

## Compilation of Individual Stakeholder Input Related to Proposed RI Department of Elementary and Secondary Education (RIDE) High Quality Early Childhood Education (ECE) Standards - 12-2-08

**Overview** - The RI Department of Elementary and Secondary Education (RIDE) has invited individual written comments on Proposed RI Department of Elementary and Secondary Education (RIDE) High Quality Early Childhood Education (ECE) Standards during Fall 2008. The following presents these comments provided by 9 individuals.

**Overall Comments** - The following comments were provided that we not specific to particular sections of the Standards.

1. I was pleased to see that there is a revision to the current regulations being considered. Existing regulations are not in line with current practices and changes in the education field. An emphasis on play, interactions and accountability are welcome changes. Unfortunately, I was disheartened by many of the proposals. Most early childhood settings have little or no surplus in funding. This is particularly true since the DCYF application fee increased 500% and yet the reimbursement rates are reduced.

Additional tuition increases would severely impact families who currently are struggling to meet rising costs. Significant increases would be required to implement some of the proposals such as:

- Provide a minimum of 2 hours paid time per week
- Institute an assessment process
- Hire degreed teachers and assistants with a CDA or equivalent
- Disallow administrators from teaching

I could not increase tuition enough to offset the costs of these recommendations. While there are ideal expectations and would be welcome in any setting, they would only insure that many existing programs would soon be out of business.

*- Then the commenter provide specific feedback on Standards 5 and 8 that cited under these standards later in this document.*

Unfortunately, I am unable to attend the forum this month and I also do not feel the questionnaire effectively solicits the feedback which is warranted.

2. I like the framework and the fact that RI is setting high standards for our children, which they deserve. My concerns are with the cost end. Can parents afford to pay higher tuition rates? Teachers with degrees and certifications are going to be wanting higher pay. Have there been any thoughts of how to work this issue out? Is there an outlook to possibly adding Pre-K to the public schools systems? As the early years are so important!

### Comments on First Two Sections of Standards Document

**Applicability** - Standards shall apply to early childhood education programs in order to ensure developmentally appropriate early development and learning experiences based on Rhode Island's Early Learning Standards to children between the ages of three (3) to six (6) years of age. These standards shall also pertain to kindergarten classrooms operating in private programs in which kindergarten is the terminal grade. As a prerequisite of applying for approval, applicants must be either:

- A Child Day Care Center, Family Child Care Home, or Head Start Program licensed by the State of Rhode Island Department of Children, Youth and Families OR

- A program housed in a facility that meets physical facility requirements of the RI Department of Elementary and Secondary Education

Thus, these standards do not address issues already addressed through these prerequisite requirements. This particularly impacts health and safety, facilities and related issues. That is, the enclosed standards address health and safety, facilities and related issues that go beyond the degree specified in the prerequisite requirements.

Question: Do you consider this appropriate? \_\_\_ No (not at all) \_\_2\_ Somewhat: \_\_3\_ Yes (to a satisfactory level).

Comments:

1. My program in not regulated by RIDE. We meet requirements of DCYF regulations.
2. What governmental rule (state/federal)? Issues already addressed? Aren't DCYF regulations undergoing revision as well and how can RIDE DCYF base their standards of each other with no clarity?
3. Does this take precedence over a program that is accredited? Why only 6 hours for programs that are longer than 6 hours?

**The Approval Process** - The process outlined in these standards is essentially the same as that has been in place for many years. Once these standards are adopted, application forms, required documentation and protocols for on-site visits by an authorized representative designated by the Commissioner will be developed in alignment with these standards.

Question: Do you consider this appropriate? \_\_\_ No (not at all) \_1\_\_ Somewhat: \_5\_\_ Yes (to a satisfactory level).

Comments:

1. For RIDE certified facilities only?
2. I am concerned about being given adequate time to get "ducks in a row" before this goes into effect. What the cost will be and funding. Will a grant be for Department of Education to keep this going.

**Comments on Standards:** Participants responded to the following 5 questions using a rating scale and provided comments related to each of the five standards.

<p><u>Question 1:</u> Is standard understandable to any reasonably knowledgeable ECE professional?</p>	<p><u>Question 2:</u> Is standard specific enough that any person knows what is to be done and what is not to be done?</p>	<p><u>Question 3:</u> Is standard enforceable, in that the indicators are generally capable of measurement?</p>	<p><u>Question 4:</u> Is standard consistent with evidence-based effective practice for high quality ECE programs?</p>	<p><u>Question 5:</u> Is standard adequately comprehensive in scope?</p>
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**Standard 1: Physical Facilities**

<b>1: Under-standable</b>	<b>2: Specific what is/is not to be done</b>	<b>3: Enforce-able, can be measured</b>	<b>4: Consistent evidence-based practice</b>	<b>5: Adequately comprehensive</b>	<b>Comments</b>
<p>No (not at all)</p> <p>Somewhat</p> <p><b>Yes (to a satisfactory level) - 7</b></p>	<p><b>No (not at all) - 1</b></p> <p><b>Somewhat - 2</b></p> <p><b>Yes (to a satisfactory level) - 4</b></p>	<p><b>No (not at all) - 1</b></p> <p><b>Somewhat - 3</b></p> <p><b>Yes (to a satisfactory level) - 3</b></p>	<p>No (not at all)</p> <p><b>Somewhat - 1</b></p> <p><b>Yes (to a satisfactory level) - 6</b></p>	<p>No (not at all)</p> <p><b>Somewhat - 3</b></p> <p><b>Yes (to a satisfactory level) - 4</b></p>	<ul style="list-style-type: none"> <li>• Cleaning at night - costly!!</li> <li>• Spacing DCYF tells us amount of children allowed in center. Why should you tell us less?</li> <li>• Due to building structure and fire code, some things cannot be changed. Will there be variances for that?</li> <li>• There should be clauses built in or ratings for buildings that are grandfathered in.</li> <li>• Grandfathered in?</li> <li>• Need help in improving.</li> <li>• All licensed child care facilities with Preschool-Pre-K classrooms on second floor should not be eliminated or precluded from a RIDE license. We note that this is not on the draft version of the standards but the existing standards make mention that the program "should" be on the first floor.</li> <li>• <b>1.2</b> Classroom definition: Considerations should be made for the classroom philosophy and concept of "open classrooms".</li> <li>• <b>1.2</b> Divider height - My center purchased 4 ft. dividers. Is their flexibility on height?</li> <li>• <b>1.2</b> Partition height 5 feet is too high. This should be reconsidered - 4 foot preference.</li> <li>• <b>1.8</b> For all programs which are already running and licensed through DCYF can request a variance through DCYF if bathroom facilities are not on the same floor or within 40 feet of the classroom.</li> </ul>

**Standard 2: Health and Safety**

<b>1: Under-standable</b>	<b>2: Specific what is/is not to be done</b>	<b>3: Enforce-able, can be measured</b>	<b>4: Consistent evidence-based practice</b>	<b>5: Adequately comprehensive</b>	<b>Comments</b>
No (not at all)	<b>No (not at all) - 1</b>	<b>No (not at all) - 1</b>	No (not at all)	No (not at all)	<ul style="list-style-type: none"> <li>• Related to "somewhat" rating for question #2, more guidelines need to be developed around issues with asthma.</li> <li>• What are exception to the "rule"?</li> <li>• <b>2.7</b> There should be at least two people certified for CPR/ First Aid in the facility at all times.</li> <li>• <b>2.9</b> Could be too much information for staff.</li> <li>• <b>2.9</b> In regards to the mention of "disposable paper towel", we should be sensitive to the environment and "green" programs to use recyclable or re-usable alternatives in an ongoing effort to live in a more sustainable environment.</li> </ul>
<b>Somewhat - 1</b>	<b>Somewhat - 1</b>	<b>Somewhat - 1</b>	Somewhat	<b>Somewhat - 1</b>	
<b>Yes (to a satisfactory level) - 6</b>	<b>Yes (to a satisfactory level) - 5</b>	<b>Yes (to a satisfactory level) - 5</b>	<b>Yes (to a satisfactory level) -7</b>	<b>Yes (to a satisfactory level) - 6</b>	

**Standard 3: Children's Age Requirements**

<b>1: Under-standable</b>	<b>2: Specific what is/is not to be done</b>	<b>3: Enforce-able, can be measured</b>	<b>4: Consistent evidence-based practice</b>	<b>5: Adequately comprehensive</b>	<b>Comments</b>
No (not at all)	<b>No (not at all) - 1</b>	No (not at all)	No (not at all)	No (not at all)	<ul style="list-style-type: none"> <li>• We agree that ratios should be the same and consistent with DCYF classroom ratios.</li> </ul>
Somewhat	Somewhat	Somewhat	Somewhat	Somewhat	
<b>Yes (to a satisfactory level) - 7</b>	<b>Yes (to a satisfactory level) - 6</b>	<b>Yes (to a satisfactory level) -7</b>	<b>Yes (to a satisfactory level) -7</b>	<b>Yes (to a satisfactory level) -7</b>	

**Standard 4: Staff-Class Sizes, Staff Adult/Child Ratios**

<b>1: Under-standable</b>	<b>2: Specific what is/is not to be done</b>	<b>3: Enforce-able, can be measured</b>	<b>4: Consistent evidence-based practice</b>	<b>5: Adequately comprehensive</b>	<b>Comments</b>
<p>No (not at all)</p> <p><b>Somewhat -2</b></p> <p><b>Yes (to a satisfactory level) -5</b></p>	<p>No (not at all)</p> <p><b>Somewhat -3</b></p> <p><b>Yes (to a satisfactory level) -4</b></p>	<p>No (not at all)</p> <p><b>Somewhat - 3</b></p> <p><b>Yes (to a satisfactory level) - 4</b></p>	<p>No (not at all)</p> <p><b>Somewhat -2</b></p> <p><b>Yes (to a satisfactory level) - 5</b></p>	<p>No (not at all)</p> <p><b>Somewhat - 3</b></p> <p><b>Yes (to a satisfactory level) - 4</b></p>	<ul style="list-style-type: none"> <li>• The idea of one qualified teacher per classroom is a good one but unrealistic if RIDE is not planning on subsidizing the cost of these teachers.</li> <li>• Teacher: having one qualified teacher in each classroom is cost prohibitive; not to mention that the available employee pool with the necessary degree is not that large. The regulations per DCYF regarding Head Teachers are sufficient per facility.</li> <li>• Maintaining student/child ratio at all times: This should be consistent with DCYF regulations and also it should be noted that there are cases of emergency where allowances must be made.</li> <li>• My concern - Staying in ratio during staff lunches. Staff technically not counted but on break in staff room.</li> <li>• <b>4.1</b> Kindergarten Ratios: Ratios should be consistent between both private and public schools; there should be no differentiation between the two.</li> <li>• <b>4.2</b> 20%?</li> <li>• <b>4.6</b> Is this possible?</li> </ul>

**Standard 5: Staff Qualifications and Requirements for Ongoing Professional Development**

<b>1: Under-standable</b>	<b>2: Specific what is/is not to be done</b>	<b>3: Enforce-able, can be measured</b>	<b>4: Consistent evidence-based practice</b>	<b>5: Adequately comprehensive</b>	<b>Comments</b>
<p>No (not at all)</p> <p><b>Somewhat -1</b></p> <p><b>Yes (to a satisfactory level) - 5</b></p> <p><b>1 respondent didn't rate at all</b></p>	<p>No (not at all)</p> <p><b>Somewhat -2</b></p> <p><b>Yes (to a satisfactory level) - 4</b></p> <p><b>1 respondent didn't rate at all</b></p>	<p><b>No (not at all) - 1</b></p> <p><b>Somewhat -2</b></p> <p><b>Yes (to a satisfactory level) - 3</b></p> <p><b>1 respondent didn't rate at all</b></p>	<p>No (not at all)</p> <p><b>Somewhat -2</b></p> <p><b>Yes (to a satisfactory level) - 4</b></p> <p><b>1 respondent didn't rate at all</b></p>	<p><b>No (not at all) - 1</b></p> <p>Somewhat</p> <p><b>Yes (to a satisfactory level) - 5</b></p> <p><b>1 respondent didn't rate at all</b></p>	<ul style="list-style-type: none"> <li>• 4 core competencies? Professionally prepared? Too much information!</li> <li>• Again, who can cover the cost?</li> <li>• Respondent who didn't rate this standard said...! <u>like the requirements</u> but I do have concerns about private centers being able to pay higher salaries for degree people. <u>Can parents afford more tuition?</u> Does the state plan to help fund teacher salaries for degree/ certified teachers?</li> <li>• Qualifications are absolutely not feasible for private settings. To require all staff to be working towards a degree isn't appropriate. CDA should be adequate. Funds are not there to pay master/ BA level to all staff unless the state is planning on subsidizing private settings.</li> <li>• Need the highest expectations for our teachers. *important*</li> <li>• The RI Early Learning Standards are an excellent tool; however, we should be sensitive to the fact that there are different philosophies of curriculum in each program which should be considered. Comparable research based standards can be substituted with college classes, online trainings and conferences.</li> <li>• I am particularly uncomfortable with the criteria for teachers and assistants. It raises the issue of whether or not I need to layoff teachers who have been with me for 17 years. Very few certified teachers currently remain in a private center. We compete with public and independent schools for certified staff as is. It is a cost prohibitive and unrealistic requirement.</li> </ul>

**Standard 6: Administration**

<b>1: Under-standable</b>	<b>2: Specific what is/is not to be done</b>	<b>3: Enforce-able, can be measured</b>	<b>4: Consistent evidence-based practice</b>	<b>5: Adequately comprehensive</b>	<b>Comments</b>
<p>No (not at all)</p> <p><b>Somewhat - 1</b></p> <p><b>Yes (to a satisfactory level) - 6</b></p>	<p>No (not at all)</p> <p><b>Somewhat - 1</b></p> <p><b>Yes (to a satisfactory level) - 6</b></p>	<p><b>No (not at all) - 1</b></p> <p><b>Somewhat - 1</b></p> <p><b>Yes (to a satisfactory level) - 5</b></p>	<p><b>No (not at all) - 1</b></p> <p>Somewhat</p> <p><b>Yes (to a satisfactory level) - 6</b></p>	<p><b>No (not at all) - 1</b></p> <p>Somewhat</p> <p><b>Yes (to a satisfactory level) - 6</b></p>	<ul style="list-style-type: none"> <li>• Cost - Coordinator + Qualified Teachers + Administrator = ?\$</li> <li>• I like the idea of having an Early Childhood Coordinator. Could this be a half-time or shared position in a medium-size center?</li> <li>• Early Childhood Coordinator should not be a required position. If it must be, for programs with more than 4 classrooms, the ECEC should be allowed to have direct teaching responsibilities. Again, unless the state is going to provide the funding to support this position.</li> <li>• Need the highest expectations for our teachers. *important*</li> <li>• <b>6.10</b> Paid Planning Time Per Classroom: This should be up to each individual employer to devise their own policy as it relates to planning time.</li> </ul>

**Standard 7: Curriculum**

<b>1: Under-standable</b>	<b>2: Specific what is/is not to be done</b>	<b>3: Enforce-able, can be measured</b>	<b>4: Consistent evidence-based practice</b>	<b>5: Adequately comprehensive</b>	<b>Comments</b>
No (not at all)  <b>Somewhat - 1</b>  <b>Yes (to a satisfactory level) -6</b>	<b>No (not at all) - 1</b>  <b>Somewhat - 2</b>  <b>Yes (to a satisfactory level) -4</b>	No (not at all)  <b>Somewhat - 3</b>  <b>Yes (to a satisfactory level) -4</b>	No (not at all)  <b>Somewhat</b>  <b>Yes (to a satisfactory level) -7</b>	No (not at all)  <b>Somewhat - 2</b>  <b>Yes (to a satisfactory level) -5</b>	<ul style="list-style-type: none"> <li>• How is an evaluator from Providence going to be capable of measuring curriculum specifically designed for children from families in rural RI?</li> <li>• Related to "somewhat" rating for question #2, depends on level or training each teacher has had!</li> <li>• Funding for workshops/ trainings - will be offered by state level, e.g., RIELS trainings?</li> <li>• Given the current levels of education of teachers, are these attainable standards? What if we were able to provide educational funding for teachers, who should pay?</li> </ul>

**Standard 8: Child Assessment**

<b>1: Under-standable</b>	<b>2: Specific what is/is not to be done</b>	<b>3: Enforce-able, can be measured</b>	<b>4: Consistent evidence-based practice</b>	<b>5: Adequately comprehensive</b>	<b>Comments</b>
No (not at all)  <b>Somewhat - 1</b>  <b>Yes (to a satisfactory level) -6</b>	No (not at all)  <b>Somewhat - 2</b>  <b>Yes (to a satisfactory level) -5</b>	No (not at all)  <b>Somewhat - 3</b>  <b>Yes (to a satisfactory level) -5</b>	No (not at all)  <b>Somewhat</b>  <b>Yes (to a satisfactory level) -7</b>	No (not at all)  <b>Somewhat</b>  <b>Yes (to a satisfactory level) -7</b>	<ul style="list-style-type: none"> <li>• Related to "somewhat" rating for question #2, depends on type or level of training.</li> <li>• Again, education of the teachers seems to be a key component in this area.</li> <li>• The assessment procedure is not clear. Currently, a portfolio system if done properly should provide evidence of development or concerns. As a speech and language pathologist who spent years studying and becoming certified in various assessment tools, I feel a blanket assessment process requires more study. There are also resources available for assessment or diagnostic measures which are available to any parent or center with a referral.</li> </ul>

**Standard 9: Differentiated Teaching and Learning**

<b>1: Under-standable</b>	<b>2: Specific what is/is not to be done</b>	<b>3: Enforce-able, can be measured</b>	<b>4: Consistent evidence-based practice</b>	<b>5: Adequately comprehensive</b>	<b>Comments</b>
No (not at all)	No (not at all)	No (not at all)	No (not at all)	No (not at all)	<ul style="list-style-type: none"> <li>Related to "somewhat" rating for question #2, depend on training.</li> </ul>
Somewhat	<b>Somewhat - 2</b>	Somewhat	Somewhat	Somewhat	
<b>Yes (to a satisfactory level) -7</b>	<b>Yes (to a satisfactory level) -5</b>	<b>Yes (to a satisfactory level) -7</b>	<b>Yes (to a satisfactory level) -7</b>	<b>Yes (to a satisfactory level) -7</b>	

**Standard 10: Family Engagement**

<b>1: Under-standable</b>	<b>2: Specific what is/is not to be done</b>	<b>3: Enforce-able, can be measured</b>	<b>4: Consistent evidence-based practice</b>	<b>5: Adequately comprehensive</b>	<b>Comments</b>
No (not at all)	No (not at all)	<b>No (not at all) - 1</b>	No (not at all)	No (not at all)	<ul style="list-style-type: none"> <li>Parents are unable to be contacted sometimes!</li> </ul>
<b>Somewhat - 1</b>	<b>Somewhat - 1</b>	<b>Somewhat - 2</b>	<b>Somewhat - 1</b>	<b>Somewhat - 1</b>	
<b>Yes (to a satisfactory level) -6</b>	<b>Yes (to a satisfactory level) -6</b>	<b>Yes (to a satisfactory level) - 4</b>	<b>Yes (to a satisfactory level) -6</b>	<b>Yes (to a satisfactory level) -6</b>	