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To Whom It May Concern:

Thank you for the opportunity to comment on the updated staffing requirements that have been implemented as emergency rules beginning August 21. While I understand the importance of maintaining high-quality standards in early childhood education, I believe that some adjustments should be made before these rules become permanent. These changes will expand access to great candidates, provide fairness, and allow childcare centers to operate successfully without being at an unfair disadvantage compared to the Board of Education.

1. Expansion of Related Fields of Study

Currently, the definition of acceptable related fields of study is too narrow. For example, Lehman College—one of the most reputable institutions for education—does not offer a bachelor's degree specifically in Early Childhood Education (ECE). Instead, students are required to pursue degrees such as Sociology or Psychology, and then obtain either an extension in ECE or complete a master's degree in ECE.

As a result, many of the qualified hires hold bachelor's degrees in Sociology or Psychology with a minor in Early Childhood Education, but they do not qualify as a Head Teacher in a preschool classroom. This creates an unnecessary barrier and excludes strong candidates who have clearly prepared themselves to work in the field.

These individuals have also completed the necessary 12 credits in ECE through extensions, minors, or specialized coursework. When paired with ECE extensions, a minor in Early Childhood Education, or a concentration of related coursework totaling the 12 required credits, these degrees should be formally recognized as acceptable qualifications. Expanding the definition of related fields will not only align with the realities of higher education but also ensure fairness for candidates while increasing the pool of qualified staff available to centers.

2. Director Qualifications and Experience

The current director requirements create unnecessary barriers for many highly qualified leaders. Specifically, if a candidate has a bachelor's degree in education (or a related field) and over five years of experience in early childhood education, they should qualify to serve as a director.

Some of the best teachers and leaders I have seen are excluded from director roles simply because they lack a very specific certification. Meanwhile, the certified candidates who are eligible often prefer positions with the Board of Education because of shorter hours, more vacation time, and stronger benefits. This leaves childcare programs at a disadvantage, struggling to attract and retain directors.

To make matters worse, those certified teachers who are available often request salaries of \$90,000 or more — a number that is not realistic for many childcare centers to afford. This creates a situation where qualified, experienced individuals cannot serve as directors, while certified individuals remain inaccessible to the private childcare industry.

Certification should not be the only pathway to becoming a director. Experience, education, and proven leadership in the classroom should count toward director eligibility. Most states across the U.S. allow directors with much less restrictive requirements, and New York City should align with more balanced

and fair standards.

By creating these alternative pathways, New York City would expand the pool of qualified leaders, create fairness for staff who have worked hard to build their careers, and ensure stability for childcare programs that serve families every day.