**Public Comment TWC State Plan**

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Camp Fire First Texas concurs with what we know so many others in the state believe: this is an
opportune time to create a child care system that works so that Texans can work.

We agree that TWC should maximize the CCDBG dollars to stabilize the industry, build and support a supply of sustainable high quality programs, use existing elements to develop a comprehensive data system, focus on parent engagement and education, align agencies and programs, and address critical workforce issues. Specifically, I would like to address Section 6—The recruitment and retention of a qualified and effective child care workforce with attention to §1.1.1: *describe how the framework improves the* ***quality, diversity, stability, and retention of caregivers, teachers, and directors***(98.44(a)(7)).

Camp Fire First Texas has provided professional development toward early education certificates and certifications for over 25 years. In addition, we are the sponsor of the first registered early education apprenticeship program in the State of Texas. Apprenticeship is a workforce and economic development strategy to build supply for a quality early childhood teacher shortage—while simultaneously improving childcare quality and supporting a strong economy.

Encouraged by non-partisan advocacy organizations like the Bipartisan Policy Center and Center for American Progress, we believe that registered apprenticeships, as part of an educational and career pathway, are a compelling option for states to support their early childhood workforce. Registered apprenticeship programs combine classroom instruction, on-the-job learning, and mentorship to create a holistic, earn-while-you-learn approach.

Strengthening the State Plan in terms of apprenticeship opportunities builds on what the TWC has already done to increase the effectiveness of the early education workforce. We commend much of what TWC has done in this effort including building up Texas Rising Star as our state’s Quality Rating and Improvement System, supporting Texas Early Childhood Professional Education System to land data and support career pathway planning, and funding educational scholarships through TXAEYC and T.E.A.C.H. early childhood Texas. TWC has the opportunity to create a strategic plan that takes advantage of the timely interest and support of quality child care and education. Our recommendations include:

Career Pathway: Apprenticeship

* **Expand scholarship funds to include apprenticeships.** We appreciate support for professional development for the Child Development Associate credential (CDA). The Early Educator certificate from the Department of Labor is a quality stand-alone, yet stackable, conduit between the CDA and degree programs. We recommend including apprenticeship in scholarship opportunities from TWC
* **Explore a coordinated state-wide early education apprenticeship model** to ensure consistent alignment with state and national quality standards, and the seven essential elements of quality professional development systems recommended by The Center for American Progress:
1. Has credentials with labor market value
2. Has stackable credentials
3. Has portable credentials
4. Is accessible
5. Extends beyond traditional coursework
6. Provides credit for prior learning (on the job credit)
7. Includes measures for quality assurance

Career Pathway: Articulation

* **Update the Articulation Toolkit.** This was created by the Children’s Learning Institute and, while valuable, was last updated in 2017. We recommend updating this to include apprenticeship programs and prior learning assessments linking quality professional development to college credit.