

National Association for the Education of Young Children

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July 21, 2014

Standard Occupational Classification Policy Committee
U.S. Bureau of Labor Statistics
Suite 2135
2 Massachusetts Avenue, NE
Washington, DC 20212

Subject: 2018 SOC (Standard Occupational Classification)

Dear Policy Committee:

The National Association for the Education of Young Children (NAEYC) is the nation's largest association of early childhood education professionals working with and on behalf of children from birth through age 8. We are pleased to submit comments on the revisions to the Standard Occupational Classification (SOC) and to the coding guidelines.

NAEYC supports the direction of the recommendations in the White Paper by the Workgroup on the Early Childhood Workforce and Professional Development¹ which draw on the 2012 reports of the Institute of Medicine and National Research Council on the early care and education workforce, and the U.S. Government Accountability Office report (GAO-12-248) on workforce data and quality improvement.

The data on the early childhood education workforce is difficult to obtain, and made more difficult when the definitions of the different occupations within the profession are not reflective of the work being performed. Thus, it is difficult to obtain accurate statistical data about the vital types of work in the field of early childhood education. A primary outcome of the revisions to the SOC should be to change classifications, titles, and definitions to reflect with accuracy the work of early childhood education rather than distinguishing occupations based on the setting of the work.

Highlighted points:

Both care and education are necessary, integrated components of high-quality early childhood education and the SOC should not perpetuate a false dichotomy of care versus education with young children. A quality program with young children must do both: nurture children, ensure their health and safety, provide room for choices and self-direction *and* provide instruction and opportunities for content learning. Caregivers are teachers and teachers are caregivers.

¹ Proposed Revisions to the Definitions for the Early Childhood Workforce in the Standard Occupational Classification. White Paper Commissioned by the Administration for Children and Families, U.S. Department of Health and Human Services, Prepared by the Workgroup on the Early Childhood Workforce and Professional Development under contract through the Child Care and Early Education Policy and Research Analysis, 2005-2018. June 18, 2014 at <http://www.acf.hhs.gov/programs/occ/news/acf-submits-comments-on-revision-of-standard-occupational-classification>

Currently, "Childcare Worker" is part of the SOC major group for Personal Care and Service Occupations, along with locker room attendants, barbers, baggage porters and animal trainers. The current occupation "Preschool Teacher, Except Special Education" is 25-2011 in SOC major group Education, Training, and Library Occupations, which also includes Special Education Teachers at Preschool and Kindergarten Teacher, Except Special Education. The definition for Preschool Teacher, Except Special Education is "instruct preschool-aged children in activities designed to promote social, physical, and intellectual growth needed for primary school in preschool, day care center, or other child development facility." These activities also occur in child care settings. Thus, we recommend, as does the White Paper, that "Childcare Worker" be moved to the Education major group. If an early childhood provider only provides care, then they perform a personal and not an educational service. Also, this would create a good parallel with Management Occupations, Education Administrators, Preschool and Childcare Center/Program which does not distinguish preschool from child care settings but focuses on the nature of the work.

The occupation classification and definitions should take into account different occupational roles and responsibilities. We believe the proposals to make those distinctions in the White Paper are appropriate.

Lastly, improvements in the SOC would be a step in the right direction, yet other information is necessary to define and advance early childhood education professionals based on credentials and other professional recognition.

Sincerely,

A handwritten signature in black ink that reads "Rhian Evans Allvin". The signature is written in a cursive, flowing style.

Rhian Evans Allvin
Executive Director