Hi my name is Sonja Raymond and I am the owner of Apple Tree Learning Centers in Stowe a Pre-k partner program for 8 years. I am also the ED for the Vermont Association for the Education of Young Children, the state's affiliate of the National Association for the Education of Young Children. Thank you for giving me time to speak on behalf of the proposed legislation related to Act 166.

Having been a partnering program for so long, I have seen the amazing benefits that access to a high quality pre-k program brings with regards to school readiness in every realm. I appreciate the work of the Agency of Education and Agency of Human Services to develop a new proposal for publicly-funded pre-K in our state, however, I believe some of the proposed changes could actually potentially hinder private programs' ability to offer a robust pre-k program and the ability of families to access these programs.

The first area of concern is on page 1, Sec.1 lines 16, 17, 18, 19 where it reads

"Prekindergarten child" means a child who, as of the date established by the district of residence for kindergarten eligibility, is three or four years of age or is five years of age but is not yet eligible to be enrolled in kindergarten. "

Having owned and directed an early education program for 18 years, I can tell you that there is a very small number, maybe half a dozen, children that have ever remained in pre-kindergarten even though they were eligible to go to Kindergarten. In the instances that this did occur it was based on a team decision after months of meetings and discussions. All of these children were in need of another year of preschool and many had disabilities that made some aspects(~~(~~s) of their learning and development a major challenge. These teams included the child's parents, service providers and teachers. These decisions were not made lightly, but were made with the child's best interest in mind. In every case, these children enter kindergarten much better prepared with far fewer challenges than they would have otherwise had should we have pushed them along. I understand that the Agency of Education has clarified in other documents that children with an IEP may be eligible to access to a third year of pre-K, but when I review the current proposed language, I do not see this noted in the language. In the interest of best serving children and their families, it would be helpful if this was clarified in any new legislation.

Another area of concern is on page 7, lines 12-21 which reads

"Pursuant to subdivision 4001(1)(C) of this title, a district in which the child resides may include within its average daily membership any prekindergarten child for whom it has provided prekindergarten education in excess of ten hours per week for 35 weeks annually and the district shall not charge tuition for these educational services. A private provider, or a public provider that is not the child's district of residence, may receive additional payment directly from the parent or guardian only for prekindergarten education in excess of the publicly funded hours paid for pursuant to this subsection."

Many people are interpreting this section is to mean that a public pre-k program could offer more than ten hours and count the children in the program in the ADM for the hours beyond 10. A private program however, could offer more than 10 hours of pre-k, but their children would not be counted in the ADM for hours beyond 10 and they would have to rely on parents ability to pay rather than public funds for these hours. If this is an accurate interpretation, I would urge this Committee to change the language to allow school districts to enter into agreements with private providers to offer more hours so that a school district could count the children in that private program in the ADM and then the private program could receive some payment for the additional hours from the local school district. Not doing so puts private programs at a huge disadvantage. Private programs would gladly offer more hours of pre-k but what need additional funds to do so. If a parent has a choice of two programs of the same quality that both of 20 hours of pre-k, one that is free for the 20 hours or one that costs money, they will choose the free program. If private programs loose preschool students the viability of their entire program is in jeopardy, including their ability to serve other age groups. This has ramifications far beyond pre-K.

Another concern I have is on pages 16 & 17 Sec. 3 which refers to the requirement of private programs providing prekindergarten education to hold a license or registration from the Child Development Division but not a public provider of prekindergarten education. While I understand the purpose behind this section, I am concerned that new licensing regulations were approved just 2 years ago with the assumption that they are important for all children. I have particular concerns about the health and safety sections of the licensing regulations, which are far more stringent than public school standards. I would recommend that public pre-k programs be required to adapt some version of the health and safety section of the CDD state regulations.

Finally, I am concerned that the important connection between the school districts and the private programs will be lost with the elimination of much of the language in this proposed legislation. In my experience, partnering with the school districts has been a benefit to both private and public programs and has significantly strengthened communication and cooperation around students. For my program, the districts have been a great collaborating partners for in many ways. This new proposal does not encourage or incentivize collaboration.

Overall many of the changes made in the proposed legislation related to Act 166 are improvements to the current legislation, but these particular changes could compromise the quality of programming, financial stability of private programs and what is in the best interest of the child. I encourage this committee to consider these changes.