



Date: Wednesday, February 5, 2020
To: House Committee on Education
Testimony From: Sarah Kenney, Senior Director of Policy
Sherry Carlson, Senior Director of Community and Workforce Strategies
Re: Draft Bill V3.1

Thank you so much for the opportunity to speak with the committee today about universal prekindergarten (UPK). We are grateful for the care you're bringing to this important topic. We want to focus our comments today on what we see as our shared overarching goal of this work – what is best for children and their families. We often get bogged down in the details of implementation obstacles and impacts on systems and administrators, as opposed to focusing on impacts for children and families. Overall, Vermont is a national leader in the number of eligible children served by our UPK program, and that's something we can be proud of. Let's focus any changes on making sure that we're improving outcomes for children. As the committee has discussed, a central consideration is the fact that most families need more than ten hours a week of care. For many children, the ten hours of publicly-funded UPK are just one portion of their overall care and education. This consideration must be part of any discussion of the impacts of potential changes.

We want to express appreciation for the framing in the PowerPoint presentation by the Vermont School Boards Association, the Vermont Superintendents Association, the Vermont Principals Association, and the Vermont Council of Special Education Administrators. We at Let's Grow Kids use the NIEER benchmarks as a guide in our policy and programmatic work and agree that NIEER research should be driving policy changes. We may not agree with every detail the witnesses presented, but we do agree that equity, quality, and simplicity are key, and that we should be working towards meeting all the benchmarks NIEER has identified as hallmarks of a high-quality prekindergarten system. We strongly encourage the committee to hear directly from NIEER.

We'd like to offer comments on the draft bill:

Definition of pre-K eligible children

- §829(a)(1)(B) - We appreciate the committee's efforts to establish clarity on age eligibility and the inclusion of accommodations for children with specialized needs. This eligibility has been a point of confusion in the field and clarification in this context makes sense.

Administrative Oversight of Vermont's Universal Pre-K (UPK) Program

Bifurcation

- §829(e)(1) - Let's Grow Kids is concerned with the draft's proposal to bifurcate administrative and regulatory oversight of Vermont's UPK program. Separating joint oversight of the program is much more than a small "tweak" – it fundamentally changes Vermont's UPK program and has long-term impacts.
- We agree with Paul Behrman's assessment that both the Agency of Education and the Agency of Human Services bring unique expertise and insight to the table, and, while there have been some challenges, both public and private programs have benefited from the expertise of both agencies.
 - AOE has helped to elevate the quality of instruction in community programs through VELs, teacher partnerships, etc.
 - CDD has helped school-based programs adjust physical spaces to best meet the needs of younger children and to incorporate practices that may not be commonplace in K-12.
- §829(d)(6) - Related to health and safety – it would be very challenging for AOE and school districts to create a new, separate system for monitoring health and safety standards for young children, especially given the current constraint on resources within AOE and at the SU and SD level.
- With the current joint oversight, if there are significant violations of health and safety regulations, both public and private programs have those violations noted through BFIS' public portal. This helps to inform families and compare apples to apples. Additionally, CDD has systems and processes in place that assist programs when violations occur, including both providing concrete supports to address violations as well as processes to modify a program's license to provisional status or revoke a license in the case of serious offenses.

Quality

- §829(c)(2)(B) - The proposed legislation would remove public pre-K programs from participating in STARS, Vermont's quality recognition and improvement system for regulated child care and early learning 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.
- STARS is undergoing a redesign process that will streamline administrative processes and focus on recognized quality benchmarks such as teacher credentials and developmentally appropriate learning environments.
- Additionally, STARS is an 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 recommend that public pre-K programs continue to participate in STARS to ensure streamlined quality development and to utilize an existing tool that families are familiar with, allowing them to more easily compare and contrast pre-K options.

Availability of information about programs

- §829(c)(2)(A) and (B) Similarly, families need centralized resources for information. Most families of preschoolers are not accustomed to going to AOE's website to find information about early education programs. It seems very inefficient to have families go to two separate agencies' websites to try to compare options for their children. AHS is in the midst of developing a new IT system that should be able to provide families a user-friendly interface for searching for care. It would make much more sense for all UPK programs to be available to families through that platform.

Regulations that are duplicative for schools

- A large driver of this bifurcation proposal appears to be difficulties with duplicative regulations. Bifurcation is a disruptive approach to remedying this. Over the past year, representatives from CDD, public schools, the Vermont Department of Health, Vermont Department for Public Safety's Division of Fire Safety, and the Vermont Department for Environment Conservation's Drinking Water and Groundwater Protection Division have spent many hours walking through all of the regulations and identifying those that are problematic for public schools. There is a public comment period open right now for those rules, which should be going before LCAR in the next couple months. We recommend allowing these changes to go into effect instead of splitting the system.
- We strongly encourage you speak with one of the lead researchers from NIEER, Dr. Lori Connors-Tadros, to discuss successful administrative structures for pre-K, as she is currently working on a report related to this topic and she could offer insights as to how other states have navigated administrative challenges.

Public school program expansion

- 16 VSA §829(b)(4) As the committee has been discussing, good partnerships require more than just 30 days' notice that an expansion is happening. We are grateful that the committee is continuing to discuss how best to foster local conversations about possible impacts before a public school expands UPK offerings.

Program Qualifications/Teacher Qualifications

- 16 VSA §829(c)(1)(A)(ii) - Let's Grow Kids agrees that credentials and training of those working with young children is important. A national indicator of best outcomes for kids is teacher training and professional development, and moving towards a standardized qualifications across program settings will help Vermont to meet 2 out of 3 of the remaining, national benchmarks for high-quality pre-K programming that Vermont currently fails to meet: lead teacher qualifications and professional development.
- The intention of Act 166 was to move towards standardized credentials as there was increased investment in the system and more early educators available. We have heard loudly and clearly that we are not there yet.

- Other states that have created publicly-funded pre-K systems have also encountered this challenge. States that have navigated this successfully have allocated significant resources towards helping early educators obtain the necessary credentials at little to no cost and provided resources and programs to do so. Vermont MUST increase investments to support early childhood educators. We would recommend allowing 5 years for this change to take effect.
- We need to both support existing early childhood educators in furthering their education to meet increased standards AND recruit and retain new early childhood educators who meet the increased credential requirements.
- As Rep. Webb and others heard on your tours of pre-K programs, it's a big push go to from a bachelor's degree to teacher licensure, let alone from an associate degree to teacher licensure. Let's Grow Kids is working with the House Commerce & Economic Development Committee on small steps to support early childhood educators to achieve these credentials, but they won't be enough.
- We ask that you support House Commerce's work on bolstering the early education workforce and we recommend that your committee request a supply and demand analysis of UPK in Vermont, evaluating the number of current slots, the number of slots offered per session per program, the current number of early childhood educators that staff these programs, the estimated number of children not being served by the program, and, based on this information an estimate of the number of early educators that would be needed to meet demand for the program. This information will allow the state to explore concrete programmatic and policy solutions to support programs in having a sufficient workforce to meet increased teacher qualification requirements.
- As Vermont explores solutions, one additional opportunity may be to explore a rule change to allow the acceptance of teachers who hold a valid New York State early childhood education teaching license in addition to the 47 states with whom Vermont already holds teaching license reciprocity agreements.
- The last item we want to raise related to program qualifications is recommending that the proposed timeline for programs to notify AOE/AHS of changes that no longer make them compliant with UPK regulations be changed from 5 calendar days to 5 business days to recognize that both public and private programs need working days to determine if such a change can be rectified immediately and to allow for working administrative time to submit notification. For example, if change arose on a Thursday afternoon, that would only allow a program 2 businesses days to try to address the situation and 1 business day (Tuesday) to give notice.

Development of Uniform Forms and Processes

- Section 4 - Let's Grow Kids understands that navigating multiple contract and tuition payment systems has been challenging both for private and public programs, and we are generally supportive of the proposed changes.
- We do have a question related to the deadline for AOE to develop new forms and processes by October 31, 2020. Would this be for implementation for the 2021-2022 school year, or would these be used beginning in November 2020? If it's intended for

this fall, we would recommend pushing out to the following school year or requiring standardization to happen sooner.

UPK Regional Coordinators

- Based on the stories shared by families, experiences offered by private programs participating in UPK, and feedback shared by public programs, an element that stands out as critical to successful implementation to UPK seems to be whether public and private programs have access to a regional pre-K coordinator.
- However, not all public or private programs have access to a pre-K coordinator who can help to facilitate strong collaboration across settings, streamline program administration, and help families and programs navigate UPK successfully.
- Based on these experiences, we recommend that any proposed legislation include seed funding to incentivize the creation of at least 1 lead UPK coordinator in each of the 5 education regions in the state. The Winooski Valley Region developed a model that could be replicated in other regions.