



Vermont  
Superintendents  
Association

To: Members of the House Education Committee  
From: Traci Sawyers, Executive Director for the Vermont Council of Special Education Administrators  
Sue Ceglowski, Executive Director for the Vermont School Boards Association  
Jay Nichols, Executive Director for the Vermont Principals' Association  
Jeffrey Francis, Executive Director for the Vermont Superintendents Association  
Re: Testimony - H.935: An Act Relating to Prekindergarten Education  
Date: March 12, 2020

On behalf of the organizations listed above, we thank you for the opportunity to provide testimony on H.935, addressing Act 166 and prekindergarten education. We have been and continue to be interested in the provision of prekindergarten education and the child outcomes related to Vermont's Universal Prekindergarten system.

In 2017, Secretary Holcombe (AOE) and Secretary Gobielle (AHS) issued recommendations that would have addressed several of challenges associated with Act 166. The concerns have not been resolved.

The House Education Committee heard a significant amount of testimony and this bill reflects small steps to stabilize a very complex system. According to the National Institute on Early Education Research, Vermont's rating on the Essential Elements is 7 of 10, due to lack of:

- the requirement of a lead teacher with a BA degree,
- the requirement of assistant teacher with a Child Development Associate (CDA), and
- required professional development (NIEER, 2018)

Lori Connors-Tadros of NIEER talked with the House Human Services Committee and suggested that Vermont has focused on capacity and now it is time to focus on quality indicators. Because of the concern for sufficient workforce, this bill calls for a study of the workforce rather than addressing the required credentials of the workforce at this time.

The House Human Services Committee principles align very well with the core principles of our four organizations, as noted below:

House Human Services Principles:	Core Principles of: <ul style="list-style-type: none"> <li>• VT Council of Special Ed. Administrators</li> <li>• VT School Boards Assoc,</li> <li>• VT Principals Assoc, and</li> <li>• VT Superintendents Assoc.</li> </ul>
Ensuring that vulnerable Vermonters are safe and protected	Quality, Equity
Ensuring systems are maintained to assist Vermonters in moving out of poverty	Equity
Ensuring that we address problems and remove barriers that can lead to even greater costs to the State	Simplicity & Efficiency (fiscal responsibility)
Ensuring that all Vermonters have access to services and supports that will enable them to attain their highest level of independence & realize their potential	Equity

We support H.935 as passed by the House Education Committee because it promotes changes that will streamline the delivery system while preserving opportunities for children and families. It also acknowledges current concerns about inequitable opportunity for children through focused analysis and study. It does not remedy those concerns but it advances efforts to address them.

**Summary of H.935 changes:**

	<b>Topic</b>	<b>Anticipated effect on private providers</b>	<b>Anticipated effect on public providers</b>	<b>Notes</b>
1	Definition of a Prekindergarten child	None	None	Simplicity: provides clarity & consistency to the field regarding eligibility for publicly funded preK education
2	Amends the definition of public provider (any SD, even when the child is not enrolled in his/her resident SD, regardless of the district of residence of the enrolled child)	None	Minimal: All SD programs will be classified as “public”	Simplicity: provides consistency & reduces paperwork for some programs
3	Replaces the requirement to meet with AHS, AOE and BBF to develop a regional plan with requirement of notification of public program expansions	None	Minimal: Requires additional steps when a school board wants to discuss PreK expansion. “Expansion” means additional teachers or classrooms, thus an effect on the budget, discussions would occur during budget development, concluding in the winter, well before the budget is prepared for voting, for a change would not take effect until the following school year	Simplicity
4	Notification of private program expansion (60 days prior to commencement)	Minimal: notify stakeholders (expansion could occur at any time with 2 months notice)	None	

	<b>Topic</b>	<b>Anticipated effect on private providers</b>	<b>Anticipated effect on public providers</b>	<b>Notes</b>
5	Requirement of NAEYC or 4 or 5 STARs	Minimal (2 prequalified providers w/ 3 STARs)	Minimal (1 prequalified provider w/ 3 STARs)	Quality
6	Centers: employ or contract with licensed teacher	None	None	Rule: 2605(1) & (2)
7	Family Home programs: receive regular, active supervision and training from a licensed teacher	None	None	Rule: 2605(3)
8	Public programs must meet safety and quality rules adopted by the State Board of Education (SBE)	None	Significant: "the Agency of Education shall adopt rules in accordance with 3 V.S.A. chapter 25 addressing any gaps..." Cross-walk would address any health & safety issues not already addressed in SBE Rules & VT Code	Quality & Simplicity
9	AHS (private) & AOE (public) provide publicized list of qualified providers on their websites; BBF provides searchable, merged list	None	None	Simplicity
10	Uniform forms & processes (contracts, invoicing, enrollment, attendance)	Significant (will align forms & timelines for contracts w/ all SDs)	Minimal (SDs will use pre-established forms & processes that may or may not align with current practice)	Efficiency & Simplicity
11	Each agency ensures quality	None	Moderate (requires SD to ensure that provider is on the list of qualified providers, but removes responsibility of SD to monitor private programs and provides immunity from liability except for Spec Ed services provided by the SD and except when the SD has knowledge of a breach of health &	Quality & Simplicity

			safety rules)	
	<b>Topic</b>	<b>Anticipated effect on private providers</b>	<b>Anticipated effect on public providers</b>	<b>Notes</b>
12	Regulatory Oversight (AOE for public; AOE & AHS for private)	None	Moderate: • reduces duplicative regulations (for basic health & safety) • maintains CDD review for STARS • programs w/ CCFAP, CDD regulated	Simplicity & Efficiency
13	Monitoring & Evaluation • Secretary of Education & Commission for DCF will establish comparable monitoring systems to promote optimal results for children and to collect data that will inform future decisions • AHS & AOE jointly report results	None	None	Quality, Simplicity & Efficiency
14	Study: Availability of qualified teachers (General Assembly finds it is best practice for prekindergarten education to be delivered through high-quality, effective direct instruction by qualified educators who use evidence-based practices within intentionally designed early learning environments, but recognizes there may be a shortage of teachers. Study will investigate issues that may arise if all programs were required to have licensed teachers and how many hours of instruction by a licensed teacher should be required)	No immediate effect	No immediate effect	Quality
15	Vision & Capacity • 5- & 10-year plan • feasibility of expanding “kindergarten” to s • bridging of child care, early education, needs of	No immediate effect	No immediate effect	Quality & Efficiency

	working families, and parent engagement			
	<b>Topic</b>	<b>Anticipated effect on private providers</b>	<b>Anticipated effect on public providers</b>	<b>Notes</b>
16	Special Education (Work Group) <ul style="list-style-type: none"> <li>• study how every child can access the special education services s/he needs, even when s/he is outside of the SD boundary and</li> <li>• how those services should be funded</li> </ul>	No immediate effect	No immediate effect	Equity, Quality & Efficiency
17	Prekindergarten Coordinators (Seed grants) <ul style="list-style-type: none"> <li>• no less than 3 SUs</li> <li>• AOE will provide TA</li> </ul>	No immediate effect	No immediate effect	Quality, Simplicity & Efficiency

**Resources:**

Building Bright Futures, Universal Prekindergarten webinar (Feb 19, 2020) at <https://www.youtube.com/watch?v=rJwbX0JV6B8&t=46s>

Prequalified PreK Programs with 3 STARS (accessed 3/5/2020)

[http://www.brightfutures.dcf.state.vt.us/vtcc/process.do?0Uerwm3dguw3YEa.aU7zaju.xnn.xGOGO-O6-Oh%2bSO%256U0d%256UOG.G60guAEK\\_kmujsu3rmugwkmpwUVm3kmLmkkUs\\_umUkYAgSjUVVjUVm3mWgMmr3gjumkz13-SgYEjWekr3%3dxgupYYUe36gwEkeUs3peYY.wjRszYgUVmYUe36gwUVm3kmLmkkUs\\_umUkYAgueUku36gkz13ShD60G66O6ODD\\_O](http://www.brightfutures.dcf.state.vt.us/vtcc/process.do?0Uerwm3dguw3YEa.aU7zaju.xnn.xGOGO-O6-Oh%2bSO%256U0d%256UOG.G60guAEK_kmujsu3rmugwkmpwUVm3kmLmkkUs_umUkYAgSjUVVjUVm3mWgMmr3gjumkz13-SgYEjWekr3%3dxgupYYUe36gwEkeUs3peYY.wjRszYgUVmYUe36gwUVm3kmLmkkUs_umUkYAgueUku36gkz13ShD60G66O6ODD_O)

Recommended Reform of Act 166 (nov. 2017)

<https://education.vermont.gov/sites/aoe/files/documents/edu-legislative-report-act166-recommended-reform-from-aoe-ahs.pdf>