



Date: Thursday, February 8, 2018

To: House Education Committee

From: Sherry Carlson, Senior Director, Vermont Birth to Five

Testimony on Proposed Changes to Vermont's Universal, Publicly-Funded Pre-K Program (Act 166)

Good morning. My name is Sherry Carlson, and I am the Senior Director for Vermont Birth to Five. I appreciate the opportunity to speak with you today about the proposed legislative changes to Vermont's universal, publicly-funded pre-K program.

Through close collaboration with state agencies and community organizations, Vermont Birth to Five works to ensure every young child in Vermont has the best start possible. Vermont Birth to Five does this by directly engaging with child care providers, schools and communities to improve program quality, capacity, and operations. Before I began my current role with Vermont Birth to Five, I worked as the director of a multi-site, nationally-accredited early care and education program for 23 years, and for the past 10 years as an early childhood care and education consultant. Schools, higher education, and foundations have employed me, but I consider my clients to be Vermont's children.

Personally, I began my universal pre-K journey in 2001 working with schools in both Franklin and Chittenden counties. My work on this issue has continued through the Vermont Community Preschool Collaborative, also known as VCPC, a program of Vermont Birth to Five. VCPC is focused on supporting and sustaining communities in the equitable implementation of publicly-funded pre-K in Vermont. It is through this work I became a member of the interagency Act 166 implementation team. I have seen firsthand the hard work and commitment of both agencies to advance universal pre-K in Vermont.

Vermont Birth to Five appreciate the efforts of the Agencies of Education and Human Services to thoughtfully consider and propose changes to Act 166. We support the agencies' commitment, reflected in the proposed legislation, to preserve what we consider to be the key components of Act 166: universality, mixed-delivery, and portability.

In reviewing the draft internally and with stakeholders in the field, we have come across questions related to three key areas of the proposal.

Health and Safety

First, Vermont Birth to Five would like to raise some questions and suggestions related to proposed legislation's language regarding safety and quality rules for public pre-K programs. that, "A public provider shall meet the minimum program quality by... meeting safety and quality adopted by the State Board of Education...." (page 5, lines 14-15 of the current draft of 18-0839).

All children deserve safe, supportive environments in which to learn and grow. We recognize that Vermont public and private schools are guided by specific health and safety standards designed to promote such a learning environment. However, young children have different health and development needs than older children, and Vermont Birth to Five believes that these differing needs must be recognized and considered.

Most of our schools were not designed/built with the intention of serving children under the age of 6 or 7. As a director of a multi-site early care and education program, 3 of the sites I oversaw were in schools, so I know what changes needed to be made to ensure they were safe for young children. Egress, playground structure, supervision, positioning of heating systems, bolting down of furniture, etc. Currently, under Act 166, public pre-K programs and private pre-K programs must meet the same safety regulations issued by Vermont's Child Development Division. Friends who are pre-K teachers in public schools have told me that the only way they can get their maintenance needs filled in regards to health/safety is to point out to school staff that they are not in compliance with the current child development regulations required under oversight by CDD. They use the current regulations as a tool to ensure the safety of the environment for the young children in their class. As a side note, it is my understanding that safety violations occur in public programs at the same frequency as they do in private programs, and I encourage you to fully explore this.

An important aspect of the current health and safety regulations in place for pre-K programs is that they stem from federal guidance. The U.S. Administration for Children and Families has identified minimum health and safety criteria, through rule-making and legislation, that should be present in any early childhood care and learning environment eligible to receive public funds in a manual called ***Caring for Our Children Basics: Health and Safety Foundations for Early Care and Education***.^{1, 2} Given federal recognition of *Caring for Our Children Basics* as minimum standards for early care and learning environments, we recommend that any safety and quality guidelines adopted by the State Board of Education for public pre-K programs, at a minimum, be aligned with or build upon *Caring for Our Children Basics*, and ideally be aligned with existing Vermont safety regulations for early care and learning programs. Creating something new seems inefficient, it may be helpful to gather a group of smart pre-K providers, administrators, and early special education providers to take a look at current regulations and identify opportunities for alignment.

Capacity

Our second concern is related to capacity, which lies at the heart of ensuring equitable access to pre-K programming. We recognize that the implementation of Act 166 has spurred growth in pre-K capacity throughout the state, but, to the best of our organization's understanding, the state does not have a full assessment of pre-K capacity and whether it meets the needs of families and communities.

Additionally, given that Act 166 only provides funding for 10 hours a week for 35 weeks per year of pre-K programming, many families must make additional arrangements for care and learning beyond the 10 hours. Analysis of pre-K capacity must be understood in tandem with the early care and learning needs of families and the options available beyond the 10 hours covered by Act 166.

One key factor that may impact capacity is the proposed legislation's recommendation that all private programs have a licensed early childhood educator "**present during the hours the program is delivered**". Currently, family child care home providers may work with a licensed teacher mentor to offer pre-K programming. In these situations, the pre-K teaching mentor is usually onsite for at least 3 hours per week. Without diving in the weeds of staffing patterns on this, this change in wording could also impact private center based programs. Given this proposal, we suggest that the agencies and this committee evaluate how pre-K capacity may be impacted at the community level, particularly in rural communities where pre-K programming may only be available through a family child care home provider, to determine if this requirement should be phased in over time.

Additionally, Vermont Birth to Five noted that the proposed legislation eliminates language regarding community-focused pre-K capacity planning that is currently a part of Act 166, and we are curious about the removal of this section. Through our own work, we have found that in order to create sustainable, effective solutions, community needs and considerations must be at the forefront of capacity development. This is especially true in our current community-led capacity building efforts in pilot communities throughout the state. This process includes a wide variety of stakeholders including child care provider, pre-K programs, state agencies, and community partner agencies. We believe that community-focused capacity planning can help to balance well-intentioned capacity expansion plans with pre-K's unique connection to the rest of Vermont's early care and learning system. For example, if a public program were to drastically increase their pre-K capacity, this may impact not only pre-K programming at private programs, but also impact the infant, toddler, or after-school capacity of the program. We strongly encourage this committee to consider retaining the community capacity evaluation and development language from Act 166.

STARS

Finally, we would like to raise some considerations regarding the proposed legislation's move to exempt public pre-K programs from participating in STARS, Vermont's quality recognition and improvement system for regulated child care and early learning programs. Vermont Birth to Five believes that all early care and learning programs benefit from participating in quality recognition and improvement work, both private programs and public school-operated pre-K programs.

Quality recognition and improvement systems are considered a national best practice for state early care and learning systems, and linking publicly-funded pre-K programming to state quality recognition and improvement systems is also considered a national best practice.^{3, 4}

In Vermont's quality recognition and improvement system, called STARS, programs can receive a designation of 1 to 5 stars. Currently, Act 166 requires both public and private programs to have 4 or 5 stars, or at least a 3-star designation with a plan to get to 4- or 5-stars within 3 years of submitting their plan. This requirement has proven to be a useful quality-improvement tool, as many programs, both public and private, have improved their quality since implementation of Act 166. As of the September 30, 2017, 101 prequalified pre-K providers had increased their STARS quality recognition level since the end of 2015 (this represents about 1/3 of the total prequalified pre-K providers for the fall of 2017).⁵ To assume that public prekindergarten programs are less in need of a quality improvement tool than private programs is naïve. It is also important to note that the STARS tool is currently being

improved with the goal to ensure better consistency between programs at each rating. I think this revision will provide simplification of the process as well as better alignment with the dynamics present at schools. Given this revision process, the exemption of public pre-K programs from participating in STARS seems premature.

Additionally, Vermont Birth to Five believes that STARS is a powerful and important tool for family engagement. Under the STARS program, families are able to evaluate how all pre-K programs compared to one another on the same scale. By removing public programs from STARS, families will no longer be able to use one standardized tool to compare programs to one another.

We strongly encourage this committee to consider opportunities for public programs to continue to participate in STARS to ensure streamlined quality development and utilize an existing tool that families are familiar with, allowing them to more easily compare and contrast pre-K options.

Summary

In conclusion, Vermont Birth to Five greatly appreciates the work that has led to the current proposed legislation and we hope that the areas of concern that we have flagged for this committee can be further explored and strengthened to ensure that all Vermont children have the opportunity to benefit from high-quality pre-K programming.

Thank you very much for your time and consideration. I am happy to be a resource at any time during this process or connect you with resources-both from the private sector, public schools and families. I have spent 33 years trying to create and ensure access to the best possible early childhood experiences for the children in Vermont and I am deeply committed to this work.

¹ Administration for Children and Families, U.S. Department of Health and Human Services. (June 25, 2016). *Caring for Our Children Basics: Health and Safety Foundations for Early Care and Education*. Retrieved from https://www.acf.hhs.gov/sites/default/files/ece/caring_for_our_children_basics.pdf

² Office of Child Care, Administration for Children and Families, U.S. Department of Health and Human Services. (2016). *Overview of 2016 Child Care and Development Fund Final Rule*. Retrieved from https://www.acf.hhs.gov/sites/default/files/occ/ccdf_final_rule_fact_sheet.pdf

³ Build Initiative. *Quality Rating and Improvement Systems (QRIS)*. Retrieved from <http://www.buildinitiative.org/TheIssues/EarlyLearning/QualityQRIS.aspx/>.

⁴ BUILD Initiative. (2017). *Toward Coherence: State Approaches to Integrating Pre-K in QRIS*. Retrieved from: <http://buildinitiative.org/Portals/0/Uploads/Documents/Resources/QRIS%203/TowardCoherence.pdf>

⁵ Vermont Birth to Five. (2018). Analysis of *Vermont Child Care Provider Data* (updated October 24, 2017). Data set published by the Vermont Child Development Division, Department for Children and Families. Retrieved from data.vermont.gov.