

March 29, 2018

Thank you all for allowing time to hear and receive the comments regarding the preschool portions of s.257 as it pertains to public school preschool programs. I would like to address parts of this legislation that would support the early education from the public programs point of view.

The first topic is the calculation of average daily membership, or ADM. The proposal to count preschool students in the ADM for the school district for those hours above and beyond the ten tuitioned hours, is crucial for maintaining funding for high quality preschools. As the Race to the Top grant comes to and end, so does initiatives like the Preschool Expansion Grant (PDEG). Unfortunately, school districts have been required to level fund their budgets and as such, there is no allowance to anticipate how to maintain these granted preschool programs at the completion of the grant. Counting preschool students in ADM for the portion of their day beyond ten hours, would start building the funds to maintain these classrooms.

I will note that the end of this bill indicates this to start in July 2019 and I would advocate that this start in July 2018 as the process of ADM calculations is over two years. Counting these student must start immediately to cover the gap of grant money expiring and local funds needed when directed to level fund.

The other piece of this legislation our public schools would like to advocate for is in section 3502 regarding exemption from childcare licensing. It has been very challenging as classroom teacher and program director to fit the structure of a public school program into the licensing regulations. The requirements for systems and facilities simply do not apply. I have created an item-by-item grid outlining to which parts of the regulations public schools simply cannot adhere. I am happy to site specific examples but as a general concept, if public Kindergarten programs are exempt, then public school preschools should also be exempt.

There is a direct impact on our future programming as we look toward extending preschool hours by is to creating combined Kindergarten/PreK classrooms. A major barrier to the creation of these classrooms is the fact that when a Kindergarten classroom takes in preschool students, they must follow childcare licensing. This means adding equipment like carbon monoxide detectors, paying for private water lead content testing, and the many other facilities requirements listed. In addition, all staff new to licensing must create an online account in the Building Bright Futures systems to which they must submit all professional learning (repetitive from the AOE process), get fingerprinted (for the third time), and complete a STARS application. This is one of the factors that weighs against collaborations of PK/K programs in our schools. Again, if the public school Kindergarten is exempt and we are advocating for public school preschool, then those too should be exempt.

Thank you for your time.  
I am happy to answer further questions.

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