Some of the information shared at the last presentation for the Kirwan Workgroup 1 on July 12, 2018 related to the phase in of 4-year-olds and 3-year-olds at the 300% Federal Poverty Level (FPL) caused concern for our members and partners.

**PreK for 3 and 4-Year-Olds at 300% FPL – Phase-In**

The chart titled *PreK for 3 and 4-year-olds at 300% FPL* proposes a phase in starting in Fiscal Year (FY) 2021 that references a minimum of 10-percent of community-based programs serving the population. The Maryland State Child Care Association (MSCCA), as a member of the UPK Workgroup convened at the behest of the Kirwan Commission and legislatively mandated, stands behind the report generated by the UPK Workgroup suggesting 50% of community programs recommended for diverse delivery including center based, family child care, Head Start and religious programs (LOC’s).

MSCCA does not want child care businesses to close and/or increase the tuition for infants and toddlers because the four’s and low-income three’s will be leaving their programs to attend public PreK. The phase-in is not equitable and is not inclusive at a minimum of 10-percent because without requiring the minimum of 50-percent, many programs will be excluded and will lose their four’s and some three’s which will have a devastating financial impact.

If capacity building is necessary and we need both community settings and public settings to accomplish the goal of access and equity for voluntary UPK, by only penalizing the community-based settings with five years of phase will diminish capacity in community centers. Parents will have more choices in public settings and many businesses will not survive with little or no four’s and three’s in their programs.

Mandating 50-percent diverse delivery would be most equitable and create a level playing field for parents and private programs offering early childhood education (ECE). For example, Georgia’s public funded Pre-K program allowed students to enroll in either public or private preschools and the observed expansion of child care occurred in both public and private sectors. The majority of the participants in the publicly funded preschool program enrolled in public or private centers that were in operation before the new mandate took effect. West Virginia public Pre-K funds have specified mandates requiring HALF of all programs to partner...
with child care centers, private preschools or Head Start agencies in all 55 counties. Massachusetts has the best education ranking in the country and they do not have universal Pre-K. They have an expansion grant which covers more than 6.5 hours (Massachusetts covers the costs of wraparound care as well) and they allow time and waivers for programs to work their way through the QRIS system. Washington, D.C. has encountered backlash from their recent efforts to provide UPK and have had to make changes to increase the timelines for child care teachers to attain degrees. Lawsuits have also received national attention from the rush without better systems in place.

Center-based child care and non-public nursery schools are preparing children for kindergarten in Maryland. The Kindergarten Readiness Assessment (KRA) results over more than a decade show these prior care settings are successful. Since the new Ready for Kindergarten (R4K) testing assessment has changed from the former Maryland Model for School Readiness (MMSR), all prior care categories have decreased due to the many iterations of the assessment and the lack of full census. Both center-based programs and non-public nursery schools are still leading the way in preparing children for the next steps.

The at-risk, low income children are where efforts need to be focused to narrow the achievement gap. Maryland has been shamefully neglectful for more than a decade in providing public dollars through the child care subsidy system to families most in need of quality child care settings from birth to five. Maryland is ranked at the bottom of the country in child care subsidy reimbursement rates and the eligibility rates have not been addressed in over a decade as well. A family of three (two parents and one child or one single mom and two children) are only eligible for child care subsidy if they make $29,900 annually. If they make $1 over they do not qualify. The reimbursement rates are so low that many licensed, quality programs are not able to accept children with child care subsidy because they cannot afford to subsidize the state program. While Maryland is beginning to make long overdue increases, MSCCA is curious to review the KRA data as more children have access to quality child care programs.

**Additional Recommendations**

**Tracking Child Care Settings**

Tracking prior child care settings is also an issue. To accumulate accurate data and make informed decisions, Maryland needs to have a better system to track the programs children are attending before spending more dollars in other areas.

**Career Ladder/Phase-In Waivers**

For child care programs to prepare for UPK, they will need time and waivers like the Massachusetts PreK expansion grant applications. Programs participating in the EXCELS QRIS at Level 3 through Level 5 are not required to have degreed teachers.

Additionally, the Proposed MD ECE Career Ladder is suggesting four levels for ECE for two categories of age groups – Child Care serving zero to three and PreK serving three to five. MSCCA has concerns based on several observations and obstacles:

1. The research is not conclusive nor clear on whether children are more successful if the teacher has an associate degree in ECE/child development or a bachelor’s degree in ECE.
2. There are limited bachelor’s degree programs in ECE in Maryland and only one online.
3. Statistics provided by Montgomery College show that it takes a non-traditional student working 40-hours or more a week approximately nine years to complete the degree program at the community college level.
4. Teachers should be diverse like the students they teach. How will the career ladder impact women of color and diversity?
5. I do not see any alignment or recognition of the quality initiatives already in place in Maryland for high standards such as the state credentialing program for child care providers.
6. Maryland will need more colleges to allow the completion of CDA as college credit toward degrees.

More creative equivalencies, collaboration with colleges and universities and realistic timelines need to be established to implement a successful UPK system. The governance and oversight recommendations form the UPK Workgroup Report provided to Kirwan should be reviewed.

**MSDE Oversight and Governance of UPK**

MSCCA strongly advocates for oversight and governance of UPK through MSDE and not through local government. MSDE has a Division of Early Childhood and is an expert state agency in the field. Many public school systems do not have principals with early childhood education backgrounds. Additionally, local school boards are elected and if this is a state initiative, it should be governed by the expert state agency. Funding should come through MSDE and be distributed to both diverse delivery systems and local public schools.

**About MSCCA**

*The Maryland State Child Care Association (MSCCA) is a non-profit, statewide, professional association incorporated in 1984 to advocate for our members and to promote the growth and development of child care learning centers in Maryland. We have 10 Chapters in Maryland and represent membership in Baltimore City, as well as 23 counties. MSCCA has over 3000 members and our members provide care and learning for more than 12,000 children therefore supporting over 20,000 working parents. We believe children are our most important natural resource and work hard to advocate for children, families and for professionalism within the child care and early learning community.*