

## Act 58: Summarized Comments Received Before November 7, 2011

Act 58 tasked the commissioners of the Department of Education and the Department for Children and Families to collect input from the public on ways to simplify Act 62. The following chart summarizes the comments that were offered during a public meeting held on October 7<sup>th</sup> and in several written comments received before and after that public meeting.

<b>TOPIC: Community Needs Assessment</b>
<ul style="list-style-type: none"><li>• Community needs assessment is very time consuming, especially when we need to expand in order to maintain a 50/50 ratio of children receiving EEE services, and “typically developing” children when our EEE eligible population increases.</li><li>• Our community needs assessment provided us with a real opportunity to look at our community in a critical way.</li><li>• The community needs assessment has been an “awesome experience” although it is cumbersome it has immense value.</li><li>• There exists political tension between private and public entities that provide pre-K. I think the community needs assessment should not be about protecting funding for either party but focus on what children and communities need.</li><li>• VSBA strongly supports having each school board decide whether to offer pre-K or not.</li></ul>
<b>TOPIC: Partnerships</b>
<ul style="list-style-type: none"><li>• It’s up to the school districts as to whether to partner with a private provider or not. It seems that there are many more school-based pre-K programs than there are private providers of pre-K</li><li>• Burlington SD partners with 26 programs</li><li>• DOE and DCF leadership should understand that there are many private providers doing good work, as good as the school-based programs, but they’re doing it for much less money. But you can’t partner unless a school district decides to partner with you.</li><li>• We’re very happy with the “wonderful collaborations” we’ve developed. We have 8 private partners and 6 public education programs. Parents have options to choose from.</li><li>• Partnering isn’t just about the funding; it enables us to talk about kid’s needs and kindergarten transitions which have really improved during the past 4 years of our partnerships.</li><li>• When a private provider partners with multiple districts, they often have different forms to complete and different requirements. It can be very confusing and work intensive for the provider.</li><li>• Some districts have decided not to partner with private programs even though that was the intent of Act 62.</li></ul>
<b>TOPIC: Enrollment Process and “Counting”</b>
<ul style="list-style-type: none"><li>• Likes random selection process but concerned that at-risk children may not be included in pre-K</li><li>• Lack of alignment between parts of the enrollment process: (1) the random selection process, (2) the program’s acceptance of the child, and (3) confirmation of the child in the program as “pre-K”</li><li>• Random selection has been problematic for our partners who may have a long relationship with a family, but the child wasn’t selected and not eligible for funding.</li></ul>
<b>TOPIC: Program Standards</b>
<ul style="list-style-type: none"><li>• There are parts of STARS that are duplicative when a pre-K program is located in a school building. There’s already a nurse, licensed teachers, health and safety requirements, and specialized staff</li></ul>

(OT, SLP) to support children.

- It appears that public school pre-K programs are held to a higher standard since they need to comply with DOE regulations and DCF Early Childhood licensing regulations as well
- I didn't realize that licensing and STARS need to be completed annually (NB: STARS application is now a 3-year process with a brief annual update if anything has changed)
- Going through the STARS process has truly helped our program. The STARS coordinators were very accessible and helpful. (NB: These are school operated programs)
- Having an outside assessor do an Early Childhood Environment Rating Scale (ECERS) helped us improve our programs.
- STARS process also increased our planned family involvement and leadership activities.
- STARS has also made us think seriously about professional development for our para-educators.
- The financial incentive/reward helped us purchase supplies and classroom materials.

**TOPIC: Personnel Standards**

- DCF offers \$500 to help pay for Peer Review. It would be great if DOE could match that.
- There are too many loopholes for under-qualified teachers, family child care providers, and preschool programs. The original intent was that teachers would develop professionally rather than stop when they meet the minimums.
- Increase child care licensing professional development requirements to at least 15 hours per year and ensure that the trainings are balanced and not concentrated in a person's areas of interest.

**TOPIC: Finance**

- Comments from different people at DCF and DOE about "double dipping" when a child receives subsidy and also is counted as pre-K are confusing.
- Clarity about the use of public funds for program enhancement or for tuition reduction.
- The calculated costs using the Actual Costs template are often lower than the actual costs since the additional costs to maintain quality are program wide costs and should not be attributed to only the few "pre-K" children providers receive money for.
- Some districts pay a provider the amount of tuition charged in non-partnering programs that do not have the costs for maintaining the quality standards.
- Lack of alignment between timing of districts preparing their budgets, registering children (and knowing how many plan to attend), and confirming enrollments with providers.
- In small towns, when new families move in who have 3 and 4 year olds, the approved pre-K budget may require contracts with providers to be re-negotiated since the budget was didn't account for the additional children.
- Current averaging of ADM and the definition of pre-K as only 10 hours per week do not incentivize school districts to move in the direction of adding pre-K or of providing more extensive pre-K programs.
- Parents are not clear on how the district funds are used to discount their tuition since they don't see the full amount discounted. Also, they complain about programs using the district funds to discount the tuition costs of all children in their program. This practice alleviates the pressure on other districts not providing pre-K.
- Funding should be equitable and it shouldn't depend on where you live.
- If pre-K funds go to program enhancement and reduce support for children's tuition, then taxpayers funds are paying for children who do not reside in their town.
- One district continues to provide funding to private providers based on the average of children over the previous two years. This makes it difficult for the private provider to meet her current costs.

**TOPIC: General and Other Comments**

- Act 62 is very complex. There isn't necessarily a need to simplify, but to clarify certain aspects of the implementation of Act 62.
- Act 62 should benefit young children over the providers, both public and private.
- I'm concerned about Act 58's focus on simplification, it should be about improvements.
- Act 62 has largely handled the issue of access, now it's time to focus on quality.
- Research indicates that early education is a great investment. For every dollar spent, there is a \$13 return during the child's lifetime. High quality early education programs yield these positive outcomes.
- In Rutland South, only 50% of children entering kindergarten have had any type of preschool experience.
- If Vermont receives the RTT-Early Learning Challenge grant, I caution DOE and DCF to be carefully figure out how Act 62 interacts with ELC so that the resulting system won't be more complex and confusing.
- Vermont School Boards Association strongly supports the expansion of pre-K.
- Effective implementation of Act 62 depends upon relationships.
- Use a single child assessment rather than giving programs a choice (NB: This policy change has already been enacted.)