the proposed PK-3rd teaching credential. I believe there have been, and continue to be, inadequacies in the process leading to the potential passing of the PK-3rd teaching credential, as well as an immense oversight of significant deficits, inequities, systemic barriers, professional undermining etc., in reference to the proposed PK-3rd teaching credential.

**Deanna Hall**

Comment:

I am writing out of concern regarding the proposed PK-3 teaching credential. Protocols have often not been followed and the expertise of the field has been ignored. Systemic barriers are being put in place (and expanded) that will disallow students to complete their education. Because of these, and many other concerns I have about the process being followed and the content of the proposed credential, I am requesting a public hearing.

**Maribel Soriano**

Comment:

Thank you for all the hard work you are doing as you move forward in developing the requirements for the PK-3 Early Childhood Education Specialist Credential. I greatly appreciate the opportunity and the space to be a voice in this process.

Here, at East Los Angeles, we work closely with our students to ensure they move toward their next academic and career goals prepared to teach children from infancy to eight years. As the cluster lead, for the seven practicum courses we offer, I can assure you that we are deeply invested in providing our students with the experiences necessary and the preparation needed to teach children in alignment with what research considers to be best and developmentally appropriate practices.

Please consider honoring the Clinical Hours that students at the community college level have earned in their Practicum classes, for the following reasons:

These Practicum courses offer rigorous practical opportunities that include teaching academic content to children, between infancy through third grade, using a developmentally appropriate approach.

The Practicum courses include fieldwork in the classroom, directly working with children.

The Practicum hours are supervised by a qualified mentor and a qualified college instructor.

The Practicum student's mentor is specialized in the age group (between infancy to 3<sup>rd</sup> grade) for which the student is completing their Practicum hours. Students are asked to observe children, assess their developmental levels to plan, and implement curriculum accordingly. Students are evaluated on a consistent basis by their mentor and support staff at their Practicum site, as well as by their Practicum instructor, for a minimum of one to two times during the semester. The Practicum instructor's evaluation of the student is formal and reflects a set of teaching skills and competencies gathered from professional organizations, such as NAEYC and your agency, the CTC.

Honoring the Practicum hours would create a career path that is inclusive and equitable for those beginning their academic journey at the community college level.

Honoring the Practicum hours would validate the student's fieldwork of 108 hours, and 216 hours if they complete two semesters of practicum courses (Practicum in Child Development I and II).

Honoring the Practicum hours would show that the CTC supports the level of instruction at the community college. This would help us to partner and further align ourselves with four-year institutions (universities).

**Susan Ferguson**

Comment:

**As a member of the academic ECE community, I have deep concerns regarding the content and timing of the current PK- 3 Credential.** There are issues that seem to need to be addressed.

When the Credential was first proposed it looked like it would be the answer to finally providing quality and appropriate educational experiences for young children in California. It looked like the experts in the ECE field were going to be listened to, respected, and followed. It looked like the comments in meetings and survey results were going to be used in the creation of each aspect of the Credential. At this time, I am not sure that is happening.

For this Credential to meet the needs of young children in PK- 3<sup>rd</sup> grade children, there needs to be a major focus on educating and hiring teachers who understand what developmentally appropriate practice is and what it looks like in the classroom. *(This especially means the PK and K curriculum must be play-based, with a balance of child-led and teacher-led activities which are focused on the current interests and needs of the children in each classroom. It means that the CA Preschool Learning Foundations, the CA Preschool Curriculum Frameworks, and the DRPD would be **required** for any program serving children 3-5. No current published curriculum offers that, nor will any step-by-step program be appropriate.)*

There must be the requirement of school district administration to participate in (and then execute at the school level) prolonged training/coaching in Developmentally Appropriate Practice, play pedagogy, etc. conducted by experts in the field.

What is the expertise of those writing the changes for this credential? Do they have classroom experience as teachers of children under the age of five? (If the majority do not, how are they qualified to make policy without using the expertise of the field?) Writing team meetings need to consist of at least 70% experts in the field.

All teaching majors need to be fully funded on a per unit basis by the state. This is an equity issue...to encourage more people to go into teaching and to tap populations that may not be able to spend up to two years without employment doing practicum/student teaching.

Temporary accreditation (five years?) for all CAP aligned CCs should be granted until a smoother, more appropriate, pathway is created that listens to the expertise of those in the field and addresses barriers. This includes a TMC from the state Chancellor's Office for a transfer degree between 2- and 4-year colleges.

The previously started program accreditation process should be continued.

Differentiate more fully the differences between TPE expectations at the 2 year, 4 year, and master levels. This should be based on the California Preschool Foundations - based on the research done for the learning foundations or eliminate TPE's for 2 - 5 (this is based on research, evidence from field experts.)

Supervised practicum lab hours must count toward required total hours from the CCs need to be put in writing - Standardize observation and practicum hours count toward the 600 required hours of teaching.

All teaching majors need to be fully funded on a per unit basis by the state. This is an equity issue...to encourage more people to go into teaching and to tap populations that may not be able to spend up to two years without employment doing practicum/student teaching.

The requirements of the proposed Credential are inequitable and continue structural and systemic racism - We know that the population of children that will be served by this credential are low-income children of color.

**Claudia Arevalo**

Comment:

My name is Claudia Arevalo. I am a West L.A. College Child Development student. I am writing this letter to express my opposition to how the current TK-3rd grade credential is written for the following reasons:

1. Marginalizing and trivializing our expertise as Early Learning Professionals/Developmentalists
2. Ignoring the contributions of Higher Education Faculty who have a strong foundation and expertise in Early Learning
3. Stigmatizing Community Colleges as having inferior programs
4. Promotion and enhancement of Systemic Racist Barriers to our current BIPOC(Black, Indigenous, People of Color) workforce

Please accept this letter and make the necessary reforms so that this credential helps our families, children, and early education workers instead of harming us.

**Carol Bluee-Walker**

Comment:

My name is Carol Bluee-Walker, I am a West L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons.

1. Marginalizing and trivializing our expertise as Early Learning Professionals/Developmentalists
2. Creating a developmentally inappropriate credential that does not serve our children 0 – 8
3. Creating inequitable barriers for students to achieve their educational goals.
4. Promotion and enhancement of Systemic Racist Barriers to our current BIPOC(Black, Indigenous, People of Color) workforce

Please accept this letter and make the necessary reforms so that this credential helps our families, children, and early education workers, instead of harming us.

**Cynthia Delao**

Comment:

Me llamo Cynthia Delao, soy una estudiante de Desarrollo de Niños de West L.A. College y le escribo esta carta con el fin de expresar mi oposición a la forma en que está escrita la credencial actual de TK-3er grado por las siguientes razones:

- 1.- Estigmatización de los colegios comunitarios por tener programas inferiores.
- 2.- Crear barreras desiguales para que los estudiantes alcancen sus metas educativas.
- 3.- Falta de responsabilidad en la calificación de alineación y evaluación de TPE (Preparación Educativa para Maestros) inapropiadas para el desarrollo.
- 4.- No utilizar los comentarios públicos para informar solo los comentarios favorables.
- 5.- Sabotear el colectivismo en los caminos de los estudiantes.
- 6.- Crear una credencial inapropiada para el desarrollo que no sirva a nuestros niños de 0 a 8 años.

Por favor acepte esta carta y hagan las reformas necesarias para que esta credencial, ayude a nuestras familias, niños y trabajadores de educación temprana, en vez que nos dañe.

**Elsa Diaz**

Comment:

My name is \_\_Elsa Diaz\_\_\_\_\_, I am a West L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons: (insert here 3-4 of some of the reasons that most affect you as a worker/student/mother/grandmother...)

1. Marginalizing and trivializing our expertise as Early Learning Professionals/Developmentalists
2. Creating inequitable barriers for students to achieve their educational goals
3. Lack of accountability in qualifying developmentally inappropriate TPE alignment and assessment.
4. Ignoring the contributions of Higher Education Faculty who have a strong foundation and expertise in Early Learning

Please accept this letter and make the necessary reforms so that this credential helps our families, children and early education workers, instead of harming us.

**Monica Jaurez**

Comment:

My name is Monica Juarez, I am a professor of Child Development at West L.A. College, mother of an early education child, and concerned ECE professional. I am writing this letter to express



my opposition to the way the current TK-3rd grade credential is written for the following reasons:

- Marginalizing and trivializing our expertise as Early Learning Professionals/Developmentalists
- Creating a developmentally inappropriate credential that does not serve our children 0 - 8
- Ignoring the contributions of Higher Education Faculty who have a strong foundation and expertise in Early Learning
- The lack of transparency that is required for a government agency to follow
- Not turning on public comment at webinars that are designated for feedback
- Not using public comment to inform their decision-making process
- Creating inequitable barriers for students to achieve their educational goals
- Promotion and enhancement of Systemic Racist Barriers to our current BIPOC (Black, Indigenous, People of Color) workforce
- Lack of accountability in qualifying developmentally inappropriate TPE alignment and assessment
- Stigmatizing Community Colleges as having inferior programs
- Sabotaging collectivism within student pathways

Our ECE students and families deserve to be heard. Please accept this letter and make the necessary reforms so that this credential helps our families, children and early education workers, instead of harming us.

**Rivka Levine**

Comment:

My name is \_\_\_\_\_, I am a West L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons:

- Marginalizing and trivializing our expertise as Early Learning Professionals/Developmentalists
- Creating a developmentally inappropriate credential that does not serve our children 0 - 8
- Ignoring the contributions of Higher Education Faculty who have a strong foundation and expertise in Early Learning
- The lack of transparency that is required for a government agency to follow

Please accept this letter and make the necessary reforms so that this credential helps our families, children and early education workers, instead of harming us.

**Maria Molina**

Comment:

My name is Maria Molina, I am a West L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3<sup>rd</sup> grade credential is written for the following reasons:

- The lack of transparency that is required for a government agency to follow
- Not turning on public comment at webinars that are designated for feedback
- Once they close public comments, they are required to leave them up so the public continues to have access to what was submitted

Please accept this letter and make the necessary reforms so that this credential helps our families, children, and early education workers, instead of harming us.

**Kimberly Ortega**

Comment:

My name is Kimberly Ortega, I am a West L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3<sup>rd</sup> grade credential is written for the following reasons are that it creates inequitable barriers for students to achieve their educational goals, the lack of accountability in qualifying developmentally inappropriate TPE alignment and assessment, and the promotion and enhancement of Systemic Racist Barriers to our current BIPOC (Black, Indigenous, People of Color) workforce.

Please accept this letter and make the necessary reforms so that this credential helps our families, children and early education workers, instead of harming us.

**Janice Silver**

Comment:

I am strongly and respectfully requesting that this credential authorization be postponed until careful review of its content and implications are completed. As a recently-retired Professor of Child Development with a career that spans over forty-five years, I have been pleased to be participating in the process and development of a credential proposal for early childhood teachers. I am, however, deeply concerned about its current form.

An Early Childhood (Specialist) Credential will elevate our profession, and should be designed to provide high quality, well prepared teachers who are knowledgeable, competent, and committed to meeting the needs of young children and their families. Higher education programs at both the community college and university levels are currently doing this, and the Early Childhood workforce is infused with well-prepared Early Childhood educators. There is a wealth of expertise in our IHEs, and a state-wide cadre of faculty members prepared to design a credential that builds on the ECE teacher preparation pathways that are already in place.

The current proposed Early Childhood Specialist Credential concerns me in several areas, but I will respond to three in particular:

### **1) Teacher Performance Expectations:**

The TPEs, while following the template of the Multi-Subject Credential, do not translate to the focus and practice of high quality ECE. Below are a few examples.

- The word “play” appears only four times in forty-one TPEs, two of which are referring to literacy and mathematical curriculum areas.
- There is limited reference to the critical idea that interactions, connections and engagement with families provide much needed support for children’s learning and positive educational outcomes. (e.g. TPE 1.3 does not mention families)
- There is no reference to the importance of authentic assessments conducted in natural settings during play based, child-initiated activities.
- Because the TPAs have not yet been developed and approved, there is no guarantee that developmentally appropriate TPEs will be met.

### **2) Twenty-four Unit Subject Matter Requirement:**

I am particularly concerned about the lack of specificity about the required 24 units of ChDev/ECE.

- Twenty-four units are a minimal requirement to provide a foundation of knowledge and competencies required to understand how to meet the needs of young children and to facilitate developmentally appropriate learning environments and experiences for them. It is essential that these units contain the depth and breadth of content, competencies and experiences that provide this foundation. Without clarification of required course content, candidates could have completed units not directly applicable to classroom practice. Without adequate foundation, practices are at risk of being at the least inappropriate, and at the worst, dangerous for healthy development.
- The community college AS-T degree clearly defines the courses that meet the transfer requirements. Analysis of the content and experiences included in these courses provides a reference for inclusive requirements.

### **3) Clinical Hours Requirement:**

- Practicum hours earned at community colleges are completed under the supervision of the course faculty members in carefully chosen early childhood programs often taught by state approved California Early Childhood Mentor Teachers. These teachers are selected for their high-quality practices and environments, and are in regular contact with the faculty members and each other. They undergo regular certifications to ensure that their programs maintain high quality standards. These hours must be recognized in the credential clinical hours requirement.
- As a practicum instructor visiting students in their employment settings, I often visited TK classrooms. Of the many instances that were deeply troubling, two stand out:
  - Twenty-four children sat around a large rectangle of tables with pencils and paper worksheets copying a written sentence from the white board. Ongoing fidgeting and frustration were addressed by reminding them

that work time would be over in twenty minutes and then there would be recess.

- In another classroom, children were sent alone, one by one to a cubicle to be tested in paper and pencil tasks. They were told that if they didn't know an answer they could skip it and move the next. Children demonstrated anxiety and confusion.

The idea that placements in these two classrooms could fulfill the required clinical hours for the credential is alarming.

This Early Childhood Specialist Credential proposal needs much more work. I strongly request that this process be removed from its current timeline until adequate revisions can be implemented based on recommendations from early childhood professionals and research. I strongly encourage CTC to acknowledge the objections and recommendations from the leadership of the IHEs that are currently meeting the urgent needs of the ECE workforce.

Respectfully, Janice Silver, Professor Emerita

**Kyla Smith**

Comment:

My name is Kyla Smith, I am a West L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons: As a long lived dream of making child development my career and business this affects me. This disproportionately affects women of color who have home-based child care programs and businesses.

1. Creating a developmentally inappropriate credential that does not serve our children 0 - 8
2. Creating inequitable barriers for students to achieve their educational goals
3. Promotion and enhancement of Systemic Racist Barriers to our current BIPOC (Black, Indigenous, People of Color) workforce
4. Lack of accountability in qualifying developmentally inappropriate TPE alignment and assessment.

Please accept this letter and make the necessary reforms so that this credential helps our families, children and early education workers, instead of harming us.

**Angela Vasquez**

Comment:

Me llamo Angela Vasquez, soy una estudiante de Desarrollo de Niños de West L.A. College y le escribo esta carta con el fin de expresar mi oposición a la forma en que está escrita la credencial actual de TK-3er grado por las siguientes razones:

1. Yo no puedo apoyar esta ley que están proponiendo porque afectaría a las mujeres de color que ya tienen programas de cuidado infantil en el hogar. Esto afectaría sus ingresos económicos para ellas y sus familias.
2. Esto causaría que haya más niños en las aulas y que tengan menos enfoque en cada niño. Las escuelas ya casi tienen 30 niños en las aulas con solo uno/a maestro/a y la mayoría de veces sin asistentes. Esto causa efecto en su desarrollo cognitivo y emocional pero más en su aprendizaje escolar porque no están aprendiendo lo que deberían.
3. La falta de transparencia que se requiere para que una agencia gubernamental siga. Esto prohíbe que los padres estén informados de la realidad de esta ley. Por ejemplo, proponer que será una mejor alternativa cuando en realidad no es real porque no están explicando cómo están educando y falta de preparación.
4. Por última la falta de responsabilidad en la calificación de alineación y evaluación de TPE inapropiadas para el desarrollo. Este programa no tendría los objetivos y metas académicas que se requieren porque el gobierno ya tiene los requisitos necesarios que determinan los niveles de educación que cada estudiante debe pasar.

Por favor acepten esta carta y hagan las reformas necesarias para que esta credencial ayude a nuestras familias, niños y trabajadores de educación temprana, en vez de que nos dañe.

### **Elizabeth Alvarez**

Comment:

My name is Elizabeth Alvarez, I am an East Los Angeles College Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written.

I understand that this credential is meant to provide teachers with the training and qualifications needed to teach younger students, but I am worried that it may not be the best solution.

For starters, the PK-3rd credential may not be enough to prepare teachers for the challenges of teaching young children. Teaching children at this age requires a unique set of skills and knowledge that is not necessarily covered by this credential. Additionally, I am worried that the credential may lead to a shortage of teachers in the state, as it may be more difficult to find teachers who are qualified to teach both the younger and older students.

I understand the need to provide teachers with the necessary qualifications to teach young students, but I am concerned that this credential may not be the best solution.

Some of my concerns include:

- The marginalization and trivialization of our expertise as Early Learning Professionals/Developmentalists, as well as the creation of a developmentally inappropriate credential that does not serve our children 0 - 8.
- The government agency has been criticized for ignoring the contributions of Higher Education Faculty who have a strong foundation and expertise in Early Learning, not

being transparent in their decision-making process, and failing to solicit public feedback at designated webinars.

- After public comments are closed, they must remain accessible to the public. This allows continued access to what was submitted and prevents any misinformation.
- Creating obstacles that prevent students from achieving their educational goals creates inequality. Systemic racism also disproportionately affects Black, Indigenous, and People of Color when it comes to employment opportunities. Furthermore, TPE alignment and assessment are often not developmentally appropriate, resulting in a lack of accountability.
- Discredit Community Colleges by deeming their programs as inferior.
- Hinder the progression of students by preventing them from coming together to form a collective.

In conclusion, I urge the CTC to consider the implications of this proposed credential and the potential effects it may have on the students, teachers, and communities of California. I believe it is important to find a solution that is beneficial to all parties involved.

I hope that the CTC will consider my concerns and find a more suitable solution that will meet the needs of both students and teachers.

Please accept this letter and make the necessary reforms so that this credential helps our families, children and early education workers, instead of harming us.

### **Guadalupe Cabrera**

Comment:

Mi nombre es Guadalupe Cabrera, soy una estudiante de Desarrollo de niños de West L.A. College y le escribo esta carta con el fin

de expresar mi oposición a la forma en que está escrita la credencial actual de TK- 3er grado por las siguientes razones . Soy madre y estudiante por lo tanto me veo afectada por las siguientes razones.

1. Que implementen prácticas que son desarrolladamente apropiadas para niños de 0 -8 años de edad
2. Que faciliten actividades de aprendizaje a lo largo de este rango de grado que involucren a los estudiantes de acuerdo con sus niveles de desarrollo.
- 3 . Las actividades de aprendizaje en el aula deben tener en cuenta y valorar las experiencias cognitivas, sociales, emocionales, lingüísticas y culturales de cada niño .
- 4 . Otras características, activos y habilidades de antecedentes relevantes, así como cualquier área de necesidades especiales. Las prácticas apropiadas para el desarrollo fomentan el aprendizaje alegre de los niños pequeños y ayudan a maximizar las oportunidades para que todos los niños alcancen su máximo potencial .

5 . El propósito de enviar este mensaje es para que la igualdad para todo profesional que tiene las habilidades profesional y conocimiento y la educación especializada en desarrollo infantil y aprendizaje temprano.

Por favor acepte esta carta y hagan las reformas necesarias para que este credencial ayude a nuestras familias.

Niños y trabajadores de educación temprana, en vez que nos dañe .

**Crisanta Cox**

Comment:

I am writing to express my strong opposition to the way the current TK-3<sup>rd</sup> grade credential is written. As a West LA College Child Development student and someone who has worked in this field for a few years, I have witnessed firsthand the negative impact that these policies will have on our children and our workforce.

One of my major concerns is that your commission is marginalizing and trivializing the expertise of Early Learning Professionals and Developmentalists. Instead of valuing the knowledge and experience of these individuals, your commission has created a developmentally inappropriate credential that does not serve children ages 0-8. This is a serious issue, as it undermines the very foundation of our profession and puts our children's future at risk.

Furthermore, I am deeply concerned that your commission is ignoring the contributions of Higher Education Faculty who have a strong foundation and expertise in Early Learning. These individuals have spent years studying and researching the best practices for educating young children, yet your commission seems to be disregarding their input and expertise.

Another issue that concerns me is the lack of transparency that is required for a government commission to follow. Your commission has not turned-on public comments at webinars designated for feedback and once they close public comments, they are required to leave them up, so the public continues to have access to what was submitted. This lack of transparency makes it difficult for us to know what decisions are being made and how they are being made.

In addition, I am deeply troubled by the fact that your commission is not using public comment to inform its decision-making process. Instead, it seems to be falsifying public comment by only reporting the favorable comments. This is a serious violation of our democratic principles and undermines the very foundation of our society.

Finally, the lack of accountability in qualifying developmentally inappropriate TPE alignment and assessment is a major concern. These issues pose a serious threat to our children's future and the future of our profession. I urge your commission to reconsider these policies and to consider the concerns of Early Learning Professionals and Developmentalists.

Please accept this letter and make the necessary reforms so that this credential helps our families, children, and early education, instead of harming us.

**Sandra Cuellar**

Comment:

Me llamo Sandra Cuellar, soy una estudiante de Desarrollo de Niños de West L.A. College y le escribo esta carta con el fin de expresar mi oposición a la forma en que está escrita la credencial actual de TK-3er grado por las siguientes razones:

- Ignorar las contribuciones de los docentes de educación superior que tienen una base sólida y experiencia en el aprendizaje temprano
- No activar los comentarios públicos en los seminarios web designados para comentarios
- Una vez que cierran los comentarios públicos, deben dejarlos abiertos para que el público siga teniendo acceso a lo que se envió.
- No utilizar los comentarios públicos para informar su proceso de toma de decisiones.
- Falsificar comentarios públicos al informar solo los comentarios favorables
- Crear barreras desiguales para que los estudiantes alcancen sus metas educativas

Por favor acepte esta carta y hagan las reformas necesarias para que esta credencial ayude a nuestras familias, niños y trabajadores de educación temprana, en vez de que nos dañe.

**Carolina Guevara**

Comment:

Me llamo Carolina Guevara, soy una estudiante de Desarrollo de Niños de West L.A. College y le escribo esta carta con el fin de expresar mi oposición a la forma en que está escrita la credencial actual de TK-3er grado por las siguientes razones:

1. Falta de responsabilidad en la calificación de alineación y evaluación de TPE (Preparación Educativas para Maestros) inapropiadas para el desarrollo.
2. Crear una credencial inapropiada para el desarrollo que no sirva a nuestros niños de 0 a 8 años
3. Falta de responsabilidad en la calificación de alineación y evaluación de TPE (Preparación Educativas para Maestros) inapropiadas para el desarrollo.
4. Crear barreras desiguales para que los estudiantes alcancen sus metas educativas

Por favor acepte esta carta y hagan las reformas necesarias para que esta credencial ayude a nuestras familias, niños y trabajadores de educación temprana, en vez de que nos dañe.



**Milbian Hernandez**

Comment:

Me llamo Milbian Hernández, soy una estudiante de Desarrollo de Niños de West L.A. College y le escribo esta carta con el fin de expresar mi oposición a la forma en que está escrita la credencial actual de TK-3er grado por las siguientes razones: (inserte aquí 3-4 de algunas de las razones que más le afectan a usted como trabajadora/estudiante/mamá/abuela....)

1. Crear una credencial inapropiada para el desarrollo que no sirva a nuestros niños de 0 a 8 años.
2. Ignorar las contribuciones de los docentes de educación superior que tienen base sólida y experiencia en el aprendizaje temprano.
3. No utilizar los comentarios públicos, para informar su proceso de toma de decisiones.
4. Crear barreras desiguales para los estudiantes alcancen sus metas educativas.

Por favor acepte esta carta y hagan las reformas necesarias para que esta credencial ayude a nuestras familias, niños y trabajadores de educación temprana, en vez de que nos dañe.

**Enrique Marshall**

Comment:

Dear Commission on Teacher Credentialing, Christina Villanueva, and Sandra Burwick:

My name is Enrique Marshall, I am a West L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons:

1. Stigmatizing Community Colleges as having inferior programs
2. Sabotaging collectivism within student pathways
3. Creating inequitable barriers for students to achieve their educational goals
4. Promotion and enhancement of Systemic Racist Barriers to our current BIPOC (Black, Indigenous, People of Color) workforce

Please accept this letter and make the necessary reforms so that this credential helps our families, children and early education workers, instead of harming us.

Sincerely,  
Enrique Marshall  
Student, West L.A. College

**Amanda Martinez**

Comment:

My name is Amanda Martinez, I am a West L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons:

1. The lack of transparency during the entire process. The handling of public comments is inadequate for government agency policy. Public comments should be accessible for any community stakeholders that wish to weigh in, by turning off public comments during webinars, the agency is effectively censoring the people that would be most affected by these policies.
2. Not using public comments to inform the decision-making process shows a disregard to the community that this policy is purported to serve. Public comments are a necessity to gauge the needs of communities, particularly when these communities stand to be most affected.
3. This policy would effectively be taking students away from home-based childcare programs. The public school system is already under enough strain as evidenced by recent unrest within school districts. Advocating for a system that would place burdens on both home-based systems as well as public schools is short-sighted.
4. The stigmatization of the community college system within this proposal is harmful to disadvantaged communities. Community college serves these communities by providing low-cost higher education with a pathway into the university system. Many community college students also use the system to gain certifications required for employment. The implication that these programs are inferior would disproportionately affect particular groups of students and continue the promotion of systemic racism.

Please accept this letter and make the necessary reforms so that this credential helps our families, children, and early education workers, instead of harming us.

**Hilda Ordaz**

Comment:

My name is Hilda Ordaz, I am a West L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons:

1. Ignoring the contributions of Higher Education Faculty who have a strong foundation and expertise in Early Learning.
2. Promotion and enhancement of Systemic Racist Barriers to our current BIPOC(Black, Indigenous, People of Color) workforce.
3. Creating inequitable barriers for students to achieve their educational goals.
4. Stigmatizing Community Colleges as having inferior programs by sabotaging collectivism within student pathways.

Please accept this letter and make the necessary reforms so that this credential helps our families, children and early education workers, instead of harming us.

**Johanna Zepeda Dubon**

Comment:

My name is Johanna Zepeda, I am a West L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons:

- 1.The practices presented in the credential are not developmentally appropriate for children 0-8 years of age
2. This credential will affect preschool programs due to losing 4-5 year olds to public schools
- 3.Ignoring the contributions of Higher Education Faculty who have a strong foundation and expertise in Early Learning
- 4.Lack of accountability in qualifying developmentally inappropriate TPE alignment and assessment.

Please accept this letter and make the necessary reforms so that this credential helps our families, children and early education workers, instead of harming us.

**Jennifer Calderon**

Comment:

Dear Commission on Teacher Credentialing, Christina Villanueva, and Sandra Burwick:  
My name is Jennifer Calderon, I am a West L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons:

1. Many Head Start centers and home base day care centers will be mandatory to be shut down leading many teachers/caregivers to be without a job. Some of these teachers and caregivers are the primary providers for their family.
2. Parents will be obligated to find alternative choices for transportation or changes of work schedules.
3. The capacity of children attending preschool programs could be different than in public classrooms. Based on the ratio, it is more flexible for preschool teachers to experience one-on-one interactions with a child than in a public school. Overcapacity in a classroom could determine how a teacher could focus on a child's individual development growth.
4. Head start program's funding will dramatically decrease, not only would the head start teachers be affected but overall, other staff trying to run an organization for low-income families.

Please accept this letter and make the necessary reforms so that this credential helps our families, children, and early education workers, instead of harming us.

Sincerely,  
Jennifer Calderon  
Student, West L.A. College

**Elizabeth Garay**

Comment:

Me llamo María Elizabeth Garay, soy una estudiante de Desarrollo de Niños de West L.A. Collage y le escribo esta carta con el fin de expresar mi oposición a la forma en que está escrita la credencial actual de TK-3er grado por las siguientes razones:

1. Soy mamá de dos hermosos Niños y las edades están entre 8 y 5 años las cuales como madre primeriza no sabía como buscar ayuda con mi primer hijo todo era muy confuso llegué pidiendo ayuda con mi primer hijo por qué él tenía 4 años y no sabía hablar y pensé que en la escuela me iban a ayudar la cual me mandaron para otro lugar que se llama HEAD STAR el cual me dijeron que no podían ayudarme por qué él no iba al baño solo.
2. Cuando las maestras o maestros no tienen la educación especial para entender a un niño que apenas va conociendo como es la escuela es difícil, hay muchos niños que para ellos es muy traumático ir a la escuela, en el caso de Joel mi hijo de 8 años no fue diagnosticado con AUTISMO desde temprana edad si no apenas hace unos meses Joel está en la escuela desde TK y siempre me dijeron que yo estaba mal.
3. Impotencia es lo que siente los padres cuando van con alguien profesional que no está con la educación especial de entender el DESARROLLO Y CRECIMIENTO EN LA NIÑEZ es muy importante saber educar a nuestros docentes y saber el principio de todo es muy fundamental para el bienestar de todos y más para nuestros niños del futuro.
4. Beneficios de poder desempeñar este aprendizaje el cual desde que lo escuche me puse a penar porque no lo conocí antes porque siendo latina no tenemos las oportunidades de saber cómo poder entender a los más indefensos y poder comprenderlos desde temprana edad el futuro de educar no ha pasado de moda y no es tarde para dar una giro de 360 grados, pero no quedarnos en lo mismo si no decir al contrario hicimos un cambio empezamos de 0, pero con más educación y más oportunidades para nuestras nuevas docentes con Instrucción de Especialista en Educación de la Primera Infancia (ECE) de PK-3 y lo más importante ser transparentes con hechos y oportunidades saber aprovechar el potencial que hay en nuestra comunidad (Negra, Indígena, Gente Latina) y mejora de Barreras Racistas Sistémicas que hay en este país.

Por favor acepte esta carta y hagan las reformas necesarias para que esta credencial ayude a nuestras familias, niños y trabajadores de educación temprana, en vez de que nos dañe.

## Denise Kennedy

### Comment:

This letter is to serve as written comment on the PK-3 ECE Specialist Instruction Credential. As someone that has been teaching in higher education in Child Development/Early Childhood Education, this credential is not and will not serve the children and families in California with unprepared teachers. There are several issues that we in higher education and in particular in 4-year universities that prepare teachers to have with this credential.

First, the 24-unit requirement for the apportionment of funds for Ed Code 48000 was supposed to be temporary. It was extended and now made permanent to satisfy the teachers union and not in the interest of children. This means that any lower-division course at a community college in CD or ECE counts toward this credential. It can be a course on how to write a resume in child development. This tells the field that CTC equates any 24 units to subject matter. The fact that a multiple subjects credential holder with 24 units simply applies for the PK-3 credential and it will be granted is ludicrous. The 24 units should sunset so that existing MC credential holders can get some basic understanding of development and teach TK. Those of us in the field as the disciplinary experts know that any basic 24 units are not enough to prepare a quality teacher. Option 2 needs to sunset. With option 2, districts want a MS Credential and 24 units which we know is not what is best for the children. School districts are already using loopholes where MS credential holders are only taking 6 units of CD/ECE to teach TK. There is no accountability for the 24-unit apportionment by CTC. The CSET is the current approved examination that is taken by credential candidates to fulfill the basic educational technology requirements for a Multiple or Single Subject Teaching Credential or an Education Specialist Instruction Credential. This does not exist for the PK-3 Credential and I argue one should be created to replace 24 units. Please, think about what is best for the children not for the adults.

Secondly, the current TPEs and Standards are a clear push-down of K-5 into early childhood. Again, with the lack of knowledge and understanding of early childhood education and pedagogy, this push-down will not create qualified teachers. Early childhood pedagogy is integrated, meaning that we teach children all domains of development often in one lesson. For example, when teaching math, we incorporate vocabulary, social and emotional development, and physical development in one math lesson. Lack of innovation and pushing down current standards for this new credential is not transformative in any way. CTC really needs to hire consultants and staff that are familiar with Baccalaureate programs in early childhood education that feed into the credential programs. Unfortunately, there is no one at CTC with this qualification so the perspective is skewed toward community colleges. There is also no TPA for this credential until 2-25 so why is this moving forward without every piece in place? Why would a PK-3 credential student have to take and pass a MS Credential TPA? Does this make sense to anyone? Or again is it so clear that the push down of K standards to TK is so clear that a new TPA is meaningless?

Third, there are so many barriers and inequities with this new credential. Currently, most preschool teachers are much more diverse and represent the children that they serve, while K-5

teachers are not diverse nor do they represent the BIPOC children they serve. Current lead preschool teachers (many holding a master's degree) are told they are not qualified to teach TK. These teachers have been teaching 4-year-olds for many years and are much more qualified than the multiple subjects 3rd-grade teachers. Yet, this preschool teacher must go back and apply to be in a credential program while the 3<sup>rd</sup>-grade teacher can take 24 online community college units that have nothing to do with teaching.

Finally, those of us in the early childhood education field have participated in various CTC workgroups, design teams, focus groups, and the like. We have offered expertise in these endeavors and often that expertise has been ignored. Honestly, I personally have been told that a PDGR grant with a designated scope of work was the reason for the work even though it was meaningless at that point. So essentially, a box was being checked for the SOW. Our input has been misrepresented at Commission meetings by CTC to present a "positive" spin on focus group information when in reality the input was not positive. This misrepresentation has led to many of us not wanting to participate and distrusting the work that CTC is conducting. With so much funding and work given to CTC yet no one that participates in CTC design teams is paid showing a lack of respect for our expertise.

### **Carla Morales**

Comment:

Me llamo Carla Morales, soy una estudiante de Desarrollo de Niños de West L.A, College y le escribo esta carta con el fin de expresar mi oposición a la forma en que está escrita la credencial actual de TK-3er grado por las siguientes razones:

1. Crear una credencial inapropiada para el desarrollo que no sirva a nuestros niños de 0 a 8 años.
2. Falta de responsabilidad en la calificación de alineación y evaluación de TPE (Preparación Educativas para Maestros) inapropiadas para el desarrollo.
3. Ignorar las contribuciones de los docentes de educación superior que tienen una base sólida y experiencia en el aprendizaje temprano.
4. Estigmatización de los colegios comunitarios por tener programas inferiores.

Por favor acepte esta carta y hagan las reformas necesarias para que esta credencial ayude a nuestras familias, niños y trabajadores de educación temprana, en vez de que nos dañe.

### **Leticia Moya**

Comment:

Me llamo, Leticia Moya, soy una estudiante de Desarrollo de Niños de West L.A. College y le escribo esta carta con el fin de expresar mi oposición a la forma en que está escrita la credencial actual de TK-3er grado por las siguientes razones:

1. Marginar y trivializar nuestra experiencia como profesionales/desarrolladores del aprendizaje temprano.
2. Falta de responsabilidad en la calificación de alineación y evaluación de TPE (Preparación Educativas para Maestros) inapropiadas para el desarrollo.
3. Promoción y mejora de las Barreras Racistas Sistémicas para nuestra fuerza laboral actual BIPOC (Negra, Indígena, Gente de Color)
4. Crear una credencial inapropiada para el desarrollo que no sirva a nuestros niños de 0 a 8 años.

Por favor acepte esta carta y hagan las reformas necesarias para que esta credencial ayude a nuestras familias, niños y trabajadores de educación temprana, en vez de que nos dañe.

**Janeth Sanchez**

Comment:

Estimada Comisión de Acreditación de Maestros, Christina Villanueva, y Sandra Burwick

Me llamo Janeth Sanchez ,soy una estudiante de Desarrollo de Niños de West L A Collage y le escribo esta carta con el fin de expresar mi oposición a la forma en que está escrita la credencial actual de TK-3er grado por las siguientes razones:

1. Como padres nos preocupa saber que el sistema escolar piensa más en la alta demanda de estudiantes sin importar la necesidad individual. Principalmente de los estudiantes más pequeños.
2. Los programas gratuitos; para la primera infancia, ofrecido por el distrito escolar, buscan la mayor cantidad de enrolamientos causando así recarga laboral a maestros sin culminar sus estudios Universitarios causando un impacto desfavorable en cada niño siendo fomentadores directos del desarrollo infantil como un proceso desfavorable.
3. Como estudiante de Desarrollo Infantil y que me estoy especializando exclusivamente en esta área sería bajas las posibilidades de ejercer mi carrera en un futuro en este campo laboral.

Por lo tanto, acepte esta carta y hagan las reformas necesarias para que esta credencial ayude a nuestras familias, niños y trabajadores de educación temprana, en vez de perjudicarnos.

Sinceramente,

Janeth Sanchez.

**Uniquee' Clark**

Comment:

My name is Uniquee' Clark, I am a West L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons:

1. As a mother i can't get all the resources that i need as a College student because of the Systemic Racist Barriers Workforce.
2. Not being able to post public comments to inform their decision-making process.
3. Not turning on public comment at webinars that are designated for feedback, us parent's, teachers and others who have real concerns would love to be able to comment on what's serious and just as important as you.
4. Once they close public comments, they are required to leave them up so the public continues to have access to what was submitted. Having an open eye and knowing that our concerns have been answered or brought into suggestion would be good to know that they are important to you.

Please accept this letter and make the necessary reforms so that this credential helps our families, children and early education workers, instead of harming us.

### **Amalio Escalante**

#### **Comment:**

My name is Amalio Escalante. I am a West L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons:

I strongly oppose the current PK-3 Early Childhood Education Specialist Instruction Credential. As a student, I have seen the devastating effects this credential will have on our families, children, and early education workers. I am writing this letter to express my opposition to the way the current TK-3rd

1. The credential marginalizes and trivializes the expertise of Early Learning Professionals/Developmentalists. Those with specialized education and knowledge in child development and early learning are being ignored, and this undermines the professionalism of those working in the field.
2. The credential is developmentally inappropriate and does not serve our children aged 0-8. The lack of consideration for children's cognitive, social, emotional, linguistic, and cultural experiences, as well as their special needs, will have negative impacts on their learning and development.
3. The lack of transparency in the process the CTC has used and the failure to turn on public comment at webinars that are designated for feedback, prevents those who are most affected by the credential from voicing their concerns and contributing to the decision-making process.
4. The promotion and enhancement of systemic racist barriers to our current BIPOC workforce creates unfair barriers for students to achieve their educational goals, stigmatizes community colleges as having inferior programs, and sabotages collectivism within student pathways.



I urge the CTC to take these concerns seriously and make the necessary improvement to make sure that this credential helps our families, children, and early education workers instead of harming us. Thank you for your attention to this matter.

**Evelin Lopez**

Comment:

Me llamo Evelin Lopez, soy una estudiante de Desarrollo de Niños de West L.A. College y le escribo esta carta con el fin de expresar mi oposición a la forma en que está escrita la credencial actual de TK-3er grado por las siguientes razones:

1. Crea una estigmatización de los colegios comunitarios por tener programas inferiores
2. Se está creando una credencial inapropiada para el desarrollo que no le sirve a nuestros niños de 0 a 8 años.
3. Margina y trivializa nuestra experiencia como profesionales/desarrolladores del aprendizaje temprano.

Por favor acepte esta carta y hagan las reformas necesarias para que esta credencial ayude a nuestras familias, niños y trabajadores de educación temprana, en vez de que nos dañe.

**Cecilia Muñoz**

Comment:

Me llamo Cecilia Muñoz, soy una estudiante de Desarrollo de Niños de West L.A. College y le escribo esta carta con el fin de expresar mi oposición a la forma en que está escrita la credencial actual de TK-3er grado por las siguientes razones: (inserte aquí 3-4 de algunas de las razones que más le afectan a usted como trabajadora/estudiante/mamá/abuela....)

1. Marginar y trivializar nuestra experiencia como profesionales/desarrolladores del aprendizaje temprano
2. Crear una credencial inapropiada para el desarrollo que no sirva a nuestros niños de 0 a 8 años
3. Ignorar las contribuciones de los docentes de educación superior que tienen una base sólida y experiencia en el aprendizaje temprano
4. Ignorar las contribuciones de los docentes de educación superior que tienen una base sólida y experiencia en el aprendizaje temprano

Por favor acepte esta carta y hagan las reformas necesarias para que esta credencial ayude a nuestras familias, niños y trabajadores de educación temprana, en vez de que nos dañe.

**Tina Palacios**

Comment:

My name is Tina Palacios, and I am a West L.A. College Child Development student. I am writing this letter to express my opposition to how the current TK-3rd grade credential is written; not only will it affect children starting school in the fall, but in the long run.

1. Sabotaging collectivism within student pathways.
2. Creating inequitable barriers for students to achieve their educational goals.
3. Creating a developmentally inappropriate credential that does not serve our children 0 – 8.
4. Promotion and enhancement of Systemic Racist Barriers to our current BIPOC(Black, Indigenous, People of Color) workforce.

Please accept this letter and make the necessary reforms so that this credential helps our families, children, and early education workers, instead of harming us.

**Alicia Cristina Perez**

Comment:

Estimada Comisión de Acreditación de Maestros, Christina Villanueva, y Sandra Burwick:

Me llamo Alicia Cristina Pérez, soy una estudiante de Desarrollo de Niños de West L.A. College y le escribo esta carta con el fin de expresar mi oposición a la forma en que está escrita la credencial actual de TK-3er grado por las siguientes razones:

1. Crear una credencial inapropiada para el desarrollo que no sea útil para nuestros niños de 0 a 8 años.
2. Marginalizar y trivializar nuestra experiencia como profesionales/desarrolladores del aprendizaje temprano.
3. Crear barreras desiguales para que los estudiantes alcancen sus metas educativas.
4. alta de responsabilidad en la calificación de alineación y evaluación de TPE (Preparación Educativas para Maestros) inapropiadas para el desarrollo.

Por favor acepte esta carta y hagan las reformas necesarias para que este credencial ayude a nuestras familias, niños y trabajadores de educación temprana, en vez de que nos dañe.

Sinceramente,  
Alicia Cristina Pérez  
Estudiante de West L.A. College

**Gracielita Plaza**

Comment:

My name is Gracielita Plaza, I am a West L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons. First off, I would like to mention the lack of ability for people attending the webinars and there being no comment section. How are we suppose to give feedback, make comments or even ask questions. How are you able to know if we fully understand the information you are giving us. Secondly, only allowing individuals to see comments that are in your favor, as if everything was understood, liked and praised. You do not want or are not allowing anyone show their disapproval or willing to work with us to make the TK-3<sup>rd</sup> grade Credential better for these children.

With everything, you are only creating a barrier for these children to achieve an educational goal. Instead of helping and making things easier, you are making things even more difficult. You are actively sabotaging these childrens future and every individual trying to help them.

Please accept this letter and make the necessary reforms so that this credential helps our families, children and early education workers, instead of harming us.

**Elsa Ramirez**

Comment:

Me llamo Elsa Ramirez, soy una estudiante de Desarrollo de Niños de West L.A. College y le escribo esta carta con el fin de expresar mi oposición a la forma en que está escrita la credencial actual de TK-3er grado por las siguientes razones:

1. Falta de responsabilidad en la calificación de alineación y evaluación de TPE (Preparación Educativas para Maestros) inapropiadas para el desarrollo .
2. Crear una credencial inapropiada para el desarrollo que no sirva a nuestros niños de 0 a 8 años.
3. Crear barreras desiguales para que los estudiantes alcancen sus metas educativas .
4. Marginar y trivializar nuestra experiencia como profesionales/desarrolladores del aprendizaje temprano

Por favor acepte esta carta y hagan las reformas necesarias para que este credencial ayude a nuestras familias, niños y trabajadores de educación temprana, en vez de que nos dañe.

**Nayely Ruano**

Comment:

Estimada Comisión de Acreditación de Maestros, Christina Villanueva, y Sandra Burwick:

Me llamo Nayely Manriquez soy una estudiante de Desarrollo de Niños de West L.A. College y le escribo esta carta con el fin de expresar mi oposición a la forma en que está escrita la credencial actual de TK-3er grado por las siguientes razones:

1. La credencial no contiene lenguaje ni prácticas que son desarrolladamente para niños de 0 a 8 años de edad.
2. Afectará los programas preescolares ya afectados por causa de programas como TK y ETK, ya que perderán niños de 4 a 5 años en esas aulas en los sistemas de escuela pública. Esto afecta a mujeres de color que tienen programas y negocios de cuidado infantil en el hogar.
3. Margina y trivializa nuestra experiencia como profesionales/desarrolladores del aprendizaje temprana
4. Ignoran las contribuciones de los docentes de educación superior que tienen una base sólida y experiencia en el aprendizaje temprano.

Por favor acepten esta carta y hagan las reformas necesarias para que esta credencial ayude a nuestras familias, niños y trabajadores de educación temprana, en vez de que nos dañe.

Sinceramente,

Nayely Manriquez

Estudiante de West L.A. College

**Maria Sanchez**

Comment:

My name is Maria Sanchez, I am an East L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons:

1. Creating a developmentally inappropriate credential that doesn't help serve our children from ages 0-8, isn't beneficial because the goal is to support children of all ages and receive the best education in development and learning and allows us as a worker to understand the child through their culture, community, and family.
2. This CTC only focuses on a certain age group, focusing on certain age groups allows for children under the age of 3 to not develop correctly the way in certain areas such as in their language, and aren't implementing the adequate needs for each child who needs

this help parents who have children in these age ranges need the support from programs like these to serve their children in all areas.

3. If no actions are done to make this program a change it will affect lots of families who are in the need of programs that help suit their child's needs or provide the best knowledge for their children, bringing in professionals who have the appropriate skills and knowledge who are specialized in the education of child development and early learning can bring the foundational preparation to set these children for success.

Please accept this letter and make the necessary reforms so that this credential helps our families, children and early education workers, instead of harming us.

**Maria Juarez**

Comment:

Dear Commission on Teacher Credentialing, Christina Villanueva, and Sandra Burwick:  
My name is Maria Juarez, I am an East L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons: (insert here 3-4 of some of the reasons that most affect you as a worker/student/mother/grandmother...)

1. Creating inequitable barriers for students to achieve their educational goals.
2. Promotion and enhancement of Systemic Racist Barriers to our current BIPOC(Black, Indigenous, People of Color) workforce.
3. Marginalizing and trivializing our expertise as Early Learning Professionals/Developmentalists.
4. Creating a developmentally inappropriate credential that does not serve our children 0 - 8

Please accept this letter and make the necessary reforms so that this credential helps our families, children, and early education workers, instead of harming us.

Sincerely,

Maria Juarez

Student, East L.A. College

**Sharon Donovan**

Comment:

Its not too late to do what's best for the children of California! As Child Development Faculty Emerita at City College of San Francisco, I join colleagues across the state to urge a halt to the proposed Pre-K Credential. In its current form it will cause enormous harm to children and their teachers.

The stipulations for 24 units of Early Childhood education, the practicum, the Teacher Performance Expectations, and pathways for teacher preparation are nowhere near ready. We have the California Learning Foundations and Frameworks, and Early Childhood Educator Competencies which were based on solid developmental research. These should inform the way forward for California's youngest children, not a narrow emphasis on Multiple Subjects.

Rushing ahead without a solid plan and the mechanisms to make that plan successful will not meet the educational or developmental goals for young children, and will further exacerbate the inequities of the Early Care and Education workforce.

**Ricardo Garcia**

Comment:

My name is Ricardo Garcia, I am an East L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons:

1. Not turning on public comment at webinars that are designated for feedback. Additionally, once the public comments are closed, the public does not have access to what was submitted as they are not left up.
2. Promotion and enhancement of Systemic Racist Barriers to our current BIPOC (Black, Indigenous, People of Color) workforce.
3. Stigmatizing Community College as having inferior programs.
4. Sabotaging collectivism within student pathways.

Please accept this letter and make the necessary reforms so that this credential helps our families, children, and early education workers, instead of harming us.

**Monica Gonzalez**

Comment:

My name is Monica Gonzalez. I am a West L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons:

- 1.) This credential takes away developmentally appropriate practices and will lead to long term delays in young children.
- 2.) This would also greatly impact people of color who own and appropriate their own centers as well as the low-income families they serve
- 3.) It lacks the transparency that is required for government agency to follow and does not show public comments only the one it favors

Please accept this letter and make the necessary reforms so that this credential helps our families, children and early education workers, instead of harming us.

**Mayra Gutierrez**

Comment:

My name is Mayra Gutierrez, I am an East L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons: Ignoring the contributions of Higher Education Faculty who have a strong foundation and expertise in Early Learning. Creating a developmentally inappropriate credential that does not serve our children 0 - 8. Creating inequitable barriers for students to achieve their educational goals. Lack of accountability in qualifying developmentally inappropriate TPE alignment and assessment. Stigmatizing Community Colleges as having inferior programs.

Please accept this letter and make the necessary reforms so that this credential helps our families, children and early education workers, instead of harming us.

**Biruk Helessabo**

Comment:

My name is Biruk Helessabo, I am a West LA collage, child development student. I am writing this letter to express my opinion on the way the current TK-3<sup>rd</sup> grade credential is written for the following reasons.

1, I wonder how come it is only having bachelor's degree able to treat early age Childs. I disagree with this statement\*\*\* required bachelor's degree\*\*, an individual who has diploma in early childhood education has better skill for children than the one who use in a subject bachelor's degree. Example let's say if someone has bachelor's degree in management and others have diploma or certificate in early child education. Which one is for pk to 3 grade age children will understand or treat well? The matter is who has equivalent knowledge or skill for those age children.

2, I strongly opposed this rush propose pk to 3 grade early childhood specialist credential. Because I have young children in kindergarten and preschool. They are participating in a Head start program. The this propose is going to affect their program and dismiss head Strat early childhood education program. I really appreciate those who are helping my children for cognitive development and social and emotional and school readiness program. I just want to save Head stats for our children. They have perfect skills to trat young children.

3, Early childhood educators who must be qualified in early education qualification not the one who have bachelor's degree in math's or physics. It looks like high school math's teacher qualified to learn early childhood education?

**Maria Juarez**

Comment:

My name is Maria Juarez, I am an East L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons: (insert here 3-4 of some of the reasons that most affect you as a worker/student/mother/grandmother...)

1. Creating inequitable barriers for students to achieve their educational goals.
2. Promotion and enhancement of Systemic Racist Barriers to our current BIPOC(Black, Indigenous, People of Color) workforce.
3. Marginalizing and trivializing our expertise as Early Learning Professionals/Developmentalists.
4. Creating a developmentally inappropriate credential that does not serve our children 0 - 8

Please accept this letter and make the necessary reforms so that this credential helps our families, children, and early education workers, instead of harming us.

**Kevin Lopez**

Comment:

My name is Kevin Lopez, I am a West L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons:

1. Lack of accountability in qualifying developmentally inappropriate TPE alignment and assessment.
2. The lack of transparency that is required for a government agency to follow
3. Marginalizing and trivializing our expertise as Early Learning Professionals/Developmentalists
4. Creating a developmentally inappropriate credential that does not serve our children 0 - 8

Please accept this letter and make the necessary reforms so that this credential helps our families, children and early education workers, instead of harming us.

**Ana Mejia**

Comment:

My name is Ana Mejia, I am a West L.A. College, Child Development student. I am writing to letter to express my opposition to the way the cuerret TK-3rd grade credential is written for the following reasons:

1. As a latin early educational worker I believe that it is important for the child to practice the parent/s language if it's spanish because that is in our culture. It is important for our children to learn our language at home and school when it's offered by a latin teacher/s.
2. As a parent I find it unfair that the credential isn't willing to practice languages with our children. I find it to be disrespectful because they are trying to dismiss our cultures from our



children. There should be Spanish or different language classes for our children to learn.

3. As a grandmother I would love for my grandkids to learn and be able to speak their language wherever they go. I would love for them to learn at school more and more and be exposed to other cultures. Have a day or a week for culture day.

Please accept this letter and make the necessary reforms so that this credential helps our families, children and early education workers, instead of harming us.

**Sondra Moe**

Comment:

I am an expert in Child Development and Early Childhood Education with 50 years of experience facilitating and supporting children's learning and development from birth to 3<sup>rd</sup> grade. I began as a business owner of a Family Child Care program. I have also been an aide, teacher and a director of both Community College and University laboratory schools and have been faculty at Institutions of Higher Learning for over 30 years at both the Community College and University levels.

Along with many of my colleagues as a leader in the professional organizations California Community College Early Childhood Educators (CCECE) and a Community College and University cross sector Higher Education Collaborative (PEACH), I have been following and unsuccessfully attempting to share and support the use of my expertise and that of my colleagues with the California Commission on Teacher Credentialing through the process of creating the PK- 3 Early Childhood Specialist Credential and Early Childhood TPEs and TPAs for over ten years. The CTC has generally disregarded the expert feedback and utilized the commission staff who are not experts or IHE faculty in Early Childhood Education to complete these documents. In addition, where the commission has used the terms related to the basic concepts of the ECE field, terms like family engagement, developmentally appropriate practices and play, their placement in the documents and depiction reflect the lack of expertise of the Commission staff.

In their current format the PK-3 Early Childhood Specialist Credential and Early Childhood TPEs and TPAs will undermine the future of California by undermining the learning and development of its young children. California's national standing for reading and math doesn't have to go much lower before it reaches the bottom of 50 nationwide. Child Development and Early Childhood Education expert recommendations must be utilized and respected to improve this work before it is finally approved and implemented.

**Jessica Ramirez**

Comment:

My name is Jessica Ramirez, I am a West L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons:

1.It is a developmentally inappropriate formatted credential that does not serve students/will not meet the needs of children aged 0-8.

2. The lack of transparency about the input of the community on this matter; comments are not being shown and/or only favorable comments are being made available to the public.
3. The lack of accountability in qualifying developmentally inappropriate TPE alignment and assessment.
4. Ignoring the contributions of Higher Education Faculty who have a strong foundation and expertise in Early Learning.

Please accept this letter and make the necessary reforms so that this credential helps our families, children and early education workers, instead of harming us.

**Iratze Rodriguez**

Comment:

My name is Iratze Rodriguez, I am an East L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons:

1. Creating a developmentally inappropriate credential that does not serve our children 0 - 8 as educators should be able to accommodate every child learning developmental stages. In some ways, it sabotages young children's development since they are practically being forced to learn something they may not understand.
2. Stigmatizing Community Colleges as having inferior programs. Community Colleges provided a cheaper way to help students achieve their goals, without falling in dept.
3. Sabotaging collectivism within student pathways
4. Creating inequitable barriers for students to achieve their educational goals. Everyone should be able to have full access to education, it should not be made difficult for students to have access to education.

Please accept this letter and make the necessary changes so that this credential helps our families, children, and early education workers, instead of harming us.

**Hayba Ben Said**

Comment:

My name is Hayba Ben Said, I am a West L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons:

1. Not turning on public comment at webinars that are designated for feedback.
2. Not using public comment to inform their decision-making process.
3. Creating a developmentally inappropriate credential that does not serve our children 0 - 8.
4. Creating inequitable barriers for students to achieve their educational goals.

Please accept this letter and make the necessary reforms so that this credential helps our families, children and early education workers, instead of harming us.

**Nina Solomona**

Comment:

My name is Nina Solomona and I am a West L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons:

1. This Credential does not contain practices that are developmentally appropriate for children 0-8 of age, according to the review of organizations such as Partnerships for Education, Articulation and Coordination through higher Education, as well as LACCD ECE District Discipline Committee which consists of representatives of ECE programs in our nine campus colleges.
2. This Credential will negatively affect privately owned programs that have already been affected by the current public TK and ETK programs, disproportionately effecting women of color who provide quality home-based child care programs and businesses to our children and families.
3. This Credential limits the range and depth of quality care that our children of diverse backgrounds, abilities, cultural experiences, as well as social, emotional, and linguistic developmental, and other special needs deserve to receive from their teachers and caregivers.
4. This Credential unfortunately allows for a lack of transparency that is often required for a government agency to follow, but but a disservice to families receiving services and professionals working in the field.

Please accept this letter and make the necessary reforms so that this credential helps our families, children and early education workers, instead of harming us.

**Cindy Stephens**

Comment:

Dear Mary Sandy and Members of the Commission,

I come to you as an early learning specialist with 45 years of experience working in the field of Early Care and Education. I began my career directly working with children and families and I currently serve as a Higher Ed Faculty directly facilitating learning opportunities to those who desire to be early learning professionals with a holistic approach that supports them in creating environments that support all children and their families.

I have many concerns about the PK – 3 ECE Specialist Credential that is in the process of being authorized, which is why I am submitting this public comment. I have had many opportunities to speak about my concerns and have experienced those concerns being minimized and dismissed. As a public servant myself, the process of elevating all of the voices that this credential will impact is an important aspect of creating a credential that will truly serve children and families with the best outcomes in their learning journeys.

While I support a PK – 3 ECE Specialist Credential, I cannot support this particular credential as there are grave concerns in regards to the educational process that is being authorized due to the dismissal of the voices in the Early Learning Developmentalist Community that have been silenced, marginalized, and misused.

While there are several concerns, I will highlight the ones that I feel are most important as well as provide a solution for the Commission to consider.

These are my concerns:

- **Belittling language** – “The proposed PK - 3 ECE Specialist Credential has been intentionally designed to recognize and provide pathways for those who hold a bachelor’s degree and have already gained experience and expertise in early childhood education through their work in programs with California’s mixed delivery early childhood education system (e.g., California State Preschool Programs, Head Start, private preschools and others), to have an expedited pathway to earning the credential and beginning to teach in the PK-3 environment.”

Not only does this statement label the preferred and most understood environments of the writers (CSPP, Head Start, private preschools), the lack of understanding that the overwhelming majority of children are in community based private programs, religious based programs, family child care homes, and kinship care. The second and most demeaning statement in the paragraph, and a direct link to the attitude with which the CTC has carried out the creation of the proposed PK-3 ECE Specialist Credential is found in the last seven words: “...beginning to teach in the PK-3environment.”

This underlying disdain, misunderstanding, and hierarchical thinking is clearly displayed. The intention and understanding in this line is that all of those other environments are not teaching, they are something else, less than.

- **Misleading and Unrealistic Expectations**- The Notice of Intent goes on to say that “The PK – 3 ECE Specialist Credential would also provide accelerated pathways for current Multiple Subject Credential holders as well as Child Development Teacher Permit (CDP) holders with a bachelors degree to earn the credential and begin serving as quickly as possible in UPK/UTK settings.”

The state requirement is 24 ECE units for multi-subject credentialed teachers. This is one year of full-time coursework. Since it can be assumed these teachers will be working full time, it is an unrealistic expectation to take more than one or two classes per semester. I am currently involved in a TK Cohort that our college established with a local school district. We developed an accelerated pathway to support the district and the teachers who wanted to teach in a TK classroom. I have taught 2 of the courses that they are taking. The feedback that we are getting is that they are overwhelmed, not supported by their district administration to implement what they are learning in our courses, and they do not have the adequate time to truly reflect on what they are learning to create an environment that supports their early learners. In addition, the feedback that we have received is that the administration is more concerned about meeting the 24-unit

requirement and less concerned with adjusting the curriculum to support the holistic development of the 4-year-old in that setting.

What is more troubling about the proposal here is the portion that states “...Child Development Teacher Permit (CDP) holders with a bachelor’s degree to earn the credential...” Certainly, there needs to be an accessible pathway for these teachers as well. However, if the intention is that these teachers go through a credentialing program, that is 18 months to two years of full-time coursework not counting student teaching, it is unrealistic to think of this timeframe as “quick”. Again, these individuals are likely working full time so a credentialing program coursework is likely to take at least twice that amount of time. The idea of “quickly” is again thwarted with this proposed pathway.

Using quick as an incentive, is a disservice to our field. There is nothing quick about creating high-quality teachers who are well equipped to meet the needs of the diverse population of children served in California’s educational system. While the language of the proposed credential speaks about equity, diversity, anti-racism, and inclusion, the use of these terms is more performative and not what needs to occur to be transformative. We have lived through 3 years of trauma due to the COVID 19 pandemic and have learned a lot about our educational system. We have the opportunity to do something to change outcomes for children and families. Quick is never a solution in accomplishing meaningful change.

- **Cost to institutions without money tied to funding** – Within this proposal, there are expectations for IHE faculty to (at a minimum) recreate courses, programs, reassign responsibilities, hire, train, and purchase equipment, without any mention of funding to pay for all of these requirements (and likely more) all of which are outside of the current responsibilities and budgets. Legal requirements without funding to support those requirements is unacceptable. In addition, there is no evidence of understanding about the college curriculum approval process.

At most colleges and universities, it is a minimum of 18 months from the time that program creations/changes are submitted to the time they are approved to be offered. A minimum of 6 months prior is needed to fully understand the needed changes, to analyze current courses and programs, to determine what other degree patterns will be impacted by changes, and multiple consultation with college articulation officers and curriculum committee technical support faculty are all required before actually beginning the process of writing the changes. During this time, presentation/submission of proposed changes must also be approved by each college’s CD/ECE/EDU department’s advisory boards and submitted to the regional consortium for approval of new programs. These minutes must be submitted as a part of the justification for changes to/creation of coursework and certificate and degree patterns. There is also work of ensuring that CCs and CSUs/UCs or other local 4-year colleges are working together for a streamlined approach for student transfer and success. The state Chancellor’s Office has not created a TMC for the PK-3 ECE Specialist Credential which

means that there is no guidance or assurance that any degree pattern created at a CC will be accepted at a 4-year college. Most teachers in California began their coursework at community colleges with 65% of CSU graduates entering the University as transfer students and 55% of CSU credential students beginning their college careers at a CA Community College. All of this work, and certainly more, is the minimum that is required to implement the changes proposed in the handbook, all without funding to implement, solidified guidance, or a reasonable timeline for rollout.

While there are many more concerns, the above should be enough for us to take a deeper look at this credential and to develop, together, a credential that will uplift our teaching field in ways that we are able to create a workforce that is truly respected for the work that they do in promoting a high-quality education system that spans from 0 – 18 and beyond. We know that when children are engaged in their learning and we have established meaningful partnerships with their families, that the outcomes for their future success are insurmountable. We want a system that supports all of our children.

I would like to share with you a few quotes from [A Top Researcher Says it's Time to Rethink our Entire Approach to Preschool](#) by Anya Krementz.

- "It really has required a lot of soul-searching, a lot of reading of the literature to try to think of what were plausible reasons that might account for this." And by "this," she means the outcome of a study that lasted more than a decade. It included 2,990 low-income children in Tennessee who applied to free, public prekindergarten programs. Some were admitted by lottery, and the others were rejected, creating the closest thing you can get in the real world to a randomized, controlled trial — the gold standard in showing causality in science.
- Farran and her co-authors at Vanderbilt University followed both groups of children all the way through sixth grade. At the end of their first year, the kids who went to pre-K scored higher on school readiness — as expected. But after third grade, [they were doing worse than the control group](#). And at the end of sixth grade, they were doing even *worse*. They had lower test scores, were more likely to be in special education, and were more likely to get into trouble in school, including serious trouble like suspension
- "One of the biases that I hadn't examined in myself is the idea that [poor children need a different sort of preparation](#) from children of higher-income families." She's talking about drilling kids on basic skills. Worksheets for tracing letters and numbers. A teacher giving 10-minute lectures to a whole class of 25 kids who are expected to sit on their hands and listen, only five of whom may be paying any attention. "Higher-income families are not choosing this kind of preparation," she explains. "And why would we assume that we need to train children of lower-income families earlier? Farran points out that families of means tend to choose [play-based](#) preschool programs

with art, movement, music and nature. Children are asked open-ended questions, and they are listened to.

Lastly, I would like to leave you with our charge as early learning professionals from the National Association for the Education of Young Children Code of Ethical Conduct:

Standards of ethical behavior in early childhood care and education are based on commitment to the following core values that are deeply rooted in the history of the field of early childhood care and education.

- We have made a commitment to
  - Appreciate childhood as a unique and valuable stage of the human life cycle
  - Base our work on knowledge of how children develop and learn
  - Appreciate and support the bond between the child and family
  - Recognize that children are best understood and supported in the context of family, culture, community and society.
  - Respect the dignity, worth, and uniqueness of each individual (child, family member, and colleague)
  - Respect diversity in children, families, and colleagues
  - Recognize that children and adults achieve their full potential in the context of relationships that are based on trust and respect

And lastly:

P-1.1—Above all, we shall not harm children. We shall not participate in practices that are emotionally damaging, physically harmful, disrespectful, degrading, dangerous, exploitative, or intimidating to children. This principle has precedence over all others in this Code.

This credential will indeed harm children. The solution I propose is to take time to develop this credential so it will truly serve the children of California. To push up what we know as early learning developmentalists instead of pushing down an educational system that is focused more on academic learning and less on the holistic nature of children's growth and development which includes mental and spiritual health. To continue to reimagine an educational system that engages children in their learning through developmentally appropriate approaches to learning and to support the current workforce in creating opportunities to elevate their voices and the hard work that they have been doing for over 50 years.

I am looking forward to being a part of the solution along with many of the early learning developmentalists who have spoken so diligently about their concerns regarding the credential in its current state.

With kind regards,  
Cindy Stephens

**Gabriel Thompson**

Comment:

My name is Gabriel Thompson, I am a West L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons:

1. This certification program does not specifically address the developmental/ learning needs of children ages four to eight, as it does not contain learning objectives and exercises that identify and develop language skills needed to succeed at later levels.
2. The costs associated with attaining and sustaining certification are prohibitive for operators of home-based childcare and learning facilities. The hours needed place an undue economic strain on facilities such as these in low-income neighborhoods and cities.
3. The current system for comment and complaint registration lacks opacity and makes it difficult to respond in a timely manner. Also, all commission meetings should be live-streamed with a method for remote attendees to speak directly with policymakers.
4. Fails to make accommodations for the input of Experts in higher learning institutions - particularly for those of color- to observe, comment on and steer the development and the strategies demanded by these new guidelines. Real time input for those in the know is crucial to the implementation of successful pedagogy no matter the institution of learning level. These new guidelines do not make such accommodations, the peril of those most in need of help.

Please accept this letter and make the necessary reforms so that this credential helps our families, children and early education workers, instead of harming us.

**Sidney Urias**

Comment:

My name is Sidney Urias, I am an East L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons:

1. It affects women of color who have home-based child care programs and businesses.
2. We will lose 4-5 year olds to public school systems.
3. It won't value each child's cognitive, social, emotional, linguistic, and cultural experiences.
4. Students will be behind in their education that they rightfully deserve.

Please accept this letter and make the necessary reforms so that this credential helps our families, children and early education workers, instead of harming us.



**Donald Williams Jr**

Comment:

My name is Donald Williams Jr I am a West L.A. College, Child Development student. I am writing this letter to express my opposition to the way the current TK-3rd grade credential is written for the following reasons:

1. Stigmatizing Community Colleges as having inferior programs
2. Creating a developmentally inappropriate credential that does not serve our children 0 - 8
3. Falsifying public comment by only reporting the favorable comments
4. Not turning on public comment at webinars that are designated for feedback

Please accept this letter and make the necessary reforms so that this credential helps our families, children and early education workers, instead of harming us.

**Nancy Hurlbut**

Comment:

I want to begin by expressing my thanks for another opportunity to provide feedback on the PK-3 ECE Specialist Instruction Credential requirements and CTC's process during 2022 for developing these requirements.

I would like to begin by expressing my concerns about the results of many months of work on this credential. The requirements of this PK-3 ECE credential are more a push down of the multiple subject credential than a reimaged appropriate PK-3 ECE credential. This credential as conceived presents particular concern for children of color, diverse families, and those of low social economic status. Some of the reasons I make these statements are to follow.

1. The PK-3 ECE credential has very weak subject matter requirements. The literature supports that child development is the appropriate subject matter for working with children from birth to grade 3 and, yes, one option for the subject matter is a baccalaureate in child development, early childhood, etc. including models such as 2 community college years followed by 2 upper division years at a 4-year university or 4 years at a baccalaureate institution. I applaud this requirement which is appropriate preparation for teachers of young children (birth – 8 years).

However, there is a second option for the PK-3 credential that diminishes child development as the subject matter and, in fact, there are ways using this option that someone with only 3 units of child development can receive the PK-3 ECE credential. This option has no assessment of the candidate's knowledge in the subject matter. Other credentials such as the multiple subject credential, require liberal studies or liberal arts baccalaureate and offer no other direct pathway. Instead, the multiple subject credential requires alternative assessment opportunities instead of weak alternative pathways.

My strong recommendation, is to remove alternative 2 and provide alternative assessment options like those offered in other credentials, such as a CSET.

The 24 Child Development/ECE option could become a short-term emergency option if needed as the PK-3 ECE Credential gets started. An emergency for only 2 years is reasonable. By making these changes, the PK-3 ECE Credential would be on par with other credentials and not be a second-class credential. Requiring a baccalaureate in child development/ECE as the only direct pathway to the PK-3 ECE Credential would provide appropriate preparation for our young children.

2. The PK-3 ECE credential is not a reimaged credential but a push down of the multiple subject credential. TPEs 1-5 for the PK-3 credential were written as a modification of the multiple subject credential and do not represent research in the field of early childhood education or ECE national standards. Many Early Childhood professionals on various PK-3 ECE workgroups expressed extreme frustration at the way the workgroups were designed and how the result of the workgroup process did not relate to what they had recommended. Instead, the requirements were written by a small group of CTC staff that did not appear to be trained/experience teaching in ECE or experience at creating ECE curriculum in higher education or dealing with the institutional approval process or obstacles. This credential perpetuates structural and systemic racism and continues to devalue and diminish our BIPOC community members who are traditionally marginalized.
3. Requiring higher education to start preparing PK-3 ECE credential candidates with the new PK-3 ECE TPEs and not offering a TPA that would measure these PK-3 ECE TPEs creates chaos in designing programs. We have been told to use the multiple subject TPA to measure the PK-3 ECE TPEs. That either means that the PK-3 ECE TPEs are so similar to the multiple subject TPEs, or the expectation is that the candidates will be educated in the multiple subject TPEs. This creates such confusion for the students and our preparation programs.
4. Misinformation provided to CTC is a concern. After the forums on the PK-3 Credential, CTC staff only presented selected messages from the forums. For instance, when the forum participants were asked, "What are you excited about this credential?" The most answered response was "nothing" in the three forums I attended. However, the staff only reported words like "professionalizing the field." They selectively left out the negative comments and when we asked them why they did not present the negative results at the commission meeting, the staff said, "We wanted to put a good spin on the work." That is not how data is presented in the professional world and may have biased the commissioner's decision to approve the requirements.
5. Since the requirements were passed by CTC, it has become apparent that some CTC commissioners and staff did not know what they passed. This is a big concern. Why pass requirements for a new credential if one does not know what they are. For instance, at a recent CCCECE meeting, the faculty questioned the CTC staff on why the community college practicums did not count for the PK-3 ECE credential preparation. The response was

something like, “I thought it did.” “It was supposed to.” “Let us look into this.”

6. We now hear that undergraduate practicums will be able to count towards the PK-3 credential preparation (recommended to count but not approved yet). We hope that gets passed. We are concerned about what that means. Will undergraduate practicums at all higher education systems count- those at the CSU, CCC, UCs, and privates. If undergraduate practicums count at any system, they should count in all four California systems. I argue this as it so often feels that this credential subject matter is considered to only need to be met at the Community College level. However, it is important to know that over 2500 students graduate annually in Child Development/Early Childhood at the CSU. We argue that these students need their practicums to count also. We are also concerned about what requirements will a practicum need to meet to count?
7. A promise made on many meetings has been that families have multiple options for their four-year olds. Some may attend TK while others may select to attend their present childcare centers/family day homes. In reality, this is not really an option. Multiple choices are only for families with resources and some school districts are putting pressure on families to send their child to TK. This has set up inequitable opportunities for children and families in California.
8. To end, it is important for California Commissioners to realize that California is behind many states in the development of an early childhood teaching credentials. Thirty years ago, I worked in Oklahoma as coordinator of my university’s state’s PK-3 credential permitting teachers to teach in the public schools up to third grade. Also, NAEYC has been the professional organization for early childhood since 1926 and many of us have been following NAEYC standards for years. California ECE programs with enough financial resources are already accredited by NAEYC. When the CTC commission approved the requirements for the PK-3 ECE credential, one of the commissioners stated that “We have finally professionalized Early Childhood Education.” I wonder if that did not express what is an underlying bias against many of us ECE professionals and helps explain the frustration felt that our input “early childhood expert” advise about the PK-3 ECE credential requirements appeared to be ignored.

**Caroline Jen**

Comment:

Please consider honoring the Clinical Hours that students at the community college level have earned in their Practicum classes, for the following reasons:

These Practicum courses offer rigorous practical opportunities that include teaching academic content to children, between infancy through third grade, using a developmentally appropriate approach.

The Practicum courses include fieldwork in the classroom, directly working with children.

The Practicum hours are supervised by a qualified mentor and a qualified college instructor.

The Practicum student's mentor is specialized in the age group (between infancy to 3<sup>rd</sup> grade) for which the student is completing their Practicum hours. Students are asked to observe children, assess their developmental levels to plan, and implement curriculum accordingly. Students are evaluated on a consistent basis by their mentor and support staff at their Practicum site, as well as by their Practicum instructor, for a minimum of one to two times during the semester. The Practicum instructor's evaluation of the student is formal and reflects a set of teaching skills and competencies gathered from professional organizations, such as NAEYC and your agency, the CTC.

Honoring the Practicum hours would create a career path that is inclusive and equitable for those beginning their academic journey at the community college level.

Honoring the Practicum hours would validate the student's fieldwork of 108 hours, and 216 hours if they complete two semesters of practicum courses (Practicum in Child Development I and II).

**Kim Barker**

Comment:

I am writing regarding my concern regarding the proposed PK-3 Credential. With nearly 30 years of experience in Child and Family Education field I would be remiss not to share my absolute dissatisfaction in what I perceive to be gaps, inequities, developmentally inappropriate infrastructures, professional undermining, unprofessional, nontransparent, marginalizing, non-representative, mis-represented and unprofessional processes implemented during the California Commission on Teacher Credentialing required stages and actions in pursuit of passing the PK-3 Credential. The following are just a few of the issues I believe must be addressed with changes and solutions, authentically advised by the Early Learning professionals and developmentalists. It is my professional opinion that the PK-3 Credential has extreme deficits of inadequacy. It has the potential of bringing great harm to our children, families, communities and the Early Learning profession as a whole.

Marginalizing and trivializing our expertise as Early Learning Professionals/Developmentalists

Creating a developmentally inappropriate credential that does not serve our children 0 - 8

Ignoring the contributions of Higher Education Faculty who have a strong foundation and expertise in Early Learning

The lack of transparency that is required for a government agency to follow.

Not turning on public comments at webinars that are designated for feedback.

Once they close public comments, they are required to leave them up, so the public continues to have access to what was submitted

Not using public comment to inform their decision-making process.

Falsifying public comment by only reporting the favorable comments

Creating inequitable barriers for students to achieve their educational goals.

Promotion and enhancement of Systemic Racist Barriers to our current BIPOC (Black, Indigenous, People of Color) workforce.

Lack of accountability in qualifying developmentally inappropriate TPE alignment and assessment.

Stigmatizing Community Colleges as having inferior programs.

Sabotaging collectivism within student pathways

Additionally, here are some of the concerns we as a field have, as well as some solutions.

Thank you.

Kim Barker

Child and Family Professor

Information and background:

Over the last several years, the state of California has become increasingly aware that there is a siloed approach to care and education of children. This has been especially true of children birth through third grade. Inequities in environments, teacher preparation, and social perception of what high quality early care and education involve have only been exacerbated by the Covid-19 pandemic. During this time, the nation understood understands more than ever the importance of reliable, talented, committed teachers who understand understand the whole child (including their families). Prior to and during the pandemic, workgroups met to revise the current Child Development Permit (a CTC issued credential) but it has never been finalized/completed. During the pandemic, pilot programs were begun which have not been finalized/complete. See wording from the CTC website below regarding these pilots:

Four distinct pilot opportunities are available under the auspices of the PDG-R grant for interested two-and four-year institution of higher education that offer preparation for the ECE workforce. The pilots will be operational during the PDG-R grant funded period of July 1, 2020-December 31, 2022. For those institutions interested in applying to be a part of the Pilots, applications are available (Application to participate in the ECE Pilots). The four pilots are:

1. TPEs implementation pilot

2. Program Guidelines (accreditation) pilot
3. ECE formative Teaching Performance Assessment pilot
4. Program Quality Peer Review

<https://www.ctc.ca.gov/educator-prep/early-care>

In an effort to encompass the different aspects of teacher preparation, breaking down of silos, and creating a reasonable, well-functioning system for children and teachers from age three through grade three, the current proposal for the PK-3 Early Childhood Specialist Credential has emerged.

Many individuals and state organizations have, at first, seen this move as one that will unify the field of early care and education birth through age eight. This unification and understanding of the developmental needs of young children is essential to the lifelong success of children in both academic and life outcomes. Many saw this as a wonderful opportunity to help ensure the success of our children and our communities. However, this is not the reality of the currently proposed credential, for the expectations of institutes of higher education (IHEs) in implementing the proposed credential, for the teacher preparation students that will be forced to abide by this proposal, or for the children and communities in which this proposal will have a long-term impact.

Notice of Intent

February 2023 California Regulatory Notice Registers | OAL

TITLE 5. COMMISSION ON TEACHER CREDENTIALING

PK-3 Early Childhood Education Specialist Credential – Notice File Number Z2023-0130-04

This document asserts the intentions of CTC in regards to the proposed PK-3 Early Childhood Specialist Credential. Within this short document, several errors, miscalculations, and misunderstandings have been perpetrated.

Belittling language

“The proposed PK-3 ECE Specialist Credential has also been intentionally designed to recognize and provide pathways for those who hold a bachelor’s degree and have already gained experience and expertise in early childhood education through their work in programs with California’s mixed delivery early childhood education system (e.g., California State Preschool Programs, Head Start, private preschools, and others), to have an expedited pathway to earning the credential and beginning to teach in the PK-3 environment.”

Not only does this statement label the preferred and most understood environments of the writers (California State Preschool Programs, Head Start, private preschools), the lack of

understanding that the overwhelming majority of children prior to Kindergarten are not in State Preschool Programs or Head Start Programs. The majority of children are in community based private programs, religious based programs, family childcare homes, and kinship care. The second and most demeaning statement in this paragraph, and a direct link to the attitude with which the CTC has carried out the creation of the proposed PK-3 ECE Specialist Credential is found in the last seven word: "...beginning to teach in the PK-3 environment."

This underlying attitude of disdain, misunderstanding, and hierarchical thinking is clearly displayed. The intention and understanding in this line is that all of those other environments are not teaching, they are something else, something less than.

#### Misleading and Unrealistic Expectations

The Notice of Intent goes on to say that "The PK-3 ECE Specialist Credential would also provide accelerated pathways for current Multiple Subject Credential holders as well as Child Development Teacher Permit (CDP) holders with a bachelor's degree to earn the credential and begin serving as quickly as possible in UPK/UTK setting."

The state requirement is 24 ECE units for multi-subject credentialed teachers. This is one year of full-time coursework. Since it can be assumed these teachers will be working full time, it is an unrealistic expectation to take more than one or two classes per semester. At two classes per semester, the average time to complete just the coursework would be two years. The requirement of 24 units is an essential minimum needed, there is no dispute with this. However, the idea of "quickly" is not realistic even with this set of individuals.

Many school districts have found loopholes in which teachers are using previous learning (within their multisubject credential programming) to count for learning that would be "applicable" to early childhood and are only being required to take just 6 units of early childhood coursework. The coursework that has taken place in the past was not designed to address the needs of children birth to five years old and so the teachers are allowed to use that coursework that is not relevant to their new population of children. In addition, by not directing MS teachers in which courses would provide them the most relevant information, teachers can take any course within ECE. This does not properly prepare the teacher for developing the critical skills needed to educate in a developmentally appropriate manner for a child younger than 5.

What is more troubling about the proposal here is the portion that states "...Child Development Teacher Permit (DP) holders with a bachelor's degree to earn the credential...". Certainly, there needs to be an accessible pathway for these teachers as well. However, if the intention is that these teachers go through a credentialing program, that is 18 months to two years of full-time coursework not counting student teaching, it is unrealistic to think of this timeframe as "quick". Again, these individuals are likely working full time so a credentialing program coursework is likely to take at least twice that amount of time. The idea of "quickly" is again thwarted with this proposed pathway.

This in addition to the requirement that the "... PK-3 ECE Specialist Instruction intern certificate will be valid for a period of two years."

An alternative pathway is needed to ensure that all teachers have sufficient coursework and experience, this is a must. However, timelines for reasonable roll out capacity must be addressed.

High Quality and Cost to a Private Person

"The Commission anticipates that the proposed amendments will develop, maintain, and promote high quality authentic, consistent educator assessments and examinations that support development and credentialing of educators who have demonstrated the capacity to be effective practitioners. In addition, that the regulations will drive program quality and effectiveness for the preparation of the education workforce and are responsive to the needs of California's diverse student population."

Diverse student population—not being taken into consideration with this proposal The state above of ..."consistent educator assessments and examinations" is inconsistent with statements in the proposal handbook seen below.

page 15 under 6A: Administration of the Teaching Performance Assessment (TPA)

The "local scoring option" eliminates the idea of "consistent educator assessments and examinations". If there is to be consistency, then all locales must be held to the same scoring process.

When looking at what constitute high-quality environments for children birth through age 8, there are decades of research and evidence-based practice available to draw from.

The 1979 National Preschool Study in the US that looked at what characteristics were needed for high quality early care and education found that high quality comes from low ratios, low group size, and well-prepared teachers. In addition, more recent research tells us that planned, developmentally appropriate experiences, and low stress environments are also required for high quality classrooms. What else does research tell us? Play-based early care and education programs have better life long outcomes for children and their families. Administration must be supportive and encouraging of DAP play-based approaches to early care and education. The best prepared teachers in the world will not be able to provide the highest quality of education to children if their supervisors are belittling, demeaning, not understanding, and insisting on developmentally inappropriate practices. Quality 101: Identifying the Core Components of a High-Quality Early Childhood Program <https://www.americanprogress.org/article/quality-101-identifying-the-core-components-of-a-high-quality-early-childhood-program/>

In the Notice of Intent, CTC states: "The Commission is not aware of any cost impacts that a representative private person or business would necessarily incur in the reasonable compliance with the proposed action." This statement ignores the costs incurred by individuals as well as Institutions of Higher Education. The Commission also states, "...the proposed legislation may



lead to an increase in the prevention of social inequity.” High quality environments are likely to lead to this desired outcome, however, the CTC is perpetuating a middle/upper middle, white system that places barriers (and potential dangers) to students, children and families. Examples include the dismissal of the years of experience that a current Permit holder has. In fact, the alternate pathway states that these teachers must meet both of the following requirements to qualify for 200 hours of the required clinical practice experience in a preschool or transition kindergarten setting and may be granted equivalence for an additional 200 hours (although the criteria for the additional 200 hours is not specified). “ (A) Either hold a valid Child Development Permit at the Teacher level or higher or verify employment as a lead teacher in a Head Start program or a childcare and development center serving preschool-aged children. And (B) Verify six (6) years or more of satisfactory, full-time teaching experience as a lead teacher in a public or private center-based childcare and development program serving preschool-aged children that is either a license-exempt childcare and development center pursuant to California Health and Safety Code section 1596.792(o) or holds a license as defined in section 101152(l)(1), Article 1, Chapter 11, Division 12, of Title 22.” The commission goes on to describe the qualifications of those who would be supervising interns by stating, “In all intern programs, the participating institution in partnership with the employing districts shall do the following prior to the intern teacher assuming daily teaching responsibilities: ... Identify a mentor for the intern teacher who possesses a valid, corresponding life or clear teaching credential and a minimum of 3 years of successful teaching experience.”

Not only is the mentor required to have half as many years of teaching experience, this teaching experience nor their educational background is required to be with preschool aged or K-3 aged children. If the Commission is focused on helping to create high quality environments, then the qualifications of those mentoring interns must demonstrate the high-quality standards and experience with the targeted population of children so that the mentor may provide insightful, meaningful, and appropriate feedback to the intern that is developmentally appropriate for the age of the children. A crude analogy would be a physician who is a general practitioner being the mentor for the physician who is near fulfilling all requirements to be a brain surgeon. The CTC does not explain how they came about deciding that preschool teachers with a CTC issued Child Development credential (permit) must have six years of experience while the mentor teacher must have a corresponding life or clear credential (non-specific age or specialty) and only 3 years of teaching experience with undefined age of children taught or whether this teaching experience was full-time in their own classroom or as a co-teacher, a substitute, or the like.

This is of particular concern as many experts in the field who have access to credentialed teachers being moved to TK classrooms understand, and have firsthand knowledge of, the inappropriate environments, expectations, and practices happening in district TK classrooms now. The understanding of the needs of young children are not well understood and often the systems in which these teachers find themselves are not supportive of developmentally appropriate environments for the children or their families.

The costs to Institutions of Higher Education and to faculty are not considered within the context of this proposal. For the institutions, there is a direct impact on required coursework

and practicum hours that will count toward the final required number of hours. “Professional preparation, including student teaching, shall be made available in the upper division course offerings at all California public institution of higher education.” This statement discounts the importance of having practicum experiences which include student teaching at the lower division level and it forces these costs and experiences solely on 4-year institutions. By dismissing the need and the requirement for lower division practicum hours, this puts programs in jeopardy by reducing the number of course and degree completers. This further puts the college at risk since the state funding formula is based largely on the completion of coursework, certificates, and degrees. These impacts will reflect directly on the faculty and staff in these institutions. Requiring these hours solely at the upper division level also puts an unnecessary financial burden on students. California Community Colleges cost \$46 per semester unit while CSUs cost \$396 per semester unit. The 600 hours required in this pathway could reasonable be split between lower division, upper division, and credential level requirements and save students thousands of dollars while ensuring “...a developmental and sequential set of activities integrated with theoretical and pedagogical coursework...” California’s Quality Counts Quality Rating and Improvement system has (in a variety of iterations) provided a nationally accepted framework for quality settings in early childhood. It is understood that the decades of work and research for this evidence-based approach is not being incorporated into the proposed PK-3 ECE Specialist Credential when look at assessment and examinations or even in mentor and site selection. Below are excerpts from the PK-3 ECE Specialist Credential Handbook.

Cost to institutions without money tied to funding Within this proposal, there are expectations for IHE faculty to (at minimum) recreate courses, programs, reassign responsibilities, hire, train, and purchase equipment, without any mention of funding to pay for all of these requirements (and likely more) all of which are outside of current responsibilities and budgets. Legal requirements without funding to support those requirements is unacceptable. In addition, there is no evidence of understanding about the college curriculum approval process.

At most colleges and universities, it is a minimum of 18 months from the time that program creations/changes are submitted to the time they are approved to be offered. A minimum of 6 months prior is needed to fully understand the needed changes, to analyze current courses and programs, to determine what other degree patterns will be impacted by changes, and multiple consultations with college articulation officers and curriculum committee technical support individuals are all required before actually beginning the process of writing the changes. During this time, presentation/submission of proposed changes must also be approved by each college’s CD/ECE/EDU department’s advisory boards and submitted to the regional consortium for approval of new programs. These minutes must be submitted as part of the justification for changes to/creation of coursework and certificate and degree patterns. There is also the work of ensuring that CCs and CSUs/UCs or other local 4-year colleges are working together for a streamlined approach for student transfer and success. The state Chancellor’s Office has not created a transfer model curriculum (TMC) for the PK-3 ECE Specialist Credential which means that there is no guidance or assurance that any degree pattern created at a CC will be accepted at a 4-year college. Most teachers in California begin their coursework at community colleges with 65% of CSU graduates entering the University as transfer students and 55% of CSU

credential students beginning their college careers at a CA Community College. All of this work, and certainly more, is the minimum that is required to implement the changes proposed in the handbook, all without funding to implement, solidified guidance, or reasonable timeline for rollout.

We need to insert the data regarding the diversity of our workforce as well. Meeting Transparency and Meaningful Feedback

On the CTC website <https://www.ctc.ca.gov/educator-prep/pk-3-ece-specialist-instruction-credential> the following information is found regarding meetings and discussions that have taken place publicly.

Note that meetings for the community that are required to allow for discussion, collaboration, and public input are not held until after meetings where agenda items included the Adoption of Authorization and Credential Requirements and the Adoption of Program Preconditions, Program Standards, and Teaching Performance Expectations (TPEs). If the public was not able to meet, discuss, and provide input until after the adoption then it is clear that the CTC has neglected its duty according the Administrative Procedure Act (APA) to “Provide the public with a meaningful opportunity to participate in the adoption of regulations or rules.” It is also unclear whether CTC is proposing a change to a current rule versus creating a new rule.

Power Point Presentations

[☞ ACCCTEP meeting, November 2022](#)

[☞ CCAC meeting, November 2022](#)[Open PDF in current window.](#)

[☞ CTE meeting, November 2022](#)

[☞ PK-3 ECE Specialist Instruction Credential Introduction Webinar November 16, 2022](#)[Open PDF in current window.](#)

[☞ PK-3 ECE Specialist Instruction Credential Q and A Webinar December 2, 2022](#)[Open PDF in current window.](#)

[☞ PK-3 Technical Assistance Webinar Slide Deck](#)

Agenda Items

[☞ August 2022](#)[Open PDF in current window.](#) - Adoption of Authorization and Credential Requirements

[☞ October 2022](#)[Open PDF in current window.](#) - Adoption of Program Preconditions, Program Standards, and Teaching Performance Expectations (TPEs)

Recorded Meetings and Webinars

[PK-3 ECE Specialist Instruction Credential Introduction, November 16, 2022](#)

[PK-3 ECE Specialist Instruction Credential Q and A, December 2, 2022](#)

[Unpacking PK-3 Credential Math Program Standard Webinar, February 2, 2023](#)

[Unpacking the PK-3 Credential Equity, Inclusion, & Diversity Program Standard Webinar, February 2, 2023](#)

[Initial Program Review: PK-3 Specialist Instruction Programs, February 3, 2023](#)

PK-3 ECE Specialist Instruction Credential Webinar: Literacy Standard and TPE 2/19/2023

The following resources are available from the PK3 ECE Specialist Instruction Credential Webinar

[Video Recording of Webinar](#)

[SB 488 Key Points](#)

[PK-3 ECE Specialist Instruction Credential Handbook – Excerpt Related to the Literacy Program Standards and TPE](#)

[Literacy Standards and TPEs for PK-3 Credential - Annotated Bibliography and Selected Websites](#)

[Side by Side Comparison of MS/SS and PK-3 Literacy Teaching Performance Expectations](#)

[Side-by-Side Comparison of Multiple Subject/Single Subject and PK-3 Early Childhood Education](#)

[Literacy Standards Open PDF in current window.](#)

[Resource Guide on Preparing Teachers for Effective Literacy Instruction Open PDF in current window.](#)

[PK-3 ECE Specialist Instruction Handbook Open PDF in current window.](#)

PK-3 Credential Math Program Standard Webinar 02/02/23

The following resources are available from the PK-3 Credential Math Program Standard Webinar.

[Video Recording of Webinar](#)

[Webinar Slides](#)

☐ CA Key Resources Aligned - TK-3 Extended Version

☐ CA Key Resources Aligned - TK-3 Short Version

☐ PK-3 Standard 8 and TPE Mapping

☐ Preschool and K-3 Standards-Frameworks

☐ Preliminary PK-3 ECE Specialist Instruction Credential Standard 8 (Mathematics) Evidence Guide

## Collaboration

Because of the lack of transparency in this process and the lack of input by the public and experts in the field, there has been a lack of collaboration to unify the field of early care and education and does not meet the CTC statement of creating environments that provide, “Developmentally appropriate practice (that) foster young children’s joyful learning and help maximize the opportunities for all children to achieve their full potential.” Nor does it validate the CTC statement that, “This credential recognizes and values the rich background and extensive experience of candidates...to support candidates’ transition from the Child Development Permit system to earning the PK-3 ECE Specialist Instruction Credential...”

It is understood that each system has its own set of governing rules and policies and that each system is best situated to bring their expertise to the table in collaboration with other interconnected systems, especially when proposing a large shift over multiple systems as the PK-3 ECE Specialist Credential does.

However, the process has not sufficiently included the system and field expertise of California Community College full time faculty, California State University full time faculty, University of California full time faculty, other 4-year college full time faculty, local Offices of Education, families, or teachers from all early childhood (age three to grade three) programs.

The experts in early care and education are most likely to be found in IHEs and their voices and expertise have been largely ignored. They have intimate knowledge of the students that are being prepared to become teachers, the systems in which curriculum and degree patterns are created, developmental knowledge of children birth through age eight, and classroom teaching experience for children birth to age eight. At international conferences (Learning and the Brain for example), in national studies, and in national initiatives, the unequivocal message is that ECE has always had it right...developmental knowledge and practice, meeting the needs of the whole child, focusing on social emotional development during the earliest years, providing guided, meaningful free choice experiences for young children throughout most of the day, encourage large motor physical movement, family engagement and respect...the list could go on. The process used by the CTC so far in this proposal has both given lip service to these important foundations and completely ignored the experts in the field who are already doing the preparation of future California teachers.

This lack of collaboration with IHEs is not only a breach of professional respect, but it will also undoubtedly try to force inappropriate expectations on students and children that follow a model, that is not without its flaws, in the current K-12 system. An example of one area of difference is in the video recording of children and who has access to those videos short-term and long-term. Families of young children are rightly more concerned with the video recording of their children and have many privacy concerns. In addition, there are legal ramifications for any program outside of the school district and the IHEs. It is not possible, or wise, to place all students within school district classrooms. The capacity is not there. The breadth of experience and knowledge gained by being in different environments helps students to excel and the use of community programs (where most children attend) as placements is essential to this breadth of experience.

In addition to the lack of collaboration with IHEs, there are huge disconnects between other existing and interconnected agencies. CDTC (CAP alignment), CTCs TPEs, and the CCC Chancellor's Office are three that are apparent. Within the TPEs there is no guidance or delineation of expectation for students to master each of the three levels. In addition, the TPEs do not address specific stages of development for the student and what they do (or should) be doing/have access to at each stage. CTC has stated that their distinction in the different levels comes down to the verb choices rather than looking at the teacher developmental progression. This again shows the lack of understanding in teacher preparation. Two examples would be working with families and overseeing/providing feedback to other classroom adults. These are obviously characteristics needed in a teacher at the end of their program of study but these are not skills that are appropriate during the lower division stage. These TPE expectations are set though for the beginning student as well as the student at the end of their program. The addition to the TPEs of literacy and math are also of concern. Evidence agrees that strong foundations in literacy and math in the early years helps to build success for children. However, a stronger indicator than either of these is social emotional development which is not specifically called out in the TPEs as are literacy and math. In addition, if it is the expectation that CCs are providing a lower division introduction to literacy and math to meet the TPEs, how is that to be done? Most CCs are CAP aligned and there is only one curriculum class in this set of eight courses in which all domains must be addressed as well as a number of other requirements. Is CDTC changing or getting rid of CAP? When will this happen? Will these TPEs only be address in upper-level coursework? Colleges will need a minimum of 2 years before they are able to offer any revised or new courses. Another area described in this proposal and the TPEs is that of behavior management coursework. Most 2 and 4-year colleges provide a behavior management course but often it has to be offered as an elective for students and is not incorporated into required coursework. Is this a change in the requirement? Will CDTC change CAP to include a behavior management course that is rooted in the Teaching Pyramid framework?

In addition, there are questions around why TPE's were created when there had already been in place the Teacher Competencies; a fully developed system that was already starting to be used across the state. This system already outlined stages of teacher preparation and

development. This is another example of the blatant disregard for systems that have been developed with messaging that early childhood must conform to the practices of K-12.

Another area of non-collaboration with this proposed PK-3 credential is that there has not been a Transfer Model Curriculum (TMC) developed from the CCC Chancellor's office. Without a TMC community colleges are not able to create transfer degrees with their local 4-year partners. Without transfer degrees in place, students are put at risk for increased financial burden and time wasted.

#### Inequity for teacher preparation students and PK-3 children

The expansion of TK and UPK targets lower income and underrepresented groups. These groups are often cited as the children and families who are most at risk of not meeting their academic and life potential. Through the current method of expansion and the currently proposed PK-3 ECE Specialist Credential, these children and families are being put further at risk because of the developmentally inappropriate approach that is being taken in teacher preparation and execution of TK classrooms across the state.

The field of education needs more highly qualified teachers, especially highly qualified teachers of color, and especially men of color especially in the early years. The proposed credential continues to put systemic barriers in place to act as a gatekeeping method that advantages particular racial and socioeconomic groups over others.

We need a section regarding community providers and the impact on changes to their programming this is having as well as the issues of children who are needing to be identified and the segregation that is happening due to local programming being told to take their child out of private care and place in a school district – Rachel Champagne??

#### Proposals

☐ Create timeline for implementation that aligns varying systems in coordination with IHEs that will be implementing

☐ Create a statewide writing team to revise TPEs and consist of an equal measure of CTC/CDE staff, CC full time faculty, and 4-year full time faculty with additional representation of families and current ECE teachers

☐ Convene regional listening sessions and roll out meetings where all IHEs are invited to participate in person and via zoom where chat features are on and meeting is recorded and archived on the CTC webpage

☐ Convene regional listening sessions and roll out meetings where all ECE professionals are invited to participate in person and via zoom where chat features are on and meeting is recorded and archived on the CTC webpage

☒ Convene regional listening sessions and roll out meetings where all families, local Offices of Education, and other community members are invited to participate in person and via zoom where chat features are on and meeting is recorded and archived on the CTC webpage

☒ Convene a statewide writing team that consists of an equal measure of CTC/CDE staff, CC full time faculty, and 4-year full time faculty with additional representation of families and current ECE teachers to fully review and revise the proposed legislation and instruction handbook so that it is equitable in language, intention, and process ☒ Require district administrators to have 24 units of ECE coursework and undergo coaching on site with local Office of Education Early Childhood technical assistance teams or similar Early Childhood experts for no less than one year

☒ Require LEA's to host listening sessions and roll out meetings within their community to develop understanding of programming already in place to help inform practices.

o Or require LEA's to have an advisory board across multi systems

☒ Require current Multi-subject credentialed teachers to have 24 units of ECE coursework that does not include loopholes to use coursework earned in their credential.

☒ At least 200 hours of practicum/field experience should be allowed to be included as part of the 600 hours of field experience rather than making a preservice teacher have to complete all of their hours within their upper division coursework.

☒ Provide coaching on site with local Office of Education Early Childhood technical assistance teams or similar Early Childhood experts for no less than one year to all new classrooms serving 3-6 year old children with the focus on developmentally appropriate learning and environments.

☒ In addition to requirements of using CA Preschool Foundations and Frameworks and K-3 Standards and Frameworks, require use of CDE created resources such as The Powerful Role of Play in the ECE Classroom and The Integrated Nature of Learning, as well as OER created DAP Handbook.

☒ Convene a writing group that consists of an equal measure of CTC/CDE staff, CC full time faculty, and 4-year full time faculty with additional representation of families and current ECE teachers that will create the course outline of record for a Behavior Management class at the CCs lower division level that is based on the Teaching Pyramid model and a secondary course at the upper division level that delves deeper into DAP behavior management PK-3  
<https://cainclusion.org/teachingpyramid/> (West Ed Report:  
[https://cainclusion.org/resources/tp/documents/research/CA\\_CSEFELReportFINAL.pdf](https://cainclusion.org/resources/tp/documents/research/CA_CSEFELReportFINAL.pdf) )

☒ Require play-based instruction/environments be the foundation of all teacher preparation for the PK-3 ECE Specialist Credential; play-based environments that are DAP and are determined to be of high-quality using valid and reliable assessment tools such as CLASS and ERS must be the placement sites for a minimum of half the required practicum hours.



## Perry School Study

[https://nieer.org/wpcontent/uploads/2014/09/specialsummary\\_rev2011\\_02\\_2.pdf](https://nieer.org/wpcontent/uploads/2014/09/specialsummary_rev2011_02_2.pdf)

- ☐ Create developmentally appropriate authorizations that can be added to a PK-3 ECE Specialist Credential for Infants and Toddlers and also for 4 th -6 th grade.
- ☐ Label CTC issued teaching credentials with one word. The siloed nature of “permit” and “credential” continues to divide the early care and education world. For the purposes of providing continuity of understanding and of career pathways, CTC can issue Credentials with level 1-5 that have corresponding coursework, experience, practicum requirements that provide entry level work skills up through master teaching and mentoring skills
- ☐ Utilize the QRIS system or other nationally recognized early childhood system to establish quality early childhood programming
- ☐ Include systems for “grandfathering in” early childhood teachers into the system to be able to be fully recognized teachers in classrooms rather than to be demoted to aide positions.