Date: April 25, 2023

To: Representative Conlon and House Committee of Education

From: Janet McLaughlin, Deputy Commissioner, Department of Children and Families

Re: Comments on S.56 as passed by HHS

Thank you for your focus on meeting the needs of Vermont's young children and their families. We are aligned on the need to ensure that Vermont children benefit from quality early care and learning experiences that support their development and learning.

The Department for Children and Families joins our colleagues at the Agency of Education in expressing deep concern about the proposal in the House's version of S.56 to dismantle Vermont's current Universal Prekindergarten and replace it with school-led prekindergarten for 4yos only.

Working together, Vermont has created a Universal Prekindergarten for both 3- and 4-year-olds in a mixed delivery system which has created a strong base from which that state can continue to build. We should not end this important resource used by nearly half of 3-year-olds in the state in order to expand opportunities for 4yos. There are significant educational reasons to build from the current UPK mixed delivery system and major disadvantages to making such a large change without clearly defining desired outcomes, publicly sorting through options, and directly addressing serious practical implications.

The current Univeral Prekindergarten program – while still needing growth and enhancement – is built from the research-backed understanding that young children are best served in consistent early childhood learning communities tailored to their developmental needs and attendant to the practical realities of families raising young children. The current proposal in S.56 does not call for a prioritization of the developmental needs of young children in the redesign of the system. My understanding is that developmentally 3- and 4-year-olds are typically treated as a preschool cohort because of their age-specific strengths and needs. We also know that the younger children have a greater likelihood that they will experience difficulties with transitions and larger group settings; this is especially true for children who have experienced trauma or other destabilizing situations. Creating separate systems for 3 and 4yos, and putting 4yos into what is likely to be a system that prioritizes school-day, school-year programs, is not a guarantee of better outcomes for children.

## Additional practical challenges to consider:

- Moving to a school-led program only for 4-year-olds will require dismantling valued programs and partnerships. Many communities have thriving UPK programs that serve both 3- and 4-yos based on the needs in their communities; we should not require these programs to end. Vermont's UPK has also strengthened partnerships between many school districts and community-based child care programs who coordinate on kindergarten transitions, services for children with or at risk of developmental delay or disability, and professional development; this is rooted in two years of shared responsibility for each enrolled child, rather than an abrupt transition from one system to the other. In addition, Vermont's Head Start programs that typically serve high-need 3- and 4-year-olds would have less clear connections to and partnerships with their local school districts.

- Having UPK programs that serve 3- and 4-year-olds provides a valuable and needed option for children with disabilities (identified as eligible for EEE services) to join UPK classrooms with other children their age and receive services directly in a familiar setting. It also allows a smoother transition from children moving from Early Intervention (IDEA Part C implemented by CDD's Children's Integrated Services) to EEE (Idea Part C implemented by AOE's Early Ed team.) While there is still certainly still room for improvement, it is far from clear that separate systems for 3- and 4-year-olds would help serve these children more effectively.
- UPK has created an effective and valuable quality incentive for community-based child care programs, encouraging increases in quality ratings while also raising teacher qualifications that have benefited the early childhood education system overall. DCF and AOE have partnered on these programs to the benefit of educators across settings and ages.
- This change will have a significant impact on the physical infrastructure needs for schools and community-based programs that will need to adjust their mix of classrooms. DCF currently provides valuable safety consultation and oversight through Child Care Licensing to ensure that the unique needs of prekindergarten children are met in all UPK classrooms, including schools that have historically been designed with K-6 students in mind. The proposed revision will also mean additional afterschool and summer programs will be needed for 4-year-old children; these programs are necessarily regulated differently for programs serving older children.
- Coming out of the COVID-19 pandemic, many early childhood education programs whether in school, community, or home-based settings are just starting to stabilize and rebuild their programming. Putting a major restructure to the early childhood education system on the table at this moment may mute the impact of other investments proposed in S.56.
- In the next three years, we will have dedicated resources for strengthening our mixed delivery system through a \$23M federal Preschool Development Grant Birth to Five that recognizes the unique developmental stage of 3- and 4-year-olds and value of the mixed delivery system. This is an important opportunity for us to strengthen our current systems that may be lost if energy on the state, district, and program level are focused on this major administrative shift instead of program improvement.

We recommend the proposed Prekindergarten committee be tasked with making plans to expand and strengthen Vermont's Universal Prekindergarten in a mixed delivery model without reducing services for 3-year-olds; this work would include articulating clearly-defined goals and outcomes and address facilities, staffing, administration and the provision of specialized supports for children.