

Received 2/17/22

Mary Myers Children's Center and Mary Myers' Daycare

4770 East US Hwy 64

Lexington, NC 27292

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To: Rulemaking Coordinator
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From: Mary Myers
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Date: 2.15.22

Re: Rulemaking Petition Proposal

Rulemaking Petition Proposal

Site Level Administrator Licensure and Credentials NCPK

10A NCAC 09 .3011 NC PRE-K SITE-LEVEL ADMINISTRATOR QUALIFICATIONS

NC Child Care Rule in the North Carolina Pre-Kindergarten (NC Pre-K) Program Requirements and Guidance Effective SFY 2021-2022

Page: 6-1 A. **Site Level Administrator Licensure and Credentials**

Keep rules (a) Administrator of NC Pre-K sites shall have:

- (1) A NC Principal's License or
- (2) A North Carolina Early Childhood Administrator Credential (NCECAC) Level III or
- (3) Hold a bachelor's degree in any field with 18 semester hours in early Childhood education and child development, and complete six semester hours in child care administration or nine semester hours in business administration or a combination of child care administration and business administration.
- (4) If the site level administrator does not meet subparagraphs (a)(1), (2), or (3) of this rule, the following shall apply:
 - (A) A provisional approval shall be given for four years from the time the site began participation with the NC Pre-K program for the administrator to attain an NC Principals license, or NCECAC III, or complete a Bachelor's Degree in any field with 18 semester hours in early childhood education and child development, and complete 6 hours in child care administration or nine semester hours in business administration or a combination of child care administration and business administration; and
 - (B) Progress toward this requirement shall be considered a minimum of six documented semester hours per year in early childhood education, child development, child care administration and business administration course work.

Or Propose to add: Option **(C) Existing Sites (established those that have been opened more than 4 years) may have a NCECAC II and 10 years experience or hold a NCECAC III or complete a Bachelor's Degree in any field with 18 semester hours in Early Childhood education and child development, and complete 6 semester hours in child care administration or nine semester hours in business administration or a combination of child care administration and business administration.**

10A NCAC 09 .3012 NC PRE-K TEACHER EDUCATION, LICENSURE AND CREDENTIALS

NC Child Care Rule in the North Carolina Pre-Kindergarten (NC Pre-K) Program Requirements and Guidance Effective SFY 2021-2022

Teacher Education, Licensure and Credentials

NC Child Care Rule Page 6-3 In NC Child Care Rule NC Pre-K above

Propose to ADD: Option 1: (8) or AAS degree in ECE and 5 years experience and working toward BK License.

Option 2: (8) or AAS degree in ECE and 5 years experience.

Rated License Education for Administrators

Rule: 10A NCAC 09 .2819

7 Point = Level III; and either 4 years of full-time verifiable early childhood experience in an early childhood center teaching young children; or 900 hours of verifiable time in a licensed child care program; or 1350 hours of verifiable time in an unlicensed school-age care or 4 years of child care administration experience; or 4 years of a combination of both types of experience; and camp setting; or BSAC training.

At the 7 point add or Level II and either 10 years of full-time verifiable early childhood experience in an early childhood center teaching young children; or 900 hours of verifiable time in a licensed child care program; or 1350 hours of verifiable time in an unlicensed school-age care or 4 years of child care administration experience; or 4 years of a combination of both types of experience; and camp setting; or BSAC training.

Rated License Education for Lead Teacher

Rule: 10A NCAC 09 .2820

At the 5 point level = All lead teachers; or All lead teachers at a Level I or higher; and 75 percent of the lead teachers shall have: (1) completed 9 semester hours in early childhood education or childhood development and have completed or are enrolled in 3 additional semester hours in early childhood education; and have 1 year of full-time verifiable early childhood work experience; or (2) have a Level IV or higher certification on the ECE scale and have 1 year of full-time verifiable early childhood work experience; or (3) Any combination of (1) and (2) of this requirement. Add or NCECC and 7 years experience.

At the 6 point level= All lead teachers; or All lead teachers at a Level I or higher; and 50 percent of the lead teachers shall have either: (1) An A.A.S. degree in early childhood education or child development or an A.A.S. degree in any major with 12 semester hours in early childhood education or child development and 1 year of fulltime verifiable early childhood work experience; or (2) Completed 60 semester hours towards a BA/BS degree program with 12 semester hours in early childhood education and 1 year of fulltime verifiable early childhood work experience; or (3) A Level VI certification on the ECE scale and 1 year of fulltime verifiable early childhood work experience; or (4) Any combination of (1), (2) and (3) of this requirement. Add or NCECC and 10 years experience.

At the 7 point level= All lead teachers; or All lead teachers at a Level I or higher; and 75 percent of the lead teachers shall have either: (1) An A.A.S. degree in early childhood education or child development or an A.A.S. degree in any major with 12 semester hours in early childhood education or child development and 2 years of full-time verifiable early childhood work experience; or (2) A Level VI certification on the ECE scale and 2 years of fulltime verifiable early childhood work experience; or (3) Any combination of (1) and (2) of this requirement. Change to: or level I or higher certification on ECE scale and 50% have AAS in ECE (or AAS with 12 hrs ECE) and 2 years experience or have a level VI or higher on the ECE scale and 2 years experience or 12 years experience.

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I am Mary Myers and I have been in the Early Childhood and Education field since 1970. I earned AAS degree in 2010. I started out in my licensed childcare with 23 children and now own two businesses; currently Mary Myers Children's Center and Mary Myers Day Care. Within my 50 years; I have owned up to 5 child care centers. The reason for this proposal is that I have noticed over the years especially during the global pandemic; the child care business is volatile and we are in unprecedented times; Administrators are finding it extremely hard to meet the education requirements put forth by the legislators. In my proposal; I am asking for experience to be added as an option.

I have spoken to others directors in my community; we all could lose/close our centers if these rules are not adapted to fit during these difficult times. The cost of paying staff with the higher education is not attainable for the owners of the child care facilities.

In my experience; I have hired teachers with BS/BA degrees; but they do not know how to build relationships with the children, they may be great at making lesson plans but they do not know how to apply it in the classroom. Within the BS/BA degree they do not always get the hands-on experience in the classroom with the children and this makes it very hard for the teachers to deal with children with special needs or children with challenging behaviors.

I would almost guarantee if you created a poll to ask Administrators what is the one thing that is their biggest challenge and it would be finding educated teachers and paying them at the rate of the school system; it is just not feasible for Early Education Facilities to do this. I am fighting for these changes because I feel it is in the best interest of Early Childhood programs across the state and the School systems. Thank you for your consideration.

“There just aren't enough teachers. There isn't a big pool to pull from. Retirements are through the roof and people are leaving the profession even more than they were due to all the havoc from Covid,” Prijatelj told NBC News. “It's dire.” NBC NEWS.COM

Sincerely,
Mary Myers