May 6, 2019

Ms. Simone C. Hawkins  
Assistant Commissioner  
Bureau of Child Care  
NYC Department of Health & Mental Hygiene  
125 Worth Street  
New York, NY 10013

RE: Master’s in Early Childhood Education as a “Related Field” under Article 47.13(d)

Dear Assistant Commissioner Hawkins:

The discussion below outlines the Day Care Council of New York’s (DCCNY) request that the Department of Health and Mental Hygiene (DOHMH) consider a Master’s in Early Childhood Education (ECE) to be a “related field” for purposes of Group Teacher qualifications under Article 47.13(d) (1)-(2). Under the regulations, DOHMH has the discretion to recognize a course of study in a “related field”.

Requirements of Article 47.13(d) (1)-(2)

In two instances, an individual is considered a qualified Group Teacher in a child care program regulated by Article 47 if that person has, among other things, a Bachelor’s degree in Early Childhood Education or a related field of study approved by DOHMH. See Article 47.13(d) (1)-(2) (emphasis added). Notably, Article 47 does not define what a “related field” is and instead leaves it to DOHMH’s discretion to make a determination.

Comparing Core ECE Coursework

While a Bachelor’s degree can be the most direct path to meeting the educational requirements of Article 47.13(d), it is possible a Group Teacher obtained a Bachelor’s degree in a different field of study but later pursued a graduate degree in Early Childhood Education. In such instances that person has made a concentrated effort to gain the necessary knowledge and it is appropriate to consider the person on an equal or better educational footing to someone with a Bachelor’s degree in the same field.
Below are examples comparing the Early Childhood Education courses required by the Bachelor’s versus Master’s programs of several New York City colleges:

<table>
<thead>
<tr>
<th>Institution</th>
<th>Bachelor’s Level ECE Requirements</th>
<th>Master’s Level ECE Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>City College (CUNY)</td>
<td>34 credits</td>
<td>40 – 49 credits</td>
</tr>
<tr>
<td>Brooklyn College (CUNY)</td>
<td>33 credits</td>
<td>45 credits</td>
</tr>
<tr>
<td>Touro College</td>
<td>45 credits</td>
<td>36 credits</td>
</tr>
<tr>
<td>Hunter College</td>
<td>42 credits</td>
<td>36 – 42 credits</td>
</tr>
</tbody>
</table>

As the sample demonstrates, the focused course requirements in Early Childhood Education are approximately the same at the Master’s level. Given the extra level of time and costs necessary to obtain a graduate degree, these individuals should be recognized as having the necessary education in a “related field”.

**Conclusion**

On behalf of its members and other child care providers, DCCNY requests that DOHMH recognize a Master’s in Early Childhood Education as a “related field” under Article 47.13(d) (1)-(2).

Thank you for your consideration.

Sincerely,

Andrea Anthony  
Executive Director