Comment Summary and Analysis
ECE Survey I: Panel Recommendations related to the Child Development Permit Matrix

**Recommendation:** Eliminate the Assistant level of the permit.

Comments Supporting the Recommendation

Overall comments supporting eliminating the Assistant level of the permit cite the view that the number of units currently required is too low to evidence any significant competency on the part of the holder of this level of the permit, and thus serves no useful purpose within the overall Matrix structure.

Sample Comments:

6 units is not enough to prepare for the classroom. Especially since those 6 units could be two classes in children’s lit and general child development. Assistant teachers, any adult in the classroom is engaging in conversations with children and families and needs to be equipped accordingly. *(Workforce member)*

Assistant teacher does not require enough ECE education to support program need. *(Workforce member)*

Cannot be left alone with children with this permit so the 6 units is not useful in Title 5 programs. *(Workforce member)*

Applicants should have more than 6 units in ECE/CD and experience before allowing them to work with children. Therefore, this level permit should be eliminated. *(Workforce member)*

I think preschool children deserve that all teachers who interact with them in the classroom are better prepared and possess a deeper and broader knowledge of Child Development. The subjects required to hold an Assistant Permit do not prepare the holders of the permit to have meaningful and intentional interactions with the children under their care. *(Workforce member)*

Many programs also have a "Teacher Aid" with no qualifications at all in charge of a group of children. I think the Teacher Aid position also should be eliminated. *(Workforce member)*

There is really no position for a person with only 6 units of CD. *(Employer)*

The qualifications are too low to have quality staff. *(Employer)*

At the ECE level, nobody actually has an Assistant teacher level permit. The amount of hours are small, and most students move to a higher level quickly by working. *(Employer)*

Most program require the minimum 12 ECE units as mandated by Community Care Licensing. Basically, unless needed or required by the program, this level really has no value. *(Other)*

I believe the number of child development units should be higher for any person work with children as should their experience. Currently enrolled in a class to meet the hiring qualifications should not count. *(Other)*

This permit level does not allow for the assistant to care for children without supervision and frankly useless to the permit holder. *(Preparer of the workforce)*

January 2017
Comments Opposing the Recommendation

Overall comments opposing the recommendation and supporting keeping the lowest level of the current permit structure cite the value of encouraging entrants in the field to become oriented to the idea of advancement through gaining more knowledge via coursework and fieldwork, and encouraging entrants to this field to the idea of professionalism based on a body of knowledge directly related to job performance

Sample Comments:
Permit level of "aide" was already eliminated, there needs to be an entry level that is not set too high to include people who enter the field and work in a classroom as an assistant role and will not increase employer's cost. *(Workforce member)*

We should keep the door open for new entrants to the field, especially assistants that we hope to encourage to move up to the next level and beyond. If and when the field ever starts paying better we can revisit this level, but minimum wage jobs require attainable steps to professionalism. *(Workforce member)*

This level provides an entry level for people to test their commitment and skills in the field and a way to grow teachers in a field that sorely needs new teachers. Many assistants add a great deal and allow for reasonable cost to allow for smaller groups and a lower ratio, both hallmarks of quality care. *(Workforce member)*

We have such a shortage of teachers, we should have options for teachers to reach different levels with the hope they grow in this field of ECE education. *(Employer)*

I've found this level to be valuable. I've often hired Associate Teacher level staff as Assistants because they have no experience in the field and it shows upon hire. They are paper qualified only and need to additional training. *(Employer)*

The Assistant teacher Permit is the Office of Head Start's recognized equivalency in California to the CDA requirement listed in the Head Start Act. *(Employer)*

You will not be giving a person the opportunity to hold a permit without having an AA degree in the field. For some people that is out of budget. *(Employer)*

I see a need for this permit level. I have experienced this is where we can recruit parents and volunteers at this level and hope they continue up the matrix and in the child development field. *(Other)*

We have a high turn over rate. An assistant teacher has many responsibilities and is qualified to work with the children. By eliminating the assistant teacher permit level, it would be difficult for teachers to obtain a permit, and to retain early childhood educators. *(Private Agency staff)*

January 2017
**Recommendation:** Eliminate the authorization for the Associate Teacher to supervise others.

Comments Supporting the Recommendation

Positive comments were few and came from several constituencies. They do not indicate a common opinion of why they agree with this recommendation.

Sample comments:
Associate teacher permit holders should not be authorized to supervise an assistant teacher but can supervise an aide or intern. *(Workforce member)*

I feel that this level should be considered an "assistant" teacher and that individuals holding this permit level should not be responsible for the sole planning and implementation of lessons. Individuals holding this permit should NOT be allowed or encouraged to supervise, regardless of experience. *(Employer)*

At the associate level, teachers should not be allowed to supervise others as they are in the beginning stages of learning about child growth and development. With 12 units, I think teachers should remain at the assistant level until they have at least 24 units and some teaching experience. *(Other public agency staff)*

Although I agree in theory, hiring in the Bay Area is extremely difficult. To remove the authorizations of staff at this level will make staffing our sites even harder and much more costly than we can manage on the current funding levels. *(Private agency staff)*

Comments Opposing the Recommendation

Negative comments came from all constituencies. In general, concerns are focused on increased costs associated with the loss of flexibility and need for additional staffing if Associate Teachers are not permitted to supervise others. The limit in scope of work could also result in lowered wages for these individuals.

Sample comments:
My organization depends almost entirely on Associate Level teachers and their ability to supervise others. There is a Master Teacher in each classroom but they cannot be present in the room (not to mention indoors and outdoors) at all times. Associate level teachers provide support for the Master Teacher and also fill in the gaps when the Master teacher has to be out of the room.

Associate Teachers provide supports for Teachers and Master Teachers to complete obligations off the floor for short periods of time throughout the day. If they were unable to supervise assistants then you would need to hire additional Teachers or Master Teachers in order to complete assigned tasks. I would only support this decision if there were a significant increase in state reimbursements that would more than adequately cover the cost of additional staffing including wages and benefits. I would also be open to guidelines such as "supervise assistants for no longer than 2 hours in one day and must have a Master Teacher in record". *(Preparer)*

Teachers who have their Associate Teacher permit and have been working in the field should be able to take a lead position for a day or two if their Lead Teacher/Supervisor is out ill. They are the ones whom the children are more familiar with and have built a relationship.

January 2017
Depending upon the geographic area the program may face challenges finding a substitute teacher who has a teacher permit or higher to come in and sub for the lead teacher when they are out. In addition, if the Associate teacher isn’t allowed to take the lead how will they then begin to work towards their adult supervision hours? (Other)

Associate Teachers are trained observers and professionals. They need to be able to utilize their skill sets to mentor parents, guide others as needed. (Other)

With a requirement of supervision and removal of authorization to supervise others, there would be no incentive for employees to seek the permit because there would be no difference professionally from the Assistant teacher. There would be no incentive for employers to pay Associates any more than Assistants because they would require the presence of at least one other teacher in the classroom, increasing staffing costs. (Workforce member)
**Recommendation:** Require direct supervision of an Associate Teacher by the holder of a Teacher permit or higher.

**Comments Supporting the Recommendation**

**Comments in favor of this recommendation site the limited education of these individuals.**

Sample comments:

12 units are not enough to provide unsupervised teaching of children. Many people have no interest or desire to move above this level of permit and will just opt out after ten years. Let’s keep them in the fold. *(Other)*

The associate teacher permit is really the beginning of an ECE career. Teachers with only these 12 units should be in a classroom with a more experienced teacher. Field work should be included as some teachers just take the 12 units and then are put into a classroom alone with no hands on experience. We will not professionalize our field if we keep the limits low. This should be a teachers starting point for professional growth. *(Other public agency staff)*

I agree to the recommendations. I love that they will be supervised by a teacher permit person and not just allowed to be alone with the children. I just think that the Associate Teacher is a way to assist teachers that has been in the field long before the permit matrix existed to make decisions on professionally growing or to retire from the field. It also allows the new inspiring teacher to become more comfortable in the field prior to releasing them with a full load of children. How will the Family Home Child Care experience count towards this permit? *(Unknown)*

**Comments Opposing the Recommendation**

**Comments opposing this recommendation represent a good sample of constituencies and are focused on the loss of flexibility and increased staffing costs. The suggestion was made by several respondents that consideration could be given to the Associate Teacher’s years of experience or level of competency. One comment noted the impracticality of requiring this for a School-Age setting.**

Sample comments:

Respectfully, I disagree with the requirement for direct supervision, because in our profession there are so many diverse programs, from privately funded to publicly funded programs. Family child care programs can be licensed without the 'provider/teacher' having a permit or Child Development coursework. In some programs the Associate Teacher may be called on to lead classrooms, especially when a lead teacher is out ill in a privately funded program. We have child care programs serving many, many children in this state. Many of those children are served in privately funded programs with teachers who have 12 units. They are leading classrooms, at least some of the time. *(Unknown)*

"Direct" supervision by a Teacher Permit or higher position would be impractical at times, such as end of the day, when there are few children in attendance. *(Employer)*

For title 5 and Early Head Start programs, the associate teacher position is critical in working with infants/toddlers and cannot always be directly supervised by a teacher level person. *(Employer)*

January 2017
**Recommendation:** Eliminate the CDA option for meeting the education requirement.

**Of note:** Four constituents (3-prepares and 1 state agency staff) supported removing this option only if the restriction on the number of renewals of the Associate Teacher permit is lifted.

**Comments Supporting the Recommendation**

Of the three comments in support of this, only one offered a rationale.

**Sample comments:**
CDA not significant in CA where majority of CAP aligned community colleges have coursework readily available. CDA not sensible when elements of QRIS encourage degree acquisition. (Prepared of the workforce)

**Comments Opposing the Recommendation**

Constituents that disagree with this recommendation are concerned about restricting the pipeline of qualified individuals into the profession.

**Sample comments:**
The CDA is a nationally recognized credential that provides foundation knowledge AND importantly, is can be provided in any language requested. It is critical to recognize the importance and value of a diverse ECE teaching workforce, and many colleges in California do not provide courses in a language other than English or are limited to a few additional languages. *(Other)*

I prefer the Associate Permit to align with the CDA requirements because this aligns with Head Start requirements. *(Other public agency staff)*

CDA is a competency based assessment which includes a requirement of 480 hours experience working with children in the specific age setting. *(Preparer)*

If we eliminate the option for CDA, then CA may not be an inviting state to move to from the East Coast. We need ECE providers, and from what I know about CDA’s, the requirements are similar to the Associate Teacher Permit. *(Unknown)*
**Recommendation:** Require Associate Teachers serving children birth-3 to have 3 semester units of infant-toddler coursework.

**Comments Supporting the Recommendation**

Comments in favor of this recommendation suggest that the number of units should be greater than three and should be applied to any level of permit holder working with children aged birth-3 years old.

Sample comments:
I feel anyone working with infants and toddlers should have minimum 6 inf/tod units and that PITC training should be required. *(Workforce member)*

Associate Teachers and Teachers should have 8 units of infant and toddler language and literacy. If California wants to close the 30-million word gap by the age of 3 in the low-income, disadvantaged children then we should make sure every caregiver serving subsidized children take at least 2 infant and toddler literacy courses. Too many adults believe that infants do not understand what is being said to them which is totally the contrary. *(Employer)*

For federal Early Head Start programs in California, each adult providing infant care must have at a minimum the Associate Teacher Permit, as well as 3 units specific to infancy. It makes sense to align all infant-toddler care with this minimum standard. *(Other public agency staff)*

Our field needs to match recent knowledge in regards to how infants and toddlers grow. *(Preparer)*

Regarding the third-to-last item, I support ALL levels on the CD Permit Matrix to require 6 units of infant and toddler development and programming for those working with 0-8 [0-13] and their families. *(Preparer)*

**Comments Opposing the Recommendation**

Comments in opposition to this recommendation are varied and note staffing restrictions and the inequitable nature of requiring some permit holders to take more units that others.

Sample comments:
Require Associate Teachers serving children ages birth-3 to have 3 units of coursework specific to the development and care of infants and toddlers allows the agency to not have flexibility of hiring infant/toddlers staff that does not have infant units can be difficultly to hire staff at times. I think this should only be required for the teacher level or higher. *(Unknown)*

While licensing names 3 of the 4 classes required -- child development; child, family and community and curriculum -- one is unnamed. Most students use the introductory course – principles and practices – as it is a prerequisite at many colleges for the curriculum class and the practicum. To add infant and toddler units will be essentially adding a fifth required class, unless one of the others is taken away. Also, the Associate in Science Transfer degree that most colleges now offer to encourage transfer to Cal State campuses does not include the Infant/Toddler class, so it would be an "extra" class for students who are working on this transfer degree. Keep in mind that financial aid is limited and most counselors will not encourage students to take this "extra" class if they are working on a transfer degree. This degree is limited to 24 ECE units because there is a limit of 60 units overall for this degree. *(Unknown)*

If adding the 3 units of coursework for infant/toddler it should be 3 of the 12 units. Not more than 12 units. *(Unknown)*

January 2017
**Recommendation:** Require candidates for the Associate Teacher permit to have 50 days of 3+ hours of experience in the last 2 years or 50 hours of practicum/clinical experience.

**Comments Supporting the Recommendation**

The common thread throughout the comments in favor of this recommendation is that experience is as important, if not more so, than classroom learning.

Sample comments:
I do not believe in permit level, but in the experience of the individual has in the field. Someone can have a Master Teacher, but when it comes to performance; that person does not have the ability to do the job. I believe in requiring anyone working in the ECE field to not just complete the units required, but to have hands-on experience in the field. I have been in the ECE field for 27 years as assistant teacher, master teacher and now center director. I interview many candidates and most of the time candidates only have knowledge about the field from school, but not from real life experience. *(Workforce member)*

These recommendations are crucial for our workforce. Field experience is oftentimes more effective in understanding the significance of early childhood education. Students coming straight out of coursework with a minimal level of experience tend to rely on what they see others doing rather than what is good and right for the children in their care. *(Employer)*

I believe the number of hours for the practicum should be increased. This is less than one unit of practicum by hours. It should be at least 2 units or 108 hours. *(Preparer)*

**Comments Opposing the Recommendation**

The comments from those opposed to this recommendation are varied and cover concerns that it may create a barrier into the field, further the candidates, or be difficult to complete.

Sample comments:
How can someone get this experience, outside of practicum...if there is not an assistant level? *(Preparer)*

I am a bit afraid that by requesting the # of hours of practicum may eliminate people who have a degree in a related field and past experiences. *(Private agency staff)*

I'm not sure how possible it will be for ECE students to complete 50 hours of practicum. This would probably require at least one more quarter of college after completing the 12 units of ECE coursework. *(Other)*

Not sure why 50 hours of practicum - perhaps a 3 unit practicum course can be used instead of the 50 days. *(Preparer)*
**Recommendation:** Allow unlimited renewals of the Associate Teacher permit and, for each 5 year renewal, require 105 hours with a minimum of 21 hours per year of professional growth activities aligned with adopted competencies.

*This recommendation had the greatest number of comments of any related to the Associate Teacher permit. There were 50 positive comments and 29 negative. All constituencies left comments for this item.*

**Comments Supporting the Recommendation**

The responses in favor of this recommendation indicate that many good Associate Teachers are lost because they do not wish to or cannot move on to the Teacher level of the permit.

Sample comments:

I believe it is important for our associate teachers to have some education and some experience to show their dedication and interest in the field but some associate don’t feel the need to continue school and that should be okay. They should be able to renew their permit as many times as they would like with professional development hours as a requirement. *(Workforce member)*

If a teacher is comfortable in their position as Associate Teacher, why should we place restrictions on the number of times they can renew in order to either force them to increase their permit or drop their permit and leave the field? *(Employer)*

We lose staff who cannot afford to continue their education. This change will lead to more stability and continuity of care in the field. Not everyone needs to be a fully qualified Teacher. *(Employer)*

Removing limits on renewal will be especially important if the Assistant Level is eliminated. Aligning required professional growth to the competencies is a great recommendation. *(Other)*

This would permit teachers who love teaching to remain as teachers, and yet stay current regarding pedagogy. *(Preparer)*

There are professionals that love being Associate Teachers and do not want to move up to Teacher and I feel it is not fair to penalize these professionals by not allowing them to continue renewing their permit. *(Private agency staff)*

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Comments Opposing the Recommendation

Individuals that commented in opposition to the recommendation feel that candidates need to be pushed to advance or that the professional growth requirement places a financial burden on candidates.

Sample comments:
The limitations of renewal which are generous, encourage the teacher to continue to grow educationally and move forward to better position and pay in the field. *(Workforce member)*

If you remove the number of years those who hold this permit with stay in that level and remain stagnant. *(Employer)*

There is a compensation issue that needs to be addressed at each level, but we certainly want to see individuals aspire towards the next teaching level for better quality programs. *(Other)*

105 hours of professional growth is way too much for associate teacher renewals. *(Other public agency staff)*

Education level is an important indicator of teacher quality. Continue to require people to move forward in their education by working towards a Teacher Permit. *(Preparer)*

Leave the Associate Teacher permit renewal requirements alone. Regarding the 105hrs of professional growth and asking folks to complete at least 21hrs per year, how would that be monitored? Let folks complete the 105hrs of professional growth at their own pace. In some areas of the State professional growth activities are not consistently offered or easy to get to. *(Private agency staff)*
The comments on all four recommendations related to the Teacher level of the permit had a common theme: more education may be better but it is not feasible at this time. It will likely exacerbate the existing shortage because individuals either cannot afford to pay for more coursework or higher degrees (forcing them out of the field); or, if they can afford it, they will seek out higher paying jobs. Responses also talk of increased costs to parents because as education requirements increase, salary levels will increase. Additionally, there is much talk of balancing the requirements of coursework and experience. There are many who feel that experience cannot be replaced by coursework.

Comments Supporting the Recommendations

AA Degree or higher in ECE should be the minimum requirement. *(Employer)*

I like the option 2 idea in which renewal requirements would be applicable towards a BA. I think that the experience needs to include specific practices within course work, so that students are performing the expectations of Child care providers at this level. *(Other public agency staff)*

To be consistent with what is proposed for Associate Teacher, the Teacher Permit should also require coursework specific to infancy. Such coursework could be either within the degree package or in addition to the degree package, in response to the unit restrictions placed on students who pursue a transfer degree restricted to 24 lower division units in the major. *(Unknown)*

I think it is important that teacher continue their education but not forced to get a b.a. In order to renew. They should be able to work towards a master permit if they see fit or stay at their current level. Experience is a must at this level and very important. *(Workforce member)*

I agree with the idea of teachers having more professional education. Truly, truly I do. However, I'm sorry, but the pay just isn't there. It has taken me over 12 years of teaching to reach earning $20 per hour. I didn't know at age 18 that teaching was my passion, so my degree is not in the field. If I had had to go back and earn a Bachelor's in ECE or fulfill these other suggested academic requirements, I'd be in debt up to my eyeballs with no hope of ever making enough to repay loans and move on with my life. I suppose that Community Colleges are less expensive for getting some of the classes in, but you must bear in mind that our financially strapped community colleges have done nothing but cut the ECE classes that are offered. Some, maybe even many, of us would simply be unable to fulfill the requirements based on what's available in our areas. *(Workforce member)*

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Comments Opposing the Recommendations

Some of these changes will leave people unemployed or unable to advance in their career. *(Workforce member)*

Requiring a Bachelor’s Degree in ECE does NOT insure the quality of instruction and care! And it WILL drive up the compensation unjustifiably as it relates to performance.....thus undermining the integrity of programs both state funded and private!! EXPERIENCE is far more reliably relevant to the quality of care and education!! *(Employer)*

I think if we require an AA/AS that would be sufficient for Teacher Level permits as requiring a BA for the permit would limit a lot of good teachers. the BA requirement for classrooms can be met by other regulations. *(Employer)*

I work with many people who are trying to obtain or maintain permits. They struggle to complete the classes they need while working and raising families at the same time. This proposal is so different from the current matrix and would cause quite a hardship on some people that I would not be happy to see it written up as an unwavering expectation. There is very little financial payoff for a person to go forward and get their degrees ECE. Most are trying to maintain their permits so they can continue working. Also, it’s more and more difficult to find a way to complete the student teaching aspect of this requirement. *(Preparer)*

My concern with these requirements is with the educational system in CA. Is anyone looking into the availability of classes during times where working people can attend? *(Preparer)*

I’m supervising 20 ECE teachers daily; I have seen some teachers need more experience with understanding data and how to articulate to parents. I believe when someone holds a teacher position; that person needs to be knowledgeable not just the education part, but also the tools required in the field. Let’s help teachers become more knowledgeable about the tools in the field. *(Workforce member)*

I am concerned that the student teaching requirement will be difficult for some who is already working. How will they be able to fulfill it and still earn a living / keep their job? *(Workforce member)*

There are no options for student teaching or clinical experience in our very rural counties. *(Employer)*

It may be a challenge for Family Childcare providers to obtain the required 210 hours of clinical experience outside of their Family Childcare hours. Many work longer hours than childcare centers. *(Other)*

January 2017
**Recommendation:** Change the title of the Master Teacher permit to Teaching Specialist.

**Comments Supporting the Recommendation**

Comments in support feel that Teaching Specialist is a better descriptor of this permit level.

**Sample comments:**
I think the Master Teacher level is just a frivolous title. Teaching specialist makes the position, a good interim position between teacher and site supervisor. *(Other)*

I agree that the master teacher is more of a specialist rather than a "master" teacher. *(Preparer)*

I like the name change to better fit this role of one to improve quality and coach others. *(Workforce member)*

**Comments Opposing the Recommendation**

Comments in opposition feel that Teaching Specialist describes a non-teaching position.

**Sample comments:**
I would like to keep the Master Teacher Permit instead of Teaching Specialist Permit. Teachers in ECE are not specialists, but teachers. I believe specialists hold higher degree than just AA or BA. Teachers are not about to diagnose anyone and so teachers are not specialists. *(Workforce member)*

The title Master Teacher conveys the required skill and deserved respect better than Teaching Specialist. *(Workforce member)*

I don't understand the benefit to the field with the name change. A "master" may be thought of as someone who has mastered a variety of strategies to teach young children and mentor those individuals interested in joining the field. A specialist, on the other hand tells me that teaching, learning, and coaching is their primary job. Their ability to provide responsive and engaging care would be at risk while they are coaching adults. *(Employer)*

Title should remain "Master Teacher". Terms should align with elementary and other teacher. Teaching specialist does not sound like a master teacher which would be a well qualified educator. Teaching specialist sounds like a specialist that would come into the classroom to work with children separately or to support the master teacher. *(Other)*

"Teaching Specialist" is an odd choice of terms... Specialist in what? Teaching? This individual is a Child Development Specialist if wanting that specific terminology. The Master Teacher demonstrates the teacher is "Master" at the craft of teaching. Also, beware the Teaching specialist may be interpreted as a "coach" only. *(Preparer)*

January 2017
**Recommendation:** Revise the authorization statement for the Master Teacher permit to reflect coaching support related to quality improvement

**Comments Supporting the Recommendation**

There were few comments in support of this recommendation.

Sample comments:
This level should serve as a coach and not have the duties of a site supervisor. *(Employer)*

**Comments Opposing the Recommendation**

Comments opposing this recommendation either do not understand what is meant by coaching (request definition) or do not agree that is appropriate to assign these duties to the Master Teacher.

Sample comments:
Given the complexities who has access to coaches and the variability of quality and expertise in coaching work, I think it is neither appropriate or necessary to add "coaching support related to quality improvement" to the permit matrix. *(Preparer)*

Tying the site coaching function to a particular permit is unwise. It limits the pool of those who might effectively fill the coach function; and academic content alone does not guarantee that permit holder has coaching disposition/competence. *(Other public agency staff)*

The Master Teacher needs to be in a classroom teaching rather than supervising. While a BA is highly sought after it should not be the standard for this level or position. *(Workforce member)*

Coaching is a popular policy strategy at this time, but there is not capacity, there are not standards for coaching, its expensive and does not address the low compensation in Title 5 program based on under funding by the state, while public institutions of higher education are not funded to deliver at the rate needed for these changes. *(Other public agency staff)*

January 2017
**Recommendation:** For the Master Teacher permit, course work related to pedagogy must address the full developmental range (infant/toddler, preschool, school age).

**Comments Supporting the Recommendation**

Of the three comments in support of this, only one offered a rationale.

Sample comments:
A range of course work in School Age / Infant & Toddler / Preschool (this is a given) should also include Special Needs. *(Preparer)*

**Comments Opposing the Recommendation**

Constituents that disagree with this recommendation are particularly opposed to including the school age requirement.

Sample comments:
I don't believe that a full range from infant/toddler-school age should necessarily be required because not everyone is interested in working with all of these age groups. Each individual should have a choice as to which age group suits them best and should seek to be educated in that age group. In turn centers/organizations should hire according to the age group an individual wants to work with. That may or may not include all age groups. *(Workforce member)*

If working with preschool age children, teachers should not take school age courses. We only serve 2-5 year old children and the school age child is completely different mentally, emotionally, and physically. By making these changes, it will be harder for staff to work at a preschool facility. *(Private agency staff)*

ECE may well cover 0-8, but the majority of employees are working in the 0-5 range. If they choose the age 5-8 range they earn a multi-subject credential. To require ECE students to complete practicum, clinical, or even coursework in the 5-8 age range is unreasonable, and would significantly add to the coursework currently required. Common Core is very different to ECE - we need to have a clearer demarcation that ECE ends at age 5 for the purpose of permits or credentials - there isn't an overlap in reality, other than in after school programs, which don't provide quality programming anyway. *(Other)*

January 2017
**Recommendation:** Require candidates for the Master Teacher permit to have two years of experience as a Child Development Permit Teacher.

**Comments Supporting the Recommendation**

Comments in favor of this recommendation feel that 2 years’ experience is not enough.

**Sample comments:**
A master teacher should have at least 7 years classroom experience *(Employer)*

This change is greatly needed to make this permit more desirable. We have teachers working associate position who hold higher permits with no actual experience but yet the title they hold in their permit is higher than the position they hold. *(Other)*

I’m not sure that 2 years of experience is enough to be a teaching specialist. *(Unknown)*

Also, I disagree to the new minimum requirements of 2 years of experience as a CDP teacher in order to be classified as a "Specialist" because I don’t think that is nearly enough time for someone to be classified as a Specialist. I would recommend at least 4-5 years. 2 years as a teacher is considered getting their feet wet! There is so much that is learned within the first 5 years. I would hate to short-change anyone of this experience and knowledge. This is for the children and our society, not just for granting people titles and more money! *(Workforce member)*

**Comments Opposing the Recommendation**

Comments in opposition to this recommendation feel that the requirement is unnecessary or could be reduced.

**Sample comments:**
I do not agree that teachers should be required to have a permit for 2 years before applying for a Master Teacher permit. Currently, I have teachers who received their Bachelor’s Degree and were able to get a Master Teacher permit. They did not have a permit before but were teacher assistants at our school previously. Requiring them to have a permit for 2 years before applying for the Master teacher permit would not have allowed us to give them as much authorization as we did. In the end, it is up to their supervisors how much or how little authorization is given to permit holders. *(Workforce member)*

The requirement to have had work experience is not needed and is burdensome. For example, teachers with a multiple subject degree do not have a requirement that they have had experience teaching. Instead, they have well-supervised clinical experiences and an induction period. This model would be better for ECE teachers, although then ECE teacher preparation programs will need better funding. *(Preparer)*

I think one year experience could in some cases be sufficient. If the agency or company wants to require 2, let it be in their own internal policies and procedures. *(Preparer)*

January 2017
**Recommendation:** Revise Option 1 of the education requirements for the Master Teacher permit to have an earned baccalaureate degree in ECE/CD.

**Comments Supporting the Recommendation**

Some comments in support of this recommendation also suggest that majors other than ECE/CD should be considered.

Sample comments:
- I do not believe that the bachelor degree has to be specific to early childhood education. I believe having a bachelor's degree in any subject with additional units in child development aligning with the matrix for permits should be satisfactory. *(Private agency staff)*

- Earned baccalaureate degree should include related field, not just ECE and CD. *(Preparer)*

- A BA in ECE should be preferred because a BA in any other field does not require students to complete any course work in ECD. *(Preparer)*

- Master Teachers should definitely have a Bachelor's Degree in the field of Education or ECE. No exemptions. *(Other)*

**Comments Opposing the Recommendation**

The comments from those opposed to this recommendation site the limited availability of ECE Bachelor's degree or defend the Associate's degree as a sufficient level of education.

Sample comments:
- Option 1 should be an AA degree. Our best teachers come out of community college since it is more specialized. Our BA teachers are working towards teaching credentials for public school and often have a more "instructional" approach rather than developmental. But I do strongly agree that this position should hold at least an AA degree in ECE with adult supervision units. *(Employer)*

- I believe that they should have a AA degree in ECE. With that they should receive all the training's necessary to qualify them in the field of ECE. *(Employer)*

- This permit level would be appropriate to require the individual have earned a AA in child development and be working towards a BA in child development in order to renew. I am a bit confused why specific requirements (21 hours of adopted competencies yearly) are required. Multiple subject and single subject credential holders are not required to complete a total number of specific, adopted competencies per year. Additionally, this requirement may discourage teachers from pursuing an MA, as the coursework may not count because it is not in the area of the teacher's stated specialization. *(Unknown)*

- There are not many 4 year colleges that offer a degree in ECE and CD so making this one of the options is actually very limiting. Also, just having a bachelors degree does not qualify a person to be a Master Teacher. This takes years
of experience to become competent.

(Unknown)
**Recommendation:** Revise Option 2 of the education requirements for the Master Teacher to have an earned baccalaureate degree in any discipline, with 36 semester units of ECE/CD, including adult supervision and 18 units of upper division coursework.

**Comments Supporting the Recommendation**

There were no comments that supported this recommendation outright. Instead, comments recommended alternatives.

**Sample comments:**

I disagree with revising option 2 to require a Bachelor's degree in any field plus 36 units in ECE/CD. I have student teachers who are majoring in something other than ECE/CD but are minoring in ECE/CD. A minor in ECE/CD only requires the student to take 21 units. *(Workforce member)*

Right now the MT is just a simple class away from teacher and many skip it to go to Site Supervisor. I love the idea of requiring a BA for this level to truly signify a "specialist". *(Employer)*

I don't agree with allowing "any earned degree" for option 2, it should be a degree in child development or related field. *(Other public agency staff)*

I STRONGLY agree a BA degree is necessary, but am strongly against requiring a degree in ECE/CD. I advocate an interdisciplinary degree with foundational early childhood coursework; however, 36-units is too many unless inclusive of K-3 pedagogy. Helping early childhood teachers understand pedagogy of reading; pedagogy of math; and pedagogy of special needs, as well as some K-3 discourse is reciprocally beneficial to both K-3 and Birth to 5 teachers. Allowing more than 25% of the coursework to come from K-3 studies to meet the 36 unit requirement will change my response to strongly agree. The language would then need to change to "semester units in ECD/CD/ED" (i.e. Early Childhood Development, Child Development, Education). *(Preparer)*

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Comments Opposing the Recommendation

The comments from those opposed to this recommendation are generally opposed to allowing a BA in a major other than ECE/CD.

Sample comments:
I see little value in a Baccalaureate degree in any discipline. This teacher still has only 36 units in ECE. *(Employer)*

A master teacher option 2 should have a BA in ECE or related field, not a degree in a different field with few courses in ECE. *(Employer)*

Although education is important, I also believe we should encourage people to stay in the field by moving up in the permit and job ladder. Requiring master teacher level applicants to have already obtained a BA will eliminate many experienced teachers who may be working towards an advanced degree but have not yet attained one. Additionally, I have observed that most of the practical courses in working with young children are offered at the AA level. *(Preparer)*

I don't agree with allowing "any earned degree" for option 2, it should be a degree in child development or related field. *(Other public agency staff)*
**Recommendation:** For each 5 year renewal, require 105 hours with a minimum of 21 hours per year of professional growth activities aligned with adopted competencies.

**Comments Supporting the Recommendation**

There was only one comment in support of this recommendation.

**Sample comments:**
are the number of professional growth hours going up from 105 to ? or not...I think there needs to be more professional development hours completed in 5 years to stay current in the field. *(Other)*

**Comments Opposing the Recommendation**

The comments opposing this recommendation mirror those of other levels of the permit asking to give latitude to permit holders rather than require a minimum 21 hours per year. Some comments suggest 105 hours is too much to ask. At least one commenter suggested that professional growth should not be required at the higher levels of the permit.

**Sample comments:**
I just paid for the renewal of my master teacher permit and was surprised to see that I had to renew when I have higher permits. If you love what you are doing it is easy to stay informed and better for the children. *(Other)*

Teachers at this level should be required to have on-going professional development however it may be more difficult to require at least 21 hours of professional development "aligned with adoptive competencies." What does that look like? Does that mean staff training at your site, only college offered classes, First aid training, all of the above? This should be clearly defined. *(Workforce member)*

The annual professional growth hours is excessive. For nurses, we need 32 hours over 2 years. *(Other public agency staff)*

Also I have a concern about requiring at least 21hr of professional growth each year for renewals. Let folks earn their 105hrs of professional growth at their own pace because too many factors determine when one is able to complete their hours. Would a person's 105 hrs not count if one year they were only able to complete less than 21hrs due to health issues, family commitments, financial struggles, and or limitation of professional development

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opportunities? Monitoring of this would be a nightmare. *(Private agency staff)*

see prior comments about only having this level of professional development hrs if it is paid and programs are provided coverage in some way. My husband is a doctor and only 120 hrs over 5 yrs is required. For such a low paid field, this seems an unreasonable burden on individuals. *(Workforce member)*
**Recommendation:** Provide that the Teaching Specialist (Master Teacher) may add an Administrator authorization to serve as a Site Supervisor.

Since this recommendation indicated that requirement would need to be developed, some survey respondents provided input.

Many who fall in this category often possess a site supervisor's permit but they do need some experience to be able to function in that administrative position. However, they should possess some units in supervising adults. *(Workforce member)*

I think the Administrator authorization should require a Master’s degree. *(Workforce member)*

Keep Site Supervisor Permit, however, have the Teaching Specialist/Master Teacher be able to function as a supervisor (with extra admin units) if needed in the absence of a director or supervisor due to illness or out of town conferences. *(Employer)*

If the authorization is added by an administrator, will this allow the teaching specialist to upgrade to a program director? Whether or not the teaching specialist is "officially" titled as a site supervisor by employment status, but is placed as a acting site supervisor? Will the time of experience be considered? *(Employer)*

The master teacher permit does not require the same administration units and would need to be addressed. *(Employer)*

I’m unclear why the Teaching Specialist “may” add... would eliminate the Site Supervisor permit when the Program Director permit is more comprehensive. *(Employer)*

Many teachers who are very skilled in their work and are willing to coach other teachers do not want administrative responsibilities. The site supervisor designation is for administrative tasks which are often out of the classroom and office tasks. *(Preparer)*

Master Teacher Level Should have more focus on Teaching and not administration practices. If a candidate has the requirements, they will apply for the supervisory permit. *(Unknown)*

How much time will the current Master Teachers be allowed to achieve the new requirements? Will the master teacher be required to supervise a preschool, adults, or supervised by a director to add the Administrator authorization? How will the Family Home Child Care experience count towards this permit? *(Unknown)*

The teaching specialist should be a permit just for lead/head teachers. The supervisor permit should be specifically for supervisors. Although some programs have positions where teachers are in the classroom as well as perform supervisor duties, I do not think that is a good idea if your trying to create a quality program. Each position has specific duties and requiring a staff member to do both takes away from quality teacher-child interaction and or effective supervision of center. *(Unknown)*

Yes, I agree to Master Teacher having the opportunity to add a Administrator authorization to there permit/credential and if you are a Mentor Teacher. *(Unknown)*
If the Master Teacher and Site Supervisor levels are going to combine, then there should be 3 units of Admin tied to it and years of experience attached. *(Unknown)*
**Recommendation:** Eliminate the Site Supervisor permit since a Teaching Specialist (Master Teacher) with an added Administrator authorization could perform these functions.

**Comments Supporting the Recommendation**

Positive comments were few but representative of all constituencies. In general, the field seems to feel that the preparation for the Site Supervisor is either inadequate, a roadblock to advancement on the matrix, or that Master Teachers are already being used in this capacity.

Sample comments:

This is great idea as I expressed in other comments their is no value in holding this permit because you don't really need it to be a site supervisor. *(Other)*

Much better. The current matrix implies that Master teacher is at a lower level than the site supervisor. Teachers should have the option of specializing in administration or curriculum/child development. *(Preparer)*

Bakersfield City School District ECE state Pre-k teachers do not have the option or positions available of becoming a Site supervisor since we work directly under a School principal. As a site supervisor permit holder and have a Masters degree in the ECE field, the supervisory field experience is hindering my advancement of becoming an Program director. *(Employer)*

**Comments Opposing the Recommendation**

There were many more negative comments related to this recommendation. The field seems to feel strongly that a teaching path and a supervisory/administrative path are not the same, require different skill sets and attract different kinds of people. Also, there is strong concern that eliminating this permit might put programs out of alignment with Title 22 and Title 5 requirements.

Sample comments:

There are those who leave the classroom for administration roles, the site supervisor shouldn't have to be a Teaching Specialist first. This permit holder should be able to move from teaching to admin if that is a better fit for his or her skills. I would like to see this level of permit require more competency in business management and technology. The Teaching Specialist can collaborate with the Site Supervisor on curriculum and instruction. *(State agency staff)*

A site supervisor has difficult job. The teachers need to focus on caring for the children and preparing them for kindergarten. We need to have an administrator on site. The teacher will not be focusing on the children if they have to perform administrative duties. *(Private agency staff)*

The site supervisor permit creates a clear delineation between those that can lead a site and those that can lead children. It is a strong alignment with the organizational structure of larger programs. *(Preparer)*

It is important to support the distinction between both roles. While utilized differently, a Site Supervisor permit is the charge of responsibility of a program operation and the
Teaching Specialist is emphasis on program with support to program operation. (Other)

Head Start and other programs have multiple sites where it is necessary to have a "Site Supervisor" in place of an onsite director. I believe the title helps CCL and others make the connection to Supervision (Authorization). (Employer)

There are different roles and responsibilities between Site Supervisor and Teaching Specialists. Site Supervisors are not in the classroom daily conducting and facilitating learning for children. Site Supervisors are overseeing the site, provide support to teachers and other staff and act as leaders for others at the center. Teaching Specialists are the people teaching children in a daily basis. They focus on completing screening and assessment with the children and then submit the reports to Site Supervisors to review and input into the system. (Workforce member)
**Recommendation:** Change the title of the Program Director permit to Program Administrator.

**Comments Supporting the Recommendation**

Changing the title appeals to some but also seems to be raising the question of whether these individuals will be permitted to apply for the Administrative Services Credential.

**Sample comments:**
If we are thinking of changing the title to Program Administrator, will the permit allow the holder to also work in the K-12 setting? *(Unknown)*

The Administrator title does sound more professional. Would Program Administrators thus be able to apply for an Administrative Credential with all of their years of teaching and often times their years of actually serving as administrators of school sites and programs? *(Unknown)*

**Comments Opposing the Recommendation**

Comments in opposition to this recommendation were based mostly on semantics. Respondents feel that administrator connotes a lower level position than director. Also, there is concern that the renamed permit will be out of alignment with Title 5 requirements. Mostly, respondents questioned the reason for the change.

**Sample comments:**
The title "administrator" absolutely does not reflect what teachers, families, and the community has come to know and expect from the person in charge of their children and their employment. Administration communicates "paperwork" while Director communicates "in charge and responsible for the entire operation." *(Employer)*

Program Administrator means someone who is just an office...there is a distance to the title. *(Unknown)*

Changing the title to Program Administrator would require alignment with Title 5 contract requirements, and could create conflict as the Permit holder may not be considered for employment as an administrator. *(Unknown)*

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**Recommendation:** Revise the authorization statement for the Program Director to reflect coaching support related to quality improvement.

**Comments Supporting the Recommendation**

In general, comments were not explicitly supportive of this recommendation. Rather, respondents requested clarification or recommended clarifying language.

Sample comments:
- Include knowledge and awareness of assessment tools and their administration—strengths and liabilities. *(Preparer)*

  So are you suggesting a coach should have Program Administrator qualifications or Teacher Specialist (Master Teacher) qualifications? *(Private agency staff)*

  Reflective coaching needs explanation...I'm wondering about documentation for renewals. *(State agency staff)*

  Coaching and support under the authorization is very vague. What should say is that the Program Director will provide guidance, support and leadership to assist staff with ensuring the implementation of quality services. *(Unknown)*

  "Quality improvement" is too vague of an identification to be used in the Permit. What does would qualify as "quality improvement" What if our current QRIS is defunded? *(Unknown)*

**Comments Opposing the Recommendation**

Comments opposing this recommendation suggested that people serving at Program Directors were likely not responsible for coaching activities.

Sample comments:
- There are a lot of Program Directors who do not do coaching or training of their Teachers. A requirement for this permit should include having 1 year experience of working with adults. *(Unknown)*

  I still support coaching support from someone other than the program director for quality improvement. The director should also possess these skills. *(Other)*

  Admin does not have to be coach & may want to separate coaching from admin/supvn duties. *(Private agency staff)*

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**Recommendation:** Revise Option 1 of the education requirement for the Program Director permit to require possession of a baccalaureate or higher degree with 15 semester units in management/administration/supervision/leadership/policy including six administrative units and two adult supervision units and 24 units ECE/CD including coursework related to serving infants and toddlers.

**Comments Supporting the Recommendation**

Respondents favored the addition of coursework in management/administration/supervision/leadership/policy even while having concerns that 15 units of coursework in this area are not currently being offered or suggesting that the units be specific to ECE/CD settings.

Sample comments:
More definition is needed for the 15 units, as these could be completed relative to other industries which doesn't align with the unique characteristics needed for ECE program administration. *(Other)*

While in agreement, courses would need to be developed for the management/administration/supervision/leadership and policy specific to ECE programs. I am not aware of more than 8 units being offered in these areas at CSU's or Community Colleges. Current admin credential programs do not address the needs of ECE programs. *(Preparer)*

Doesn't specify lower or higher division leadership units. *(Employer)*

Program Administrators MUST have collegiate-level knowledge of business administration in addition to ECE/CD in order to recruit and retain high-quality staff and practice effective outreach. *(Workforce member)*

**Comments Opposing the Recommendation**

Comments in opposition suggest this permit level does not need the infant/toddler units and that 15 units of administration, etc. is excessive. Also, with the requirement of 15 units “including” 6 admin and 2 adult supervision, there is concern about the odd number remaining: 7.

Sample comments:
Currently there are only six administrative units and 2 adult supervision units available in the areas of management/administration/supervision/leadership/policy, unless an individual repeats courses at another college or obtains administrative units outside of the early childhood/child development department. *(Unknown)*

Limited classes are offered in management/administration/supervision/leadership/policy. New classes would need to be developed or classes like: small business budgeting, basic HR policies, conflict resolution would need to be accepted from the business programs of the local collages. *(Employer)*

If we’re going to require units on administration, I hope they incorporate leadership models for home-based care! Administration in that setting can be quite different. *(Other)*

15 semester units in administration will create a barrier to many students. Even lowering this to 12 units would make this option more affordable and time-efficient. Many business courses that would work well for the
administrative units are 1 or 2 units, so getting up to 15 units could take a great deal of time, especially when those courses may not be offered very often. Six units beyond the six ECE administration units will be plenty to make sure the program administrator is fully qualified. (Preparer)

I don't believe everyone should be forced to take infant/toddler courses or school age courses if they do not plan on working with children 0-12. Not all directors/administrators lead centers with infants and toddlers, preschool, and school age. (Workforce member)
Recommendation: Revise Option 3 of the education requirement for the Program Director permit to require a multiple subject teaching credential with units and field experience as listed in the current Option 2, with 12 units that include specification of areas of competency needed for ECE/CD and 6 units of administration.

Comments associated with this option for obtaining a Program Director Permit indicated that respondents did not understand that all options would be available. Also, applicants did not appear familiar with the current options and were confused by the reference to Option 2 (from the Commission’s leaflet).
**Recommendation:** Revise Option 4 of the education requirement for the Program Director permit to require a Master's degree in ECE/CD or Child/Human Development that includes 15 units of management/administration/supervision/leadership policy including 6 administration units and 2 adult supervision units.

**Comments Supporting the Recommendation**

Those supportive of this recommendation feel the Master's degree should be the minimum education requirement.

Sample comments:
I agree that a program administrator should in fact be an administrator! A masters degree would be ideal! *(Other public agency staff)*

Program Director should have at a minimum M.A. Degree. This would differentiate the level of education and knowledge an individual is able to provide. We are constantly saying we want the ECE field to be professional, but do not want to make the changes necessary. Teachers and Site Supervisors should have B.A. Degree, Assistants/Associate should have an A.A. Degree, and Directors should have a Master's Degree. *(Employer)*

A Program Director definitely needs to have Master Degree in Human Development (not any other fields). Needs to have a high work ethics and must be a great mentor coach to her subordinates. *(Unknown)*

**Comments Opposing the Recommendation**

Comments in opposition suggest the field would like to see a broader range of possible majors for the MA.

Sample comments:
I particularly disagree with Option 4 requirement re: 15 units of Admin/Leadership policy. This represents at least 5 courses - half of a masters program that excludes some current areas of research and concerns - I do agree quality is and should be added to this responsibility, but this seems to be moving toward a much narrower and prescriptive masters degree. *(Preparer)*

I agree that under option 1 a BA with 15 units in management and so on but not for option 4 for MA holders. There is more freedom in choosing courses for a BA but not for MA programs. I received a MA in EC but the program did not include 15 units in management or the other topics. Changing option 4 to require a MA and the 15 units would require most people to receive an MA and then take extra courses outside of the program in order to meet requirements in option 4. *(Workforce member)*

Though option 4 is good, it should also include Master's Degrees in education. *(Employer)*

I think the Master's Degree can be more broad to include business, administration, education as well. *(Employer)*

I feel administrators should have Master Degrees with business organizational and management requirements. *(Other public agency staff)*

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I think this will discourage people from getting Master’s degrees in ECE as most do not include 15 units of management/administration unless they are specifically in leadership. (*Unknown*)
**Recommendation:** Require candidates for the Program Director permit to have five years of teaching experience with students aged birth to 12.

Comments associated with this option fell into two categories: those who felt that 5 years of teaching experience was excessive (nearly all respondents suggested 3 years as sufficient) and those who questioned the “birth to 12” requirement. Again, most respondents maintained that experience consistent with the field should be with birth to 8 year olds.
**Recommendation:** For each 5 year renewal, require 105 hours with a minimum of 21 hours per year of professional growth activities aligned with adopted competencies.

Comments on this recommendation were strongly opposed to requiring 105 hours of professional growth activities for this level of the permit. Most respondents felt that there were not enough opportunities for professional growth at this level and that the time commitment for a Program Director were hinder their ability to complete 105 hours over five years, let alone 21 hours per year. Additionally, there was concern over limiting the activities to those related to “adopted competencies” particularly without defining those competencies.