



building an afterschool workforce

Regulations and Beyond

by Patricia Cole

In the space of an afternoon, an afterschool worker may perform many roles—homework tutor, mentor, athletic director, games master, role model, reading coach, top chef, bridge to parents, and, above all, an adult who develops positive relationships that can change children's lives. Program staff is a critical ingredient of the quality of afterschool programs, which are increasingly seen as means to support youth development and school success. But what qualifications—education, training, and experience—should staff members possess?

Building the workforce to help children and youth in afterschool programs reach their potential is a task that the field itself should undertake, together with the policymakers who regulate, fund, and oversee programs. With the reauthorizations of both the Elementary and Secondary Education Act and the Child Care and Development Block Grant long overdue, the role of af-

terschool in achieving national education goals by supporting the development of well-rounded children and youth must come into sharper focus.

The National AfterSchool Association, under the auspices of an Edmund A. Stanley Research Grant from the Robert Bowne Foundation, developed a baseline look at how states are approaching staff qualifications and training in two federal funding streams for afterschool programs:

- Child Care Development Fund (CCDF), the umbrella term for all federal childcare funding, discretionary and mandatory, governed by the provisions of the Child Care and Development Block Grant
- 21st Century Community Learning Centers (21st CCLC)

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The study looked at states' basic floors for qualifications and professional development for staff in center-based afterschool programs. It also examined approaches to improving quality.

These two funding streams have different perspectives on shaping program characteristics. CCDF subsidizes children in programs where the basic *inputs* are regulated for licensing purposes. 21st CCLC, on the other hand, stems from an education perspective that stresses *outputs*. It funds grantees for the specific purpose of improving academic success, particularly among children from low-income families, while providing enriching activities. With funding of \$1.1 billion, 21st CCLC is the major federal program devoted solely to afterschool; it plays a significant role in providing afterschool opportunities for low-income children and youth. Unlike a program such as Head Start, 21st CCLC does not come with an extensive internal regulatory framework. However, programs and states may have to respond to requirements from other sources.

If afterschool is to become a *system* at the program level and a *profession* at the staff level, the field needs to examine requirements resulting from differing perspectives as well as the cohesive approaches to afterschool regulation in some states. Afterschool practitioners, agency officials, advocates, and other stakeholders around the country are working to identify the competencies program staff need and creating systems to support their professional growth. Understanding the requirements of different oversight sources, the perspectives that can divide them, and the common mission that connects them may forge a path toward accomplishing those tasks.

Methodology

The study examined regulations and, as needed, state statutes related to staff in center-based childcare programs serving school-age children in all 50 states plus the District of Columbia. State childcare regulations were accessed through the National Resource Center for Health and Safety in Child Care and Early Education (2009) online database. A data collection instrument (DCI) for each state was used to gather information about how that state's regulations addressed qualifications and professional development requirements for afterschool staff. In a few cases, state statutes and other state guidance, avail-

able online through the state childcare administering agency, were consulted for further clarity. Tables with information from all states were developed for specific characteristics, such as qualifications required of program directors. These tables formed the basis for more detailed analysis.

Information also was obtained via web-based searches on state quality rating and improvement systems and professional development systems, as well as from state CCDF plans available from the U.S. Department of Health and Human Services (2010). While every effort was made to ensure accurate interpretation of regulations and statutes, every state's structure differs, making following and crosschecking regulations difficult.

The study also examined information on 21st CCLC programs in 42 states and the District of Columbia. Most frequently the information was contained in requests for applications, which outline the requirements for receiving grants. Other documents examined included additional program guidance, evaluations, and annual reports. Documents were obtained primarily through web-based searches supplemented, in some cases, by information

requests to the state administering agency and limited follow-up with state program officials. Information from these sources was added to each state's DCI and analyzed by constructing tables that included information from all states where data were available.

Childcare Regulatory Framework

In many afterschool programs, state childcare licensing rules and regulations shape staff qualifications and training. Regulations generally set minimum qualifications for various positions, as well as requirements for pre-service training and ongoing professional development through in-service training. While regulations set a floor, other frameworks for improvement in states help raise the level of quality. These different approaches to quality have the potential to interact; providers and regulators could create a partnership toward building an infrastructure that would define and ultimately raise the quality of afterschool staffing.

All states regulate at least some types of childcare providers serving children up to age 12, and some include older children as well. Childcare funded through the federal CCDF program is administered in this context.

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Table 1. States Defining Director and Frontline Staff

| POSITION | NO. OF STATES USING THIS POSITION | BACHELOR'S DEGREE OR HIGHER | ASSOCIATE DEGREE | CREDENTIAL OR CERTIFICATE | NON-DEGREE EDUCATION, TRAINING, AND EXPERIENCE |
|----------------------------|-----------------------------------|-----------------------------|------------------|---------------------------|--|
| Program Director | 50 | 41 | 32 | 37 | 40 |
| Head Teacher/ Group Leader | 22 | 9 | 8 | 7 | 17 |
| Teacher/ Caregiver | 39 | 5 | 5 | 10 | 37 |

Table 2. Educational Content for Program Directors

| TYPE OF CONTENT | NUMBER OF STATES DEFINING TYPE OF CONTENT | | | |
|---|---|------------------|---------------------------|--|
| | Bachelor's Degree or Higher | Associate Degree | Credential or Certificate | Non-Degree Education, Training, and Experience |
| Related to Child Development | 28 | 28 | 37 | 27 |
| Related to School-Age Children | 21 | 8 | 4 | 8 |
| Not Related to Child Development | 20 | 8 | 0 | 1 |
| No Education Requirement –Experience Only | N/A | N/A | N/A | 10 |

However, childcare regulations in many states do not cover all afterschool programs. Often programs serving children older than age 12 and those operated by school districts or national youth organizations are exempt from regulation. Providers, students, and parents are left with a patchwork of oversight and, in many cases, little regulation at all.

Staff Qualifications

Our study found that at least 23 states had distinct requirements for school-age program staff. Another 10 had staff-related provisions embedded in or in addition to their basic personnel requirements. However, even states that do not have separate regulations for school-age programs may

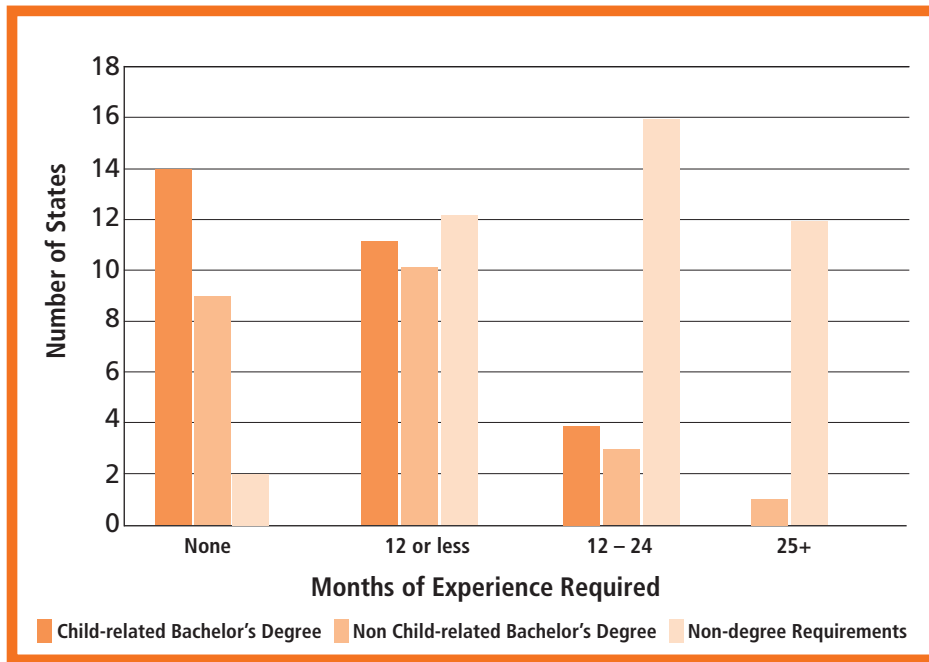
nevertheless recognize the distinct needs of school-age staffing.

Qualifications defined in regulations are a *floor*, so they by no means describe every person holding a particular position in a particular state. Many after-school staff members have qualifications well beyond the minimum required. Still, regulatory requirements provide insights about how their framers view certain positions: might a college degree be desirable for a specific position, or is a minimal amount of education enough?

Requirements for childcare qualifications are a system of *equivalencies*: combinations of education, credentials, training, and experience considered to equally qualify an individual for a position. Often the requirements of one state cannot easily be compared to those of another state because of the large number of possible permutations. In this study, qualifications were divided into four categories: bachelor's degrees or higher, associate degrees, credentials or certificates, and education and training that did not require a degree. Experience required was noted in all categories.

The study focused on minimum qualifications for two levels of positions: program director and frontline staff. The latter category includes both head teachers (sometimes called group leaders) and teachers or caregivers. All states define a director or administrator position for the person who oversees and plans the program. Most, but not all, states define qualifications for

Figure 1. Program Director Qualification Requirements by Education vs. Years of Experience



at least one level of frontline staff who work directly with children. (See Table 1, page 14.)

As would be expected, the most stringent and extensively described qualifications were for *program directors*. Of the four categories, education and experience are the key qualifications. Table 2 (page 14) summarizes the requirements for program directors in terms of educational content. Generally, states required educational content to be related to child development, although bachelor's degrees outside a child-related field were allowed in many states. Twenty-one states included majors relevant to working specifically with school-age children, such as elementary education or youth development. The non-degree category required some combination of college credit, clock hours of training, and experience. About half of the

states required a combination of college credit or other training with experience in a child-related field. In general, the further a program director's education moves from a bachelor's degree in a child development field, the more experience that candidate needs, as Figure 1 shows.

Frontline staff, because they work most closely with children day in and day out, are the ones who form the relationships that are all-important in determining the quality of children's afterschool experiences. Our study found

that requirements for frontline positions generally did not include academic degrees. Although a few states defined qualifications that included significant academic coursework, fifteen states required only minimal qualifications for caregiver or teacher positions, and only five of these defined a supervisory position between program director and teacher that might supply more expertise in interacting with children. The qualifications generally consisted of a minimum age (usually 18), a high school diploma or equivalent, and perhaps a few months of experience.

The minimal qualifications required for frontline staff in many states doubtless reflect the reality of factors such as low compensation and the part-time nature of many afterschool jobs. These factors make attracting highly trained staff difficult. Yet until the skills needed for the job are defined and their importance emphasized, addressing these factors will be difficult.

Table 3. Timeframes for Completing Pre-service Requirements

| TIMEFRAME FOR COMPLETING INITIAL REQUIREMENT | NUMBER OF STATES |
|---|------------------|
| Prior to employment or within one month of employment | 26 |
| Within 6 months of employment | 7 |
| Within 1 year of employment | 2 |
| Timeframe not specified | 6 |
| No information found | 10 |

Pre-Service and In-Service Training

Our study determined that regulations in most states recognized the need for job-related training, requiring some type of pre-service or orientation training as well as ongoing professional development.

Though most states had pre-service requirements, many did not specify the number of hours or did not require training to be completed prior to employment. In a few states, pre-service training entailed several steps. Table 3 summarizes the timeframes in which states required pre-service training to be completed. Pre-service

Table 4. Hours of In-service Training for Frontline Staff

| RANGE OF HOURS REQUIRED | NUMBER OF STATES |
|--|------------------|
| 10 or less | 18 |
| 11–15 | 23 |
| 16–20 | 6 |
| 20+ | 3 |
| Calculated as percentage of hours worked | 2 |
| Adjusted for part-time work | 6 |

requirements tended to emphasize health and safety issues and emergency procedures. Other topics included policies and procedures, guidance and discipline, and child development.

Almost every state required program staff to participate in annual in-service training to upgrade or maintain their skills and knowledge. As Table 4 shows, most states required 15 hours or less of annual training for teachers or caregivers. In-service training typically covered such areas as child growth and development, health and safety, parent involvement and communication, activity and lesson planning, professionalism, and interactions with children. Several states included topics related to school-age children or required that training pertain to the age group with which the practitioner works.

Only a few states required professional development plans for all staff. Such plans chart a course for individual staff members and help to ensure that training is helping them meet professional goals. A handful of states required training opportunities to be approved through formal state training registries. Other states were grappling with such basic issues as how many of the required training hours could be provided through self-study.

The minimal qualifications required of frontline staff in many states make pre-service and in-service training critical to ensure that staff members have the skills and knowledge necessary to work with children and youth. However, a great deal of the training states required seemed not to be directed at clear professional development goals such as degrees or credentials. States could revise their training requirements in order to ensure basic competencies as well as to help all staff move upward in the profession by setting and reaching professional development milestones.

Other Means of Quality Improvement

Increasingly states are looking at ways to improve the quality of early care and education through systematic methods that often are outside, but may intersect with, the regulatory system.

Quality rating and improvement systems (QRIS) encourage better program quality by establishing tiers of quality with increasingly high standards. At least 19 states had statewide QRIS for childcare programs, with more states designing or piloting them. These QRIS did not always include afterschool programs, but at least 12 states had embedded provisions for school-age children in their overall requirements, and four had separate school-age tracks (Afterschool Investments Project, 2010). Licensing requirements set by regulations often were incorporated into QRIS as the first level of quality. QRIS typically addressed staffing issues by requiring that a certain percentage of staff attain a certain level of qualification for a program to advance to a higher quality tier.

Competencies and credentials that address the basic skills and knowledge for practitioners are an important step in developing and recognizing qualified staff in a still-emerging field such as afterschool. Considering the minimal qualifications required for frontline staff in many states, establishing a set of competencies that ensures a basic level of knowledge would be an important strategy for improving afterschool quality. Our study identified a few states, including North Carolina and Tennessee, that incorporated their core competencies into training requirements. Sixteen states have developed school-age credentials to recognize the attainment of knowledge and competencies for delivering afterschool services (U.S. Department of Health and Human Services, 2010).

Professional development systems or registries are quality improvement systems for individual staff. These systems offer articulated frameworks for achieving levels of competencies and advancing in the profession; they also provide quality assurance and outreach to bring practitioners into the system. At the time of this study, 10 states and the District of Columbia had developed such systems for the afterschool workforce (Afterschool Investments Project, n.d.). Professional development systems provide avenues for staff to create personal training programs and goals. A few states have integrated professional development systems into regulations by requiring training to be approved by the state registry and incorporating credentials into qualification frameworks.

Cost can be a barrier to improving program quality, particularly when it comes to staff qualifications and training. If individuals have to pay for training, low pay

Table 5. Developing a Quality Workforce: Examples of Interplay Among Systems

| PROFESSIONAL DEVELOPMENT SYSTEM | REGULATORY/LICENSING FRAMEWORK | QUALITY RATING AND IMPROVEMENT SYSTEM |
|---|--|--|
| Defines career lattices and levels of qualifications | Ties requirements to qualify for positions to professional development systems | Requires proportion of staff to be at certain levels in the lattice to move to a higher tier |
| Establishes core competencies | Requires training to relate to achieving core competencies | Requires proportion of staff to achieve core competencies for each tier |
| Develops school-age credentials; creates higher education curricula and degrees | Recognizes afterschool credentials and degrees in qualification requirements | Relates staff qualifications to movement among tiers; provides assistance in achieving goals |
| Approves training courses and trainers | Requires training to be from approved list of trainers | Requires training to be from approved list of trainers |

and the part-time nature of many afterschool jobs may be barriers to higher credentials or degrees. The success of such initiatives may depend on higher reimbursement rates for programs as well as bonuses, stipends, and scholarships for staff. These resources can come from special funds or programs such as the T.E.A.C.H. Early Childhood project, which in some states includes afterschool workers (Afterschool Investments Project, 2007).

Enhancing the Intersection of Regulation and Quality Improvement

Promoting interrelationship between quality improvement mechanisms and regulatory frameworks could help ensure more widespread increases in the level of staff qualifications and more purposeful requirements for mandatory training hours. Table 5 illustrates how such interactions among professional development, regulatory, and quality improvement systems could improve quality.

21st Century Community Learning Centers

As the largest federal program devoted specifically to afterschool services, 21st CCLC is of great significance in providing enriching experiences and academic assistance primarily to low-income students. This significance warrants attention to the requirements affecting local program staff. Because there are no federal performance standards for the program, states can set their own requirements, generally through their Requests for Applications (RFAs, known by various names in different states). Depending on the state and local grantee, 21st

CCLC programs may also be affected by regulations such as federal requirements for paraprofessionals in Title I of the Elementary and Secondary Education Act, state childcare regulations, or state department of education requirements. Because RFAs do not always address such external requirements, a complete picture is difficult to piece together. Consequently, our study could not use 21st CCLC guidance to explore other sources of state regulation for afterschool programming.

About a third of the RFAs examined in our study set out some requirements for staff qualifications. Often these requirements were related to specific roles, such as director and staff who provide academic services; these were usually required to be certified teachers. More than half of the RFAs either did not address personnel-related requirements or simply required programs to describe their staffing plans. An examination of the guidance documents suggests that states generally patterned their RFAs on the informal federal guidance from the period when funds flowed from the federal level directly to local grantees. This guidance did not address staff qualifications; the implicit assumption was that most staff would be certified teachers. Reports on program characteristics on a national basis and for individual states show that many staff, although by no means all, do have that qualification (Billman & Smith, 2008; Faris, Hilgeman, Huang, & Zoblotsky, 2008; Jurich & Frye, 2009; Naftzger, et al., 2007; Naftzger, Kaufman, Margolin, & Ali, 2006).

The treatment of staff qualification requirements in the 21st CCLC program creates something of a paradox. On the one hand, 21st CCLC's nature as a grant

whose recipients are judged on *outcomes* may mean less emphasis on requiring specific *inputs* such as staff characteristics. The childcare regulatory framework, which applies to many programs that do not receive public funds, must focus more on the inputs that programs need to provide services at a basic level of quality. On the other hand, where 21st CCLC programs do set requirements, they can actually be more exacting. For example, in the handful of states where our study could compare requirements for similar positions across settings, the 21st CCLC programs were likely to set a specific requirement, such as being a certified teacher. In contrast, childcare regulations might define several possible combinations of education, training, and experience.

In contrast to the consideration of staff qualifications, state guidance in RFAs routinely discussed professional development. This practice again mirrors the federal guidance, which clearly suggests that even staff who are certified teachers may need additional training in working with children and approaching learning in an afterschool setting. The U. S. Department of Education's non-regulatory guidance (2003) notes, "Staff training should focus on how to work with children, how to negotiate, and how to address the needs of children of different ages, races, and cultures, and children with disabilities." Training also should cover "strategies for implementing the different program components of academics, enrichment, and recreation" (U. S. Department of Education, 2003, p. 14). Our study found that state guidance routinely required programs to develop and maintain professional development plans.

One reason the program guidance explicitly addressed professional development is that the federal statute designates funding for training and technical assistance, up to 3 percent of federal allocations. Training dollars are provided for each program, creating an important distinction between 21st CCLC programs and other afterschool programs. While other programs may benefit from training support funded through the quality improvement portion of CCDF or other programs that have training and technical assistance money, these

funds do not automatically attach to individual programs as they do in the 21st CCLC legislation.

Moving toward a Comprehensive Staff Quality System

While afterschool programs funded by different sources may emphasize different components, clearly there is a commonality of basic activities, staffing, and structure that could be the basis of a cohesive approach to afterschool quality in the states. A few states are working to develop an approach to afterschool regulation that takes steps toward a more cohesive system.

Michigan requires all programs serving children up to age 12 to be licensed as childcare centers, regardless of whether they are operated by public schools. 21st CCLC projects exclusively serving children older than 12 must meet the minimum requirements of licensing and follow the *Model Standards for Out-of-School Time/After-School Programs in Michigan* (Michigan State Board of Education, 2008).

New Jersey recognizes the importance of standards and congruent guidelines across programs. Childcare regulations exempt school-operated programs from licensing, but the state's 21st CCLC RFA advises local education agencies applying for grants to use the regulations for childcare centers as a guide for best practices. Community-based grantees must be licensed and adhere to the manual, as must the state public-private partnership for afterschool programs, *New Jersey After 3*.

In *Maine*, a legislatively commissioned Afterschool Work Group reported on the patchwork of oversight of afterschool programs. The work group recommended developing licensing rules for afterschool programs, including those for children over age 12. It also recommended covering school-administered programs either through childcare licensing or by having the Maine Department of Education develop quality standards that mirror the licensing standards (Afterschool Work Group, 2008).

The task of creating a comprehensive approach through standards that encompass a range of programs is complex. School-based programs are often reluctant to come under licensing requirements overseen by non-

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education agencies. Little information is available about how state or local departments of education provide oversight for afterschool programs. It is sometimes difficult to reconcile differing perspectives on what afterschool is and therefore what type of staff afterschool programs need. Left out altogether in many states are programs for older youth, because childcare regulations end at age 13.

Yet 21st CCLC programs already are subject to differing requirements in different states. As programs become self-sustaining, they may find themselves navigating a different world from when their grants provided for training and technical assistance. They may need to vie for participants and give parents some assurance of quality services. North Carolina, which exempts school-operated programs from licensing, finds such programs voluntarily participating in its quality star licensing system for marketing purposes. A comprehensive approach to afterschool may become more desirable if it includes a system of quality assurance and improvement accessible to all programs, allowing programs to work together across settings to raise the quality floor—and allowing parents to make sense of the tangle of afterschool programs in their communities.

Recommendations

Creating a picture of states' expectations for afterschool staff is akin to assembling a complex jigsaw puzzle whose pieces are different sizes and shapes—or are missing altogether. Trying to assemble the puzzle reveals the state of the afterschool field as it strives to become a *system* at the program level and a *profession* at the staff level. Some states have put some of the pieces together; others have started to sort them out. In still others, the pieces seem to be in different boxes. While most states do not seem to be thinking of an overall framework of requirements across program settings and funding streams, a few states have moved toward creating connections among different afterschool settings and aligning their requirements.

Even without a complete picture, some insights emerge. State childcare regulations can be used in concert with other quality improvement approaches to help create a professionalized workforce. In fact, most of the

work to build afterschool systems and improve professional development has been underwritten by CCDF quality funds. However, sometimes afterschool is overlooked in writing early childhood regulations or creating quality improvement systems. Both kinds of system should include afterschool to ensure appropriate qualifications for afterschool practitioners.

Though staff qualifications for the largest source of school-based afterschool programming are often not delineated, the 21st CCLC program could be an important partner in building a larger afterschool system, particularly because it has training money to support the programs it funds. Being encompassed by a larger system also could create smoother transitions once programs' 21st CCLC grants have ended.

A high priority should be placed at all policy levels on developing a comprehensive view of how we support children and youth during their out-of-school hours and how we value the skills of the adults who provide that support.

States have the largest role—as well as a great stake—in developing a system of high-quality afterschool programs staffed by qualified personnel. States need to:

- Move toward consistent and coordinated regulation of afterschool programming for all ages of children and youth, as well as support for quality improvement across programs.
- Ensure that regulations governing childcare licensing, as well as professional development and quality improvement systems, include provisions or components specifically directed to afterschool programs.
- Increase qualification and training requirements to reflect best practices in afterschool staffing and to ensure that training hours work toward meaningful professional goals.
- Integrate quality and staff improvement systems into regulations by, for example, incorporating professional development lattices as well as afterschool-specific credentials into position qualifications and by requiring training to be related to attaining competencies, especially for entry-level staff.

Afterschool practitioners and stakeholders play a significant role in turning the broad concept of afterschool

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into a recognized field and profession. Afterschool stakeholders need to:

- Advocate for a comprehensive view of afterschool programming that promotes consistency in requirements across settings and funding sources as well as support for quality improvement.
- Continue their work on core competencies, higher education program content, and afterschool staff credentialing, working with state agencies that oversee the various afterschool programs to connect these efforts to requirements for staff qualifications and training.
- Continue to promote a stronger vision of afterschool work with higher levels of qualifications for afterschool workers, particularly in states with minimal requirements.
- Work to develop continuity among afterschool credentials nationwide to create greater cohesiveness and mobility in the afterschool field.

Congress and the Administration, who set overall policy for care and education for all ages of children and youth and who provide the largest source of afterschool funding, need to:

- Develop an overview of the afterschool field and a unified approach to supporting quality improvement, including defining and supporting staff education and training.
- Promote coordination of professional development and quality improvement funded through CCDF and 21st CCLC.
- Provide leadership in promoting comprehensive oversight and quality improvement through an afterschool initiative similar to the Early Learning Challenge Fund. That initiative would fund state efforts to establish frameworks of standards and quality improvement across early childhood settings (U.S. Department of Education, 2009). A similar initiative for afterschool quality improvement would help coordinate approaches under different funding streams and in different settings, create more consistent standards across programs, and encourage movement toward higher levels of qualifications. Such an effort also should encompass areas that rarely have state oversight, such as programs for teens.

Some states are clearly showing the way in building systems to ensure quality and opportunities for program staff and even bringing different afterschool settings under one umbrella.

The picture of expectations for staff qualifications in afterschool programs is fragmented, but not without bright spots or a sense of new directions. Some states are clearly showing the way in building systems to ensure quality and opportunities for program staff and even bringing different

afterschool settings under one umbrella. Afterschool is finding its way into definitions of qualifications and quality improvement efforts. Though we have a long way to go before support for afterschool staffing is widely addressed in a systematic way, the path to reaching that point is clear. Afterschool can boost not just academic success, but all domains of child and youth development. If afterschool is to fulfill this potential, stakeholders such as government, parents, advocates, and program administrators must be purposeful about ensuring the

central component of quality: the staff who build the relationships that make a difference in children's lives.

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