

Testimony Regarding PreKindergarten

Donna Bailey
for Meg Baker
House Education
4-20-18

Hello, and thank you for this opportunity to provide feedback related to the proposed changes to prekindergarten in Vermont. My name is Meg Baker, and I am the Universal PreK Coordinator for three school districts representing 17 towns and covering the majority of Addison County: Addison Central SD, Addison Northwest SD, and Addison Northeast SU. Our region currently serves about 400 children in PreK programming. Approximately 80% (315 children) of our PreK children are served outside of school buildings in 31 community-based PreK programs, including center and home-based programs.

I have been employed by all three districts as a regional coordinator for Act 166 since the 2015-16 school year, when Addison Northeast SU became an "early adopter" of the law. I am here today to discuss the strengths and limitations of the current administration of Universal PreK under Act 166, as well as considerations that I hope will be factored into any changes that are made. I will skim through these, but hope you will have the time to review my thoughts in greater detail on your own.

PreKindergarten Strengths

- **Consistency:** Regional administration of Act 166 has led to greater consistency for PreK programs and schools. We have developed one central contract, timeline for due dates and payments, and attendance paperwork. Paperwork processes have also been relatively seamless for families as the schools have adopted a common application form and process for acceptance into the Universal PreK program.
- **Access:** Locally, Act 166 has increased PreK participation and the number of early childhood programs with a licensed early educator in the program at least 10 hours/week. New PreK programs have been established to serve more children, and fewer children are entering school without a PreK experience. Although information about at risk PreK children is limited, data related to the number of Medicaid-eligible children has consistently indicated that we are serving this population in expected or even higher than expected numbers. Families appreciate that the funds decrease or eliminate tuition costs for PreK programs.
- **Quality:** The number of programs with a licensed early educator and quality ratings of 3 or more STARS has risen as a direct result of PreK. I have provided mentorship to several programs in our area that have increased their STARS rating so they would be able to partner. We have also worked as a region to create a mentor early educator program where a licensed teacher hired by Mary Johnson Children's Center supports and enhances quality in four of our community PreK programs. This support benefits all the children in the programs, including infants and toddlers.
- **Increased public-private partnerships:** Regional administration has increased partnership and communication between schools and community early childhood programs. As the regional coordinator, I have been able to provide kindergarten teachers and principals with information regarding PreK learning standards and child progress. Our region has also focused on child transitions to kindergarten, holding a PreK/K Transition Summit for all three districts and community programs and developing a shared

Kindergarten Transition Form that is shared by PreK teachers with K teachers. Schools are also sharing information about kindergarten programs with PreK programs and parents.

- **Collaborative professional development:** More collaborative professional development opportunities are available for public and private early childhood educators. For example, collaboration between school and community early childhood programs, Children's Integrated Services, Building Bright Futures, and local mental health agencies around social-emotional development has led to the establishment of a public-private early childhood community of practice and ongoing support and trainings for public school and private program teachers. Collaborative curriculum groups and professional development have attracted home-based, school, and center programs.
- **Information about children:** Basic demographic information and access to TS Gold data has improved information about children in the school budgeting and kindergarten transition processes.
- **Meeting family needs:** Families appreciate the portability of the tuition. In our region, families have a variety of PreK program choices that can match their schedule, location, and other needs and desires. Act 166 allows for children who are in full-day, full-year programs to access the funding, and reduces the transitions for children and logistical complications for families connected to transportation to/from a part-time PreK program.

Limits of PreKindergarten

- **Requirements from the state level that do not consider "on the ground" implications:** Statewide memos from lead agencies and changes in interpretation of the law have led to frustration and added costs at the local level. The criminal background check process is the most well-known of these challenges, but others include: memos related to PreK age-eligibility, requirements for additional data to be collected about Free and Reduced Lunch paperwork, and legislative conversations about potential changes. New CDD licensing regulations, though not directly connected to Act 166, were implemented at the same time, and do not take into consideration the special needs of school programs. The requirements and changes from the state level have made PreK funding and requirements feel unstable for schools and programs alike.
- **Dual administration:** Following two sets of regulations (CDD and AOE) is unwieldy for both community programs and school-based programs. It is often unclear exactly how school-aged policies may affect community PreK programs (i.e. McKinney-Vento, state-placed students, ELL services). CDD licensing regulations are not always well-matched to the school environment. Rapid implementation of state policies which may not consider local impact has led to last-minute scrambling and additional paperwork and costs. Turnover in the Agency of Education has led to a lack of guidance on local issues.
- **Local administrative concerns:** Administrative costs to the program are high even with regional administration which reduces costs and duplication substantially. Communication with multiple partners continues to be an issue. Processing paperwork is a challenge. Paperwork is often difficult to collect from programs. Tracking attendance and reconciling invoices for children who leave or unenroll is challenging. There is no recourse for schools when programs do not return paperwork (i.e. attendance) in a timely way. Further, PreK

providers that work with school districts in other regions are challenged to track the many ways that different systems of paperwork, processes, and deadlines affect them. Schools are challenged to create new paperwork, processes, and deadlines with limited administrative capacity and guidance from the state.

- **Quality assurance:** Quality assurance for distant PreK community programs is a challenge. Also, when a program loses its licensed early educator or in some other way no longer qualifies for prequalification, all of the families who are receiving tuition funds are at risk of losing those moneys. This creates budgetary and ethical issues for families, schools, and PreK programs.
- **Lack of early educators:** There are insufficient numbers of licensed early educators to fully meet the demand created by PreK. No support is offered at a state level to obtain provisional licenses for early educators and superintendents cannot support provisional licenses for those in private programs.
- **Transparency:** Families do not understand the role of the public schools in their tuition payments and this can lead to confusion and frustration related to family payment responsibilities for extra hours beyond PreK. Attendance at many PreK programs and school calendar years are not well matched and this adds to everyone's confusion. Further, the creation of "regions" by some districts has been confusing and frustrating for many programs and families.

Questions and Thoughts about Proposed Changes

Coming from my history of regional administration of a complex PreK system, I have a number of questions about how a reorganization of administration will affect schools, programs, and families. While many of these can be worked out in the rule-making process, they merit consideration as legislation is developed so that we don't "throw the baby out with the bathwater" and lose the components of PreK that do work.

- **AOE capacity:** Does the AOE have the capacity to take on this level of complexity at a state level? There has been substantial turnover in the AOE early childhood team which has limited statewide leadership of Act 166.
- **Ongoing dual administration:** How will the CDD and AOE systems be designed so that they do not conflict? How will PreK funds interface with CDD subsidy dollars in private PreK programming if the administration of the programs occurs in two separate agencies? How will AOE-specific regulations and rules be monitored by CDD in private programming (i.e. for children who are homeless, 504 Plans, etc.)?
- **Tax rate and budgetary implications:** My back-of-the-envelope calculations indicate that our region stands to lose well over \$1 million, possibly as much as \$2 million in our region's school budgets if resident PreK children are not included in the equalized pupil count and schools are paid the statewide rate for PreK. This loss will have long-lasting effects on grades K-12. When will programs be paid for their services? Currently, they are paid in advance which allows many private programs to make payroll, but which has been a challenge for schools. Legislation currently implies reimbursement. How will this be balanced with program need? In addition, I have questions about the funding processes:

How will the AOE handle reconciliation payments when a child withdraws from PreK programming? Will schools that serve PreK children in a full-day program under “school choice” be able to count those children if the children are not district residents? Will “regional adjustments” to the rate be based on school budgets?

- **Localization and complex needs:** Will local school districts be able to make changes to state-level contracts to reflect their individual needs? Who will the contract be between? How will enrollment applications from families be handled at the state level? How will locally different enrollment practices (i.e. age-eligibility date) be handled at the state level? How will child residency be determined and tracked? Will there be a grievance process for schools, families, and programs? How will complicated issues created by homelessness, DCF custody, etc. be handled? How will the state ensure that a child is not enrolled in both a school based program and a community PreK program? Will the AOE be handling enrollment in school-based PreK programs in a centralized way also? How will enrollment by children who are not yet three but are placed in a PreK classroom (either school or private) be handled? How will families understand enrollment?
- **Paperwork processes:** How will attendance be tracked and monitored? How will census data be collected at a local and state level? How will required data be collected and monitored by schools and the AOE?
- **Special services:** How will children with locally-driven special education services and PreK tuition be served under a centralized contracting model? What will be done about ELL services? The weakest area of the current law is the lack of portability for special education services. A solution should be identified that gives equitable tuition portability to all or restricts portability to create equity.
- **Local collaborations:** How can local schools continue to be involved with community PreK programs? Will this impact current partnerships around training and professional development? What kind of student data will be available to districts about their resident PreK children? Will TS Gold data on child progress continue to be available to resident school districts in an individual and aggregate way? How can we track that data longitudinally? How can kindergarten transitions occur as seamlessly as possible?
- **Hours of PreK:** Most early childhood educators would agree that 10 hours/week is really insufficient for children to make significant progress and capping payments at this rate does not support programs who are serving children for more hours.
- **5 year old children:** The new language rules out tuition payments for children who are age-eligible for kindergarten unless they have an IEP or 504 Plan. Sometimes there are other legitimate reasons for retention. Perhaps language could create a variance process for children who are deemed by a team (PreK teachers, parents, and local school representatives) to need additional PreK in a way that would be consistent with retention policies for other grades.

Thank you for this opportunity to address you today and for taking the time to consider the needs of some of our youngest learners. Please let me know if you have any questions.