



Date: Thursday, February 1, 2018

To: Senate 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 afternoon. My name is Sherry Carlson, and I am the Senior Director for Vermont Birth to Five. We, along with Let's Grow Kids, are initiatives of the Permanent Fund for Vermont's Children. I have also worked as an early childhood care and education consultant and as a child care provider in the state. 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 directly engages child care providers and communities to improve program quality, capacity, and operations. Our organization also encompasses the Vermont Community Preschool Collaborative, which is focused on supporting and sustaining communities in the equitable implementation of publicly-funded pre-K in Vermont. As an organization that is closely tied to the implementation of Vermont's pre-K program, we appreciate the efforts of the Agencies of Education and Human Services to thoughtfully consider and propose changes to Act 166 in order to advance pre-K programming in our state. 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.

Capacity

Our first area of 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, we do 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 early care and learning options available to families beyond the 10 hours covered by Act 166. These needs vary from community to community. In reviewing the proposed legislation, we have questions regarding two factors that may impact pre-K capacity moving forward.

One key factor that may impact capacity is the proposed legislation's recommendation that all private programs have a licensed early childhood educator present for all 10 hours of publicly-funded programming. Presently, 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. Given the change in the proposed legislation, 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. We are curious about the removal of this section, as 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. Vermont Birth to Five is currently launching community-led capacity building efforts in a number of pilot communities throughout the state, building on the work of our Vermont Community Preschool Collaborative. We have found that in order to create sustainable, effective solutions, community needs and considerations must be at the forefront of capacity development. We strongly encourage this committee to consider retaining the community capacity evaluation and development language from Act 166.

Health and Safety

In addition to questions about capacity, Vermont Birth to Five would like to raise some questions and suggestions related to the legislation's proposal to develop a safety and quality rule, to be adopted by the State Board of Education, for public pre-K programs. 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 should be recognized and considered in the State Board of Education's adoption of a safety and quality rule for public pre-K programs.

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*.^{i, ii} These guidelines inform Vermont's regulations for licensed or registered child care and early learning programs, including private pre-K programs. Given federal recognition of *Caring for Our Children Basics* as minimum standards for early care and learning environments, we recommended 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.

STARS

Finally, we would like to raise some considerations regarding the proposed legislation's move to not require 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, providing a framework for communities to build strong early programs and allowing states to gather data to help families and policymakers better understand these programs.ⁱⁱⁱ Currently, all but one state uses or is developing a quality recognition and improvement system for their child care programs.^{iv} Given the importance of such systems, linking pre-K programs to a state's quality recognition and improvement system is also considered a best practice.^v

In Vermont's quality recognition and improvement system, programs can receive a designation of 1 to 5 stars. Currently, Act 166 requires both public and private programs to have 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 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).

Additionally, Vermont Birth to Five believes that STARS is a powerful and important tool for family engagement. Since the launch of universal, publicly-funded pre-K programming under Act 166, public and private pre-K programs have participated in STARS. 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 public and private 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.

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- ⁱ 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
- ⁱⁱ 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
- ⁱⁱⁱ Build Initiative. *Quality Rating and Improvement Systems (QRIS)*. Retrieved from <http://www.buildinitiative.org/TheIssues/EarlyLearning/QualityQRIS.aspx/>.
- ^{iv} QRIS Network. (January 2017). *Current Status of QRIS in States*. Retrieved from <http://qrisnetwork.org/qris-state-contacts-map/>.
- ^v 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>