



Date: Thursday, March 12, 2020  
To: House Committee on Human Services  
Testimony From: Sarah Kenney, Senior Director of Policy  
Re: H.935

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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. It's easy to get bogged down in the details of implementation obstacles and impacts on systems and administrators and lose sight of why we're actually doing this work – to ensure a strong start for all Vermont children and their families. Overall, Vermont is a national leader in the number of eligible children served by our UPK program, and that's something we should be proud of. Thousands of children across the state are accessing high-quality early education, which makes a difference for each of those children and their families and improves outcomes for our state as a whole. We must focus any changes to Act 166 on making sure that we're continuing to improve outcomes for children.

As the House Education Committee discussed at length, a central consideration in any changes to Act 166 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 must consider whether proposed changes set us on a path to efficiently and effectively expand the program in the future if need be; and whether any proposed changes set up the entire early care and education system to be successful in supporting the needs of children and families.

We at Let's Grow Kids, as well as many of our colleagues in PK-12 public education, use benchmarks from the National Institute for Early Education Research (NIEER) as a guide in our policy and programmatic work and we all agree that NIEER research should be driving policy changes. We may not agree on every detail of the bill, but we do agree that we should be working towards meeting all the benchmarks NIEER has identified as hallmarks of a high-quality prekindergarten system.

We'd like to offer the following comments on the specifics of the bill:

### **Definition of pre-K eligible children**

- §829(a)(1)(B) (page 2) - We appreciate the bill'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 Program

### Section 1

#### Bifurcation

- §829(e)(1) (page 12) - Let's Grow Kids is concerned with the proposal to bifurcate administrative and regulatory oversight of Vermont's UPK program. Separating oversight of the program is much more than a small "tweak" – it fundamentally changes Vermont's UPK program and has long-term impacts.
- Under current joint oversight, both the Agency of Education and the Agency of Human Services bring unique expertise and insight to the table. 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, and professional development.
  - 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 common-place in K-12.
- §829(e)(2)(H)(i)(I) (page 15) – Related to monitoring, it would be very challenging for AOE to create a new, separate system for monitoring health and safety standards for young children, especially given the current constraint on resources within AOE. The new monitoring system developed jointly by the agencies is very promising and should be allowed to be fully implemented. We cannot see how the new joint monitoring would work in a bifurcated system.
- Under current joint oversight, significant violations of health and safety regulations are noted through BFIS' public portal for both public and private programs. This helps to inform families and allows them to compare apples to apples. Additionally, CDD has systems and processes in place that assist programs when violations occur, including 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 violations.

#### Quality

- Quality recognition and improvement systems are considered a national best practice for state early care and learning systems, as are linking publicly-funded pre-K programming to state quality recognition and improvement systems. We appreciate that H.935 would continue to require all qualified programs – public and private – to participate in STARS.
- In addition to being national best practice, STARS is an important tool for family engagement. Under the STARS program, families are able to evaluate how all pre-K programs compare to one another on the same scale.

### Availability of information about programs

- (page 7 and 8) When searching for pre-K programs, families need centralized resources for information. Currently, information is available through CDD's Bright Futures Information System (BFIS) – the resource that families also use to search for child care. Most families of preschoolers are not accustomed to going to AOE's website to find information about early education programs. It is inefficient to force families to go to two separate agencies' websites to try to compare options for their children. We appreciate that the bill would have Building Bright Futures host a third repository of information, but this structure also seems inefficient. AHS is in the midst of developing a new IT infrastructure for BFIS that should be able to provide families an even more user-friendly interface for searching for care. It would make much more sense for information about all UPK programs to be available to families through that platform, which will provide a much broader range of information about programs that can be more easily compared on one website. We understand that this more efficient, centralized BFIS data source for all UPK programs would not be possible if oversight of public and private programs were bifurcated.

### 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 soon. We recommend allowing these changes to go into effect instead of splitting the system. We understand that the rules changes do not address all challenges, but they are an important start.

### Public and private program expansion

- 16 VSA §829(b)(4)(A) (page 4-5) – As the committee has discussed, good partnerships require as much advance notice as possible that an expansion is under consideration. We are grateful that the committee is continuing to discuss how best to foster local conversations about possible impacts before a public school or private program expands UPK offerings in their community.

## **Development of Uniform Forms and Processes**

- Section 4 (page 21) – 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.

## Program Qualifications/Teacher Qualifications

- Section 6 (page 22) – Let’s Grow Kids agrees that the credentials and training of those working with young children are important. A national indicator of best outcomes for kids is teacher training and professional development and moving towards 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 recommend moving over the next 5 years toward a requirement that all UPK instruction be provided by early educators with a license or endorsement in early childhood education or early special education, as long as this change is accompanied by significant investments in the workforce.
- 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 some of you heard on 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’s degree to teacher licensure. Let’s Grow Kids is working with the House Commerce & Economic Development Committee on smaller steps to support early childhood educators to achieve these credentials, but they won’t be enough this year.
- We support the report outlined in Section 6 of the bill; this is a critical conversation and we should be moving forward to support licensed teachers providing direct instruction with Act 166 funding.

## Pre-K Vision and Capacity

- Section 7 (page 26) – we agree that a guiding long-term vision is necessary before sweeping changes are made to Act 166. We would recommend that Building Bright Futures be involved in this process and that it be informed by the visioning work undertaken by the Blue Ribbon Commission on Financing High-Quality, Affordable Child Care and the Building Vermont’s Future from the Child Up Think Tank, as well as by the national best practice benchmarks set by NIEER. The vision should also be informed by input from parents/caregivers.

## Special Education Working Group

- Section 8 (page 26) – delivery of special education to pre-K students in programs outside of public schools in their home district has been a vexing issue since before the inception of Act 166, and there are still grave concerns about inequitable access to pre-K for students requiring special education. This is an issue that must be addressed. We are glad to see a working group proposed on this issue. We would recommend adding a representative from the Vermont Family Network as well as a family of a child who has received or needed special education services in order to participate in universal pre-K.

## UPK Regional Coordinators

- Section 9 (page 28) – Let's Grow Kids supports establishing a grant program to incentivize the creation of more regional pre-K coordinator positions across school districts.
- 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 of UPK seems to be whether public and private programs have access to a regional pre-K coordinator. Regional pre-K coordinators help to facilitate strong collaboration across settings, streamline program administration, and help families and programs navigate UPK successfully.