

Early Childhood Council Waiver Request Application

Early Childhood Council Name: Denver's Early Childhood Council	Date: July 23, 2018
Primary Contact (Name and Position): Nicole Riehl, Sr Director of Programs & Development	Phone: 720-644-2562
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1. **Please cite the rule or regulation** (*Including rule/regulation number, and specific language of the rule/regulation creating the barrier*) **for Waiver Request:**

7.702.44 Qualifications for other staff members

A.1: An early childhood teacher, assigned responsibility for a single group of children and working under the supervision of a director, must be at least eighteen years of age and *must meet at least one of the following qualifications:*

- a) *A Bachelor's degree from a regionally accredited college or university with a major area of study in one of the following areas:*
 - 1) *Early childhood education;*
 - 2) *Elementary education;*
 - 3) *Special education;*
 - 4) *Family and child development;*
 - 5) *Child psychology.*
- b) *A Bachelor's degree from a regionally accredited college or university with a major area of study in any area other than those listed at Section 7.702.54, A, 1, and additional two (2) three-semester hour early childhood education college courses with one course being either introduction to early childhood education or guidance strategies.*
- c) *Current early childhood professional Credential Level III Version 3.0 as determined by the Colorado Department of Education.*
- d) *A 2-year college degree, sixty (60) semester hours, in early childhood education from a regionally accredited college or university, which must include at least two (2) three-semester hour courses, one of which must be either introduction to early childhood education or guidance strategies; and at least six (6) months (910 hours) of satisfactory experience.*

- e) *Completion of twelve (12) semester hours from a regionally accredited college or university, at either a two year, four year or graduate level, in each of the following subject or content areas in early childhood education and one of the three (3) semester hour courses must be either introduction to early childhood education or guidance strategies, plus nine (9) months (1,395 hours) of verified experience in the care and supervision of four (4) or more children less than six (6) years of age who are not related to the individual.*
- f) *Completion of a vocational or occupational education sequence in child growth and development plus twelve (12) months (1,820 hours) of verified experience in the care and supervision of four (4) or more children less than six (6) years of age who are not related to the individual.*
- g) *Current certification as a Child Development Associate (CDA) or other Department-approved credential.*
- h) *Completion of a course of training approved by the Department that includes training and work experience with children in a child growth and development program plus twelve (12) months (1,820 hours) of verified experience in the care and supervision of four (4) or more children less than six (6) years of age who are not related to the individual.*
- i) *Twenty-four (24) months (3,640 hours) of verified experience in the care and supervision of four (4) or more children less than six (6) years of age who are not related to the individual. Satisfactory experience includes being a licensee of a Colorado family child care home; a teacher's aide or teacher in a child care center, preschool, or elementary school, plus either:*
 - 1) *A current Colorado Level I credential; or,*
 - 2) *Two (2) three-semester hour early childhood education college courses from a regionally accredited college or university, at either a two-year, four year or graduate level, in each of the following subject or content areas with one course being either introduction to early childhood education or guidance strategies.*

2. Please list any statute or legislation associated with the rule/regulation cited above:
(Please note: state statutes cannot be waived.)

Title 26. Human Services Code, Article 1. Child Care Centers, Part 1. Child Care Licensing
 C.R.S. 26-6-106: Standards for facilities and agencies - rules

(2) Standards prescribed by such rules are restricted to:

(b) The character, suitability, and qualification of the applicant for a license and of other persons directly responsible for the care and welfare of children served, including whether an affiliate of the licensee has ever been the subject of a negative licensing action;

(d) The number of individuals or staff required to insure adequate supervision and care of children served

3. Reason for Request (IN DETAIL - Describe the barrier this Waiver addresses in implementing an early childhood project)

The early childhood workforce is in crisis. Despite significant evidence that early childhood caregivers are key to providing the emotionally supportive environments and language-rich interactions critical to positive early childhood outcomes and school readiness, limited business capacity, escalating rent/real estate costs, and flat-lining compensation stymie many child care programs and professionals. The increasing costs of housing and living expenses in the Denver area are making it more difficult for early childhood professionals to enter and stay in the profession, even as demand is projected to increase by more than 30% by 2025 according to the most recent Early Childhood Workforce 2020 plan. Furthermore, the recent Early Childhood Workforce Survey conducted by Early Milestones Colorado revealed seventy-three percent of directors indicate that it is difficult to fill teaching positions and that it takes an average of 2.7 months to fill an opening. As a result, 47% of directors indicate that they are forced to hire unqualified staff to keep classrooms open.

Central issue addressed:

Lack of qualified Early Childhood Teachers who represent the children, families, and communities they serve. For Denver's most vulnerable children and families, it is ever more important to offer high quality early learning experiences with skilled and knowledgeable teachers. The significant value of a qualified, culturally diverse and responsive workforce can build lasting positive child outcomes.

While child care licensing provides several pathways to earn ECT qualifications, the complexity and specificity of requirements outlined for ECT candidates, particularly for teachers of color, set up barriers for them to meet the qualifications in the more traditional ways outlined in these pathways.

Goal:

We are seeking to recruit and build a more diverse early childhood workforce that reflects the cultural, ethnic, and neighborhood values of the families and children they serve, while providing high quality instruction.

Key Strategies:

An accelerated ECT pathway provides wrap-around supports to ensure that candidates develop skills and knowledge aligned to the Colorado's Competencies for Early Childhood Educators and Administrators. Like the CDA qualification pathway, this model is a milestone-based pathway and ECT recognition is not granted until all requirements are met.

Licensed child care facilities across Denver are struggling to fill vacant Early Childhood Teacher (ECT) positions and cannot afford to hire and train new employees in anticipation of those individuals meeting ECT qualifications after 2 years. This proposal requests the approval of an Accelerated Early Childhood Teacher Career Pathway Program which will fall within the six-month coursework and experience timeline laid out for a new early childhood workforce program. If approved, the accelerated career pathway would enable workforce program participants to be ECT qualified after their first six months in the program and would also create the opportunity for high quality child care programs across Denver to more easily build their own career and training pipelines.

4. Please explain how waiving this rule/regulation is the only available method to implement the early childhood project:

With unprecedented and historically low unemployment in the Denver area combined with the rising cost of living and stalled compensation rates for early childhood professionals, new career pathways must be developed to meet the current need and growing demand within the field.

Child care programs often have applicants for job vacancies who have insufficient education and experience. Unfortunately, the economic pressures on child care programs prohibit their ability to hire those individuals and bear the burden of training them for up to 2 years until they are qualified. Additionally, programs are often faced with the difficult choice of hiring unqualified applicants, closing classrooms, or increasing staff/child ratios beyond what is desirable for quality when there is a lack of qualified candidates available.

The goal of this waiver is to provide a path to ECT qualifications that eases the financial burden on child care programs and keeps individuals engaged in the credentialing process, while still ensuring individuals who complete the path are competent professionals who are adequately prepared for their role as an ECT.

It is critical to support our field during this unprecedented workforce crisis, that we open new, innovative and flexible pathways to recruit and retain early childhood teachers. Denver's request seeks to do this while leveraging a variety of partners and funding streams to achieve this goal, including the Workforce Innovation & Opportunity Act (WIOA) funding with Denver Workforce Services.

5. How will Waiver Approval positively impact children, families, and/or your community?

Adequate staffing in the classroom is critical to supporting positive child outcomes and allows programs to provide quality staff/child ratios throughout the day. Lack of staffing is also impacting families as the availability of care in the community continues to decrease. By increasing staffing, children will receive more individualized attention and greater continuity of care while programs are able to meet the demand for care in Denver.

Job frustrations identified by early childhood teachers in the *Metropolitan Area Regional Findings of the Colorado Early Childhood Workforce Survey 2017* include staff turnover (33%), high ratios (25%), and instability in classroom assignments (19%). Unfilled positions have a negative impact on teachers, increasing overtime work and other stressors which contribute to burnout. Increasing teacher job satisfaction will impact the quality and continuity of care for children.

6. Please describe stakeholder outreach. Who are all the affected parties of this Waiver Request? (You may attach letters from affected parties)

For the first six months (pilot period), the child care programs partnering with Denver's Early Childhood Council on the new Early Childhood Workforce Initiative will be impacted and will have new workforce placements who will be under this waiver. This is expected to be approximately 25 individuals placed in approximately 15 to 18 child care programs within the first six months but does not limit the waiver to this number of participants. If this pilot program proves to be successful, eligibility to participate in this waiver would be expanded to all child care programs in Denver County rated at a Colorado Shines Level of 3 or higher who are in good standing with Child Care Licensing and can meet the other program requirements.

Child care centers and stakeholders from across the community have been involved in the conversations, planning and ultimate design for this waiver request. This includes a variety of licensed child care programs across Denver, ranging from small to large staff sizes, non-profit, for-profit, corporate, etc. Other partners, including those from state departments, local regulatory bodies, higher education, and funders have also been involved in this process.

7. Do you have any evidence to demonstrate that compliance with the specific rule creates a substantial undue burden? (If so, please attach)

Child care programs participating in the Accelerated Early Childhood Teacher Career Pathways Program are doing so on a voluntary basis and stand to realize significant cost savings in training and hiring new staff through the program.

8. If this rule/regulation is waived, how will you meet its intended purpose? (Ex: diversity of stakeholders, health and safety of children in care, etc.)

Participating individuals and child care programs agree to meet the following guidelines:

ELIGIBILITY

At the date of hire, licensed child care centers or preschool programs who meet the following criteria are eligible to participate in this waiver:

1. Hold a Child Care Center, or Preschool Program license from the Colorado Department of Human Services (CDHS).
2. Be in good standing with Child Care Licensing (not on probation).
3. Hold a Colorado Shines level 3 or higher rating.
4. Participate in a Quality Improvement Initiative with access to coaching from a credentialed Coach or be willing to contract coaching services through Denver's Early Childhood Council.
5. Agree to follow all requirements outlined in requirements below.

REQUIREMENTS

1. Staff person must have completed all pre-service and annual mandatory trainings as required by Child Care Licensing.
2. The staff person must be an approved, active participant in the accelerated early childhood teacher pathway program (list provided to Denver child care licensing by the Council, Council will notify with any changes within seven business days).
3. The employing child care program understands that staff person will not meet ECT qualifications until all aligned milestones have been achieved (listed in points 4-12 below). Until that time, staff person is subject to all licensing regulations and restrictions applicable to a teacher assistant role. Program is responsible for ensuring their staffing schedule accommodates these regulations.
4. Staff person will successfully complete two (2) three-semester hour early childhood education college courses from a regionally accredited college or university, at either a two-year, four year or graduate level, in each of the following subject or content areas with one course being either introduction to early childhood education or guidance strategies two early childhood college courses as outlined in child care licensing rules. The employing child care center or preschool will accommodate staff person's training needs as needed.
5. Staff person will complete 480 hours of documented work experience. Hours of experience may be documented for child care licensing through an affidavit process.

6. Director/Assistant Director at the employing child care program must complete the Denver Accelerated Early Childhood Teacher Pathway Documentation AND Documentation of Professional Development Supports forms, and keep both documents updated and available for child care licensing to review. These forms must be kept updated on a weekly basis.
7. The staff member must register in the Professional Development Information System (PDIS) and in collaboration with a supervisor, mentor teacher, and/or career navigator from Denver's Early Childhood Council, complete the Early Childhood Competencies Self-Assessment and develop a Professional Development (PD) Plan within the defined waiver period. The PD Plan will focus on detailed, attainable steps that show the path to becoming fully ECT qualified.
8. The employing child care program will commit to utilizing Quality Improvement or fee-based coaching resources to support the implementation of teaching best practices aligned to the PD plan and program Quality Improvement Plan. A minimum of 4 hours of documented coaching will be provided to the staff member by an external credentialed coach during the first 4 months of their employment. Documentation of coaching activities will be kept on the Documentation of Professional Development Meetings document and in the ecConnect database.
9. The employing child care program will be engaged in Colorado Shines QRIS by remaining on their rating schedule and maintaining a Level 3 or higher during their participation in the accelerated ECT pathway program. Should a program's level drop below a Level 3, the program will work in collaboration with a representative from Denver's Early Childhood Council to develop and implement a plan to address the needs such as a resubmission of documentation, if applicable. If the program is not eligible for resubmission, the plan will increase coaching visits, and/or utilize QI resources to re-submit for the Level 3-5 application within 9 months. If the program fails to meet these requirements, Denver's Early Childhood Council will notify child care licensing and a determination for continued participation in the Accelerated ECT Pathway Program will be made.
10. The employing child care program must hold an appropriate child care license in good standing, with no adverse action within the previous 12 months as of the date of this agreement. Program must maintain this status for the duration of the staff members' work placement.
11. Complete data requests when requested to support the Council's program planning and to analyze waiver effectiveness.
12. The employing child care program will provide mentor support and/or reflective supervision for the staff member totaling at least 4 hours over the first 4 months of employment, with at least one hour delivered each month.
13. Observations of staff member must be completed by supervisor a minimum of 4 times in the first 4 months of employment. All observations should be done using the Denver Accelerated Early Childhood Teacher Pathway Observation Tool and submitted upon Council request.

All supervisory, coaching, and mentor meetings shall be documented on the Documentation of Professional Development Supports form.

A variety of forms and materials have been created and submitted with this application to support this waiver process and include:

- Sample program agreement and coaching log
- Licensing documentation form
- Self-Assessment and PD Plan Documentation/Tracking
- Reflective Supervision Observation Tool

To ensure participants are prepared without over-taxing child care programs, a robust exit assessment process will be completed for each participant. Like the CDA observation and portfolio review, this exit assessment process will include a broad assessment of key early childhood competencies aligned to early childhood college coursework, coaching topics, and stakeholder feedback in addition to providing the feedback and resources participants need to continue in their professional career in early childhood. Aligning the experience and training requirements to this program will ensure an accessible, supportive, and sustainable career pathway for the community.

This exit assessment process mirrors the CDA exit process through building upon local systems and expertise. This exit assessment process would consist of the following culmination assessment for each participant:

- Completed PDIS Self-assessment and PD Plan signed-off by director and external credentialed coach
- Exit Observation Assessment conducted and signed-off by director, external credentialed coach, and participant that demonstrates satisfactory completion of all required competencies
- Information provided about Career Navigation for ongoing support

In the case where a participant does not pass the exit assessment process, they will need to complete 430 additional work experience hours (910 total) and 2 additional hours of coaching AND mentoring (6 total each) at the quality work placement site.

9. On what date would you like the Waiver to START?

Immediately

10. On what date would you like the Waiver to END?

3 years- 6 months for initial piloting, and an additional 2.5 years for full implementation and outcome tracking if the pilot phase is deemed successful

11. Is there a fiscal impact to implementing this Waiver? *(Please describe any anticipated financial impact)*

In addition to the fiscal impact on Denver's Early Childhood Council from monitoring (to be offset with public and private foundation funding), there is some anticipated fiscal impact will be on the child care programs. If college classes and additional training are a condition of employment, the cost of the education/training and the employee's time to attend trainings/classes will be supported according to the Department of Labor requirements. The child care programs participating in the new workforce initiative are aware of these implications and will maintain compliance.

12. How will you evaluate the effectiveness of this rule/regulation waiver if approved?

As the holder of this waiver, the Denver's Early Childhood Council is responsible for tracking waiver participation and outcomes. Child Care/Preschool Program will:

Share data with the Council, including but not limited to:

- # of participants in this waiver and completions
- ECT licensing option pursued
- Demographics of participants
- On-going employment status in annual surveys

13. Additional Comments:

SIGNED:

Emily Bustos

ECC Coordinator Name

Scott Burns

ECC Membership Chair Name

ECC Coordinator Signature

ECC Membership Chair Signature



Early Childhood Council Waiver Request

Recommendation from ECLC Waiver Review Subcommittee

Early Childhood Council Name: Denver Early Childhood Council	Waiver #: 18-02
CDHS Staff: Erin Frederiksen, Teresa Ribble, Kathi Wagoner	Date: 08/20/18
Recommendation to ECLC: Approve the waiver request	

1. Summarize Waiver discussion:

The waiver #18-02 was requested for approval to create an Accelerated Early Childhood Teacher Career Pathway Program. This waiver was requested in order to address the current workforce crisis and to create a streamlined and supportive pathway to Early Childhood Teacher (ECT) qualifications. The Denver Early Childhood council (DECC) is asking for a milestone based program in which participants would be ECT qualified after completing 480 hours of experience at a high quality facility, two ECE college courses, and passing a ECT Milestone Culmination Assessment (see below). During this time, the center would be reflective supervision and mentoring for the participants, in addition to external coaching from the DECC. For this initial pilot cohort of up-to 25 people, the participants made an agreement to continue employment for 18 months with the high quality work placement. However this may not be a condition for future application of this waiver.

The Waiver Review Subcommittee met on August 13 at 12:00pm and again on August 20, 2018 at 2:00pm. Representatives from Denver Early Childhood Council and Colorado Department of Human Services (CDHS) were present. Discussion took place among CDHS and DECC about specific concerns CDHS had around requirements for the Accelerated Early Childhood Teacher Career Pathway Program. One of these concerns was around required experience hours and participants leaving the high qualified work placement site after completing the pathway program. After much thoughtful work between both parties, they were able to come to agreement over requirements for the program.

2. Recommendation from ECLC Waiver Review Subcommittee:

ECLC Waiver Review Subcommittee recommends approval of the waiver request with the following conditions:

- Participants must complete 480 hours of work experience at high quality facility understanding that the minimal hours required for participation is 30 hours a week.
- Participants complete 2 ECE college course, one of which is ECE101, with a C or better
- Participants must complete 4 hours coaching from credentialed coach and 4 hours of supervision/mentoring from a mentor teacher or director.
- Completion of the ECT Milestones Culmination Assessment, which includes:
 1. Completion of PDIS Self-assessment and Professional Development Plan



- signed-off by the director and credentialed coach;
2. Exit Observation Assessment conducted and signed-off by director, credentialed coach, and participants that demonstrate satisfactory completion of all required competencies; and
 3. Information provided about Career Navigation for ongoing support.
- If these ECT Milestones Culmination Assessment criteria are not met, participants must complete additional 430 hours of work experience (910 hours total) and an additional 2 hours of coaching and 2 hours of mentoring totaling to 6 hours each at the high quality work placement site.

DECC shall provide a status update of the Accelerated Early Childhood Teacher Career Pathway Program after 6 months and 12 months.

The Waiver Review Subcommittee recommends approval of the waiver for 18 months, at which point DECC should provide an additional update on the waiver and the ECLC can determine whether it should be extended.

TO BE COMPLETED AT NEXT FULL ECLC MEETING

Date of ECLC Meeting: August 23, 2018
ECLC Waiver Decision and Conditions: Waiver #18-02 requested by Denver Early Childhood Council was approved unanimously for 18 months with statues updates at 6 months and 12 months.