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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:

<u>Institution</u>	<u>Bachelor's Level ECE Requirements</u>	<u>Master's Level ECE Requirements</u>
City College (CUNY)	34 credits	40 – 49 credits
Brooklyn College (CUNY)	33 credits	45 credits
Touro College	45 credits	36 credits
Hunter College	42 credits	36 – 42 credits

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