Hello, my name is Pat Miller and I am the Braintree Elementary Principal in Orange Southwest Supervisory District. Our community has very few private childcare options and families in the Randolph area have great difficulty finding high quality care for their young ones. One long term childcare center recently closed due to a retirement and another center cut their hours because they could not find anyone qualified to work in their program. I have been involved in the past year in the Randolph community working on a committee to try and increase our private childcare options but this is a long term project. With limited private options the public schools stepped up to help families have local programs that they wouldn't have to travel 30 miles to reach. We hope that we will be able to form a private/public partnership or some type of complementary program between both sectors. We currently have public preschool programs in Randolph, Braintree and Brookfield Elementary schools. Families told us they needed additional options for full day so in two of the schools we offer extended childcare options. I'd like to thank you for the opportunity to speak today and talk to you about my experiences with licensing, staffing and other details involved in opening up public preschool programs in Vermont.

Like many towns in Vermont, we are trying to meet the needs of our community by offering a wide variety of options for high quality early childhood education. As I moved forward in our plans to open programs in each elementary school I found the task of figuring out licensing, staffing regulations, Bright Futures requirements, and all of the other details to be overwhelming and untenable. I had very little guidance on what action steps to take and what guidance I did receive from Bright Futures, the Department of Children and Families and a regional preschool coordinator all conflicted with each other. I found the licensing regulations to be burdensome given our plans to open this program inside an already well established and licensed K-6 building. Abiding by the many health and safety rules developed by the State Board of Education, as well as Vermont codes for public buildings required me to repeat tests on systems such as HVAC systems, fire systems, water systems, lead paint information and many more items that were already documented since we were a fully licensed elementary school. These redundancies and duplicate tests are paid for with tax payer monies and are time consuming for staff. Public schools have much more oversight than private programs or home childcare centers, school boards, superintendents, facilities coordinators, food service managers, principals and licensed teachers that it seems like the state is putting up barriers to public schools.

I found it difficult to understand that I could have a classroom of five year olds right next to a classroom of four year olds in the same building and yet I was being asked to prove that four year olds were in a safe building when what schools were doing for five year olds was totally acceptable and also safe. On top of the physical licensing of the space and building, then came the regulations for staffing. Finding a high quality licensed early childhood educator wasn't a problem since that is a task public schools are used to doing- finding great educators. We have collective bargaining agreements and compensate our staff members fairly. Finding support staff members who meet the licensing requirements is much more difficult. First you have to figure out the terms used by child care licensing in the regulations such as teacher associate, teacher assistant, trainee and classroom aide. Those terms don't match what is in our collective bargaining agreements so I had and continue to have no way to offer different compensation

packages to each of those staffing categories. These staff members are required to have a variety of trainings along with professional development plans similar to what teachers have (IPDP) and obtain 15 hours a year of training. If I hire a special education para-educator to be with a child with severe disabilities neither of these requirements are required. The other staffing hardship involves using substitutes. I hire all of our elementary substitutes for our three elementary schools in the OSSD. I am very familiar with interviewing, calling references, obtaining background checks and using my professional judgement to determine if someone would be an appropriate elementary substitute or not. I only want to put safe and effective adults in front of children. Unfortunately the same substitutes that I place in a kindergarten classroom do not come close to meeting the requirements to be in a preschool classroom. To be in a preschool classroom, those same adults must have a more complex background check, complete a ten hour on line orientation class, complete a 2 hour mandated reporter training class and be CPR certified. Again, with classrooms right in the same building and under my supervision these regulations seem unfair and do not provide equity to our children. They somehow imply that keeping four year olds safe is more important than keeping five year olds safe. School districts have their own systems already in place for all of these areas and we use our health office with registered school nurses to assure the safety of all children.

An additional area that is required under child care licensing regulations is a variety of paperwork that has different components than we have for k-6 students such as staff handbooks, family handbooks, signage in the school, registration forms, health forms, record keeping systems, and as if this isn't enough preschool programs are required to enter much of this information already provided to licensing personnel into the Bright Futures Information Systems. Elementary schools have staff and family handbooks, registration forms, health forms etc... already in place and the preschool requirements necessitate in the rewriting of completely new forms and handbooks.

Today I have spoken about the process of opening and operating a public preschool program while collaborating with local providers to assure that high quality choices are available in each community. In the Randolph area there were not private programs available to our families and while we tried to get interest from private providers to expand or open additional programs we were not successful in that endeavor. This left the task of expanding program options on the public school system. This process is complicated and fraught with time consuming tasks that are extremely redundant for public schools. Programs must complete the paperwork for licensure, get inspected, then after opening, obtain an evaluation using the Early Childhood Environmental Rating Scales or ECERS and subsequently write an improvement plan based upon these results. Upon completion of all of these steps programs can then apply for 4 STARS if the program has met the requirements and then hopefully get pre-qualified. One of my biggest worries is the burden being placed on public school systems by the intense and redundant regulations. I can be a bit stubborn when I believe something is the right thing to do so I didn't give up but other principals and school districts in general have a lot on their plates and I'm sure this won't be a high priority in every district. Unlike many elementary principals I began my education career teaching preschoolers and eventually moved into special education so I have first hand knowledge of the benefits of early education. I believe that providing high quality

education for preschoolers not only benefits the child and the child's family but will save taxpayers money in the long run. Only through working with our community and having perseverance and hard work have we opened our three preschools. Receiving programming and intervention early is necessary for young children to combat the negative effects of childhood trauma such as dis-regulated children that we are seeing more and more of. A reduction in regulations governing public preschool programs could use taxpayer money more equitably and efficiently to enable more young children to access these beneficial programs.