

## Summary: Public Comments on Workforce Ruleset

#	Date	Source	Name	Comment
1	10/23/25	<i>Form response  Letter</i>	Robert Kleng Eastern Oregon University (EOU) Head Start	See attached <a href="#">letter</a> .
2	10/30/25	<i>Form response  Letter</i>	Mercedes Elizalde Early Childhood Equity Collaborative	See attached <a href="#">letter</a> .

Responses can be found [here](#).

# Eastern Oregon University Head Start (EOUHS) Position Summary

**Subject:** Early Childhood Workforce Registry Proposed Rules (OAR 414-999-0000 through 414-999-0060)

**Submitted to:** Oregon Department of Early Learning and Care

**Date:** [Insert Date]

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## Summary

Eastern Oregon University Head Start (EOUHS) participated in the Department of Early Learning and Care's Rulemaking Advisory Committee meetings held on **October 16–17, 2025**, regarding proposed updates to the **Early Childhood Workforce Registry** under **House Bill 2991 (2023)**.

EOUHS reviewed the draft rules and found that the proposed changes present **positive or neutral impacts** for our program and the communities we serve. The rules focus on streamlining workforce systems and enhancing access and equity for early childhood educators statewide.

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## EOUHS Perspective

- EOUHS operates as a **federally funded, OCC-registered (not state-licensed)** early learning program and already uses the **Oregon Registry Online (ORO)** to verify staff education and training.
  - The proposed rules modernize and clarify registry processes but do **not** change operational, licensing, or federal compliance requirements for Head Start grantees.
  - EOUHS supports the introduction of **free translation services, recognition of out-of-state and international credentials**, and the creation of a **career pathway system** that values experience, education, and cultural knowledge.
  - No fiscal or staffing burdens are anticipated. Minor administrative adjustments may be needed as DELC implements the updated registry platform in 2026.
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## Position Statement

EOU Head Start **supports** the DELC proposed rules for the Early Childhood Workforce Registry.

These revisions strengthen Oregon's professional recognition system, promote equity, and reduce barriers for early learning professionals — outcomes fully aligned with the Head Start mission and values.

EOUHS appreciates the opportunity to participate in the rulemaking process and commends DELC's commitment to inclusion, collaboration, and workforce accessibility.

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**Submitted by:**

**Robert Kleng**

Director, Eastern Oregon University Head Start

rkk leng@eou.edu | 541-786-9025 | La Grande, Oregon

From: Mercedes Elizalde on behalf of  
Organization: Early Childhood Equity Collaborative

## Early Childhood Workforce Registry Rules Advisory Committee (RAC)

### Draft Rule Language

- [414-999-0010 Definitions](#)
- [414-999-0020 Administration](#)
- [414-999-0030: Career Pathways](#)
- [414-999-0040: Foreign Language Translation](#)
- [414-999-0050: Verifying Out-of-State Professional Development](#)
- [414-999-0060: Training Record Access](#)

The Early Childhood Equity Collaborative (ECEC) provides comments and suggested language to select portions of each draft rule. Suggested language additions or deletions are noted in **green** to differentiate that feedback from overall suggestions and reactions.

### 414-999-0010 Definitions

The implementation of how this experience will be validated and how experience recognized aligns with other standards is most critical. We recommend thorough engagement with providers and trainers. We need to ensure a process is going to recognize experience that is grounded in best and approved practices. We recommend reviewing and aligning with other standards for teacher experience qualifications in rules and policies with Certified Child Care Centers and Preschool for All in Multnomah County.

(8) "Early Childhood Education Work Experience" means time spent providing learning experiences and a range of early childhood services to children who are zero through six years of age or those in out-of-schooltime care up to age 12.

The Oregon Registry is a significant bureaucratic system that heavily influences the delivery and experience of childcare and early learning in Oregon. We believe the rules should reflect its consequential impacts on the early childhood workforce. Such as:

(13) "Oregon Registry" or "Workforce Registry" means a **voluntary** statewide registry that documents and verifies the education, training and experience of childhood care and education professionals to support professional development and career growth. It provides a structured pathway to document and share their professional development progress. The Oregon Registry Online is one tool within the Oregon Registry to support childhood care and education professionals to document their career growth and professional development. **There exist DELC programs and policies that may require engagement with the registry to obtain or sustain employment.**

#### 414-999-0020 Administration

We recommend adding language that further clarifies communication outreach alongside publication expectations. Such as:

The Oregon Registry shall ensure that the Early Childhood Workforce has access to a clear and published process for the activities in OAR 414-999-0000 through 414-999-0060 **using multilingual and multimodal tools**

#### 414-999-0030: Career Pathways

We share a few comments in this section to modify language for clarity and to ensure equitable access. Suggestions made for readability include rewording portions of (2) and separating sentences. In (3) "verify" is more true to the authorities and responsibilities of the registry, there are other parts of the system that are responsible for developing and evaluating training for the workforce. Suggestions to Tribal consultation was to clarify authorities and roles. Lastly, adding "focused" when referring to the CTE approved programs ensures that even if a program has a broader title, like "Education CTE" as long as the curriculum and hands-on experience was in an early childhood setting, it would still qualify.

**(2) The career pathway system sets guidelines for how individuals can advance up registry recognized steps through a variety of recognized and approved activities, experiences, and credentials, in combination. Expectation for the number and types of activities, experiences and credentials increase as individuals move through higher steps in the career pathway system.**

~~(2) The career pathway system shall allow individuals to advance to higher steps through a variety of recognized activities, experiences, and credentials, individually or in combination, and shall increase in expectation as individuals move through higher steps in the career pathway system.~~

(3) For the purposes of advancing to higher steps in the career pathway system, the Oregon Registry shall ~~evaluate and~~ accept **and verify** documentation related to Early Childhood Education at a minimum:

(d) Tribal knowledge and experience:

~~(A) DELC will consult with Federally recognized Tribes to establish the validation process~~

**Through Tribal Consultation, Federally recognized Tribes will establish a validation process with DELC**

(C) Early Childhood **focused** Education Career and Technical Education (CTE) courses, without curriculum review unless requested by the high school or other similar education institution.

#### 414-999-0040: Foreign Language Translation

No additional suggested language here. We appreciate limiting financial burden and making this a standard part of the system

#### 414-999-0050: Verifying Out-of-State Professional Development

No additional suggested language here. We appreciate seeing a streamlined process to ensure early learning professionals are able to move to Oregon and join the local workforce with their experience and education from other communities.

#### 414-999-0060: Training Record Access

We agree that more visibility into training records and some additional access for employers may be helpful, however the current rule language does not adequately address the systems needs, and may actually just displace technical assistance responsibilities from system partners like OCCD and CCR&R onto the employer. Records do need to be more visible to employers to confirm steps and professional development levels, this information is needed to both obtain employment as well as sustain it. There are systems within the Teacher Standards and Practices Commission that allow employers to look up the credentials and licenses of people applying for or offered positions. We also believe that trainers and employers should have the ability to bulk submit training documents to confirm training. With ongoing processing delays that employers, trainers and early childhood workforce members cannot do anything about, being able to directly upload training documents could support transparency and decrease processing time on the individual end. This language can be modified to better specify reasons for training record access, that does not duplicate technical assistance already available in the system, but adds transparency where it is needed, such as:

The Department may require the Oregon Registry to develop a process for Employer **and trainer** access to an Early Learning Workforce Member's record in the Early Childhood Education Workforce Registry Database.

(1) Employer access may be used for the purpose of **providing technical assistance to reviewing and confirming necessary training and professional development documentation of** an Early Learning Workforce Member.

(2) Employer access may only be granted with the written permission of the Early Learning Workforce Member.