

# **Advocacy Recommendations on Teacher Qualifications**

## **Re: Amended Article 47 – Impact on Childcare Centers**

We respectfully submit the following recommendations and requests for clarification regarding teacher qualifications under the amended Article 47. These changes, if applied without flexibility, could have significant impacts on non-3K childcare centers' ability to recruit and retain staff.

### **Key Recommendations**

- Accept foreign experience: Recognize documented early childhood teaching experience from licensed childcare centers abroad.
- Broaden accepted fields: Expand eligible fields of study/experience for preschool teachers (ages 3+) to include Child Development, Psychology, Elementary Education, Social Work, Art Education, Music Education, Physical Education, Speech and Language Pathology, Occupational Therapy, Human Services, Nursing (pediatric/early childhood), Montessori Certification, and Teacher of Languages (Linguistics).
- Preserve staffing equity: Ensure childcare centers without Universal 3K are not disadvantaged by DOE-level requirements that make it difficult to compete for teachers.
- Revise experience requirement: Allow teachers with 3 years of verified teaching experience (instead of 5) to qualify as lead preschool teachers. Many assistants thrive and grow into excellent leads within this timeframe, and a degree itself is not equivalent to three years of training.

### **Clarifications Needed**

- Age transitions: Can children remain with the same teacher until 3 years 11 months (3.11), or must they change classrooms immediately upon turning three?
- CDA requirements: If a teacher holds a CDA, is a study plan still required? If so, what is the completion timeline, and can short breaks in enrollment be permitted? Does a teacher need to prove they are enrolled in school or have a plan to enroll in school within a certain time window?
- Experience-based qualifications: Will a teacher with only a high school diploma but 3+ years of verified experience (supported by references and resume) qualify to serve as a preschool group teacher under the new rules?

Without clear guidance and flexibility, the new requirements may unintentionally create inequities between DOE 3K programs and private childcare centers. We urge DOH to provide clarity, expand eligibility, and allow broader recognition of professional and international experience so that all schools can continue to deliver high-quality early childhood education.

## **Detailed Advocacy Points**

### **Acceptance of Foreign Experience**

- Accept documented foreign daycare/early childhood teaching experience toward teacher qualifications.
- Many strong candidates come with years of licensed teaching abroad; this should be recognized.

## **Expanded Acceptable Fields of Study/Experience (Ages 3+)**

- Child Development
- Psychology (child-focused)
- Elementary Education
- Art Education
- Music Education
- Physical Education
- Social Work (child/family-focused)
- Speech and Language Pathology (early childhood focus)
- Occupational Therapy (pediatric focus)
- Human Services (child/family-focused)
- Nursing (pediatric/early childhood background)
- Montessori Certification (AMS/AMI)
- Teacher of Languages (Linguistics)

## **Equity Between DOE and Non-DOE Centers**

- Not all schools have Universal 3K.
- If DOH requires childcare centers to meet the same qualifications as DOE/3K programs, staffing will become nearly impossible because:
  - Teachers will prefer DOE jobs (shorter hours, summers off, DOE benefits).
  - Childcare centers without 3K will struggle to attract and retain teachers.

## **Clarification Needed on New Requirements**

- Age transitions: Can children remain with the same teacher until 3 years 11 months (3.11), or must they change classrooms immediately upon turning three?
- CDA requirements: If a teacher holds a CDA, is a study plan still required? If so, what is the completion timeline, and can short breaks in enrollment be permitted? Does a teacher need to prove they are enrolled in school or have a plan to enroll in school within a certain time window?
- Experience-based qualifications: Will a teacher with only a high school diploma but 3+ years of verified experience (supported by references and resume) qualify to serve as a preschool group teacher under the new rules?

## **Key Requests**

- Accept foreign daycare teaching experience.
- Broaden eligible fields of study/experience for preschool teachers.
- Revise experience requirement from 5 years to 3 years to allow qualified assistants to move into lead teacher roles sooner.

- Provide flexibility for non-3K centers so they can remain competitive in hiring.
- Clarify CDA requirements, age transition rules, and experience-based qualifications.

## **Contact Information**

Please feel free to reach out at any time during the school year:

■ Email: [bridgepark@kinderprepmontessori.com](mailto:bridgepark@kinderprepmontessori.com)

■ Tadpoles Parent Communication App

☎■ Phone: (718) 522-0777

I am always happy to connect with you directly.