Name/Organization	Topic/Comments
Laura Perille, Nurtury Early Education	I am writing to share constructive feedback regarding the Early Education and Out-of-School Time (EEOST) grant process, from the perspective of a current (and hopefully future) early education EEOST grantee. The particular focus of this testimony is on the accessibility of the current grant process, which causes challenges for grantees of all sizes and, in turn, can create equity issues for providers of different budget sizes and financial status. In particular, I want to advocate for easier access to capital improvement grants for all providers, and most notably, for family child care providers, who are independently-licensed, home-based small business owners and entrepreneurs providing vital child care services. I want to start with thanks for the very presence of the EEOST grant program and the availability of funds for desperately-needed facility improvements for early education programs. In particular, I want to thank EEC and the administration for allowing during the pandemic and continuing today smaller ($500,000 or less) capital grants for renovations and repairs, in addition to the original larger grants for major renovations and new builds. Continued investment is needed at all levels, and we are grateful to the Governor, the Legislature, and EEC administration for prioritizing this funding. My feedback focuses on the accessibility of these funds for providers. As EEC and the administration explore strategies to support child care capital improvements, I strongly encourage a review and reconsideration of administrative requirements and bureaucratic hurdles that make the current EEOST grant process and structure onerous and challenging for providers. While I understand and respect that these requirements are meant to ensure the safety and best practices of such grants, as EEC seeks to make more capital funds available, I hope that the administration will consider "right-sizing" or balancing the heft of these administrative requirements with the scale and mission of the smaller grants in particular. I highlight three areas of feedback for your consideration: 1. Cost reimbursement basis: Because EEOST awards are cost-reimbursement grants, the grantee must pay for improvements up front, or organize the repairs in phases, which can add considerable delay and cost to the process. This places a financial burden on grantees that can be prohibitive for cash-strapped providers and in particular for smaller organizations. 2. Lengthy post-grant award process: EEOST applications are complex to begin with, and that continues post-award. Together with the cost reimbursement structure, the detailed and lengthy post-grant review process requires submission of multiple documents and administrative review before funds are improved for reimbursement. My organization was awarded a $250,000 capital renovation grant for HVAC and window replacement for one early education center in June 2022, after applying in December 2021. After following all of the steps for engineering

	reviews and multiple bids, we were able to complete 75% of the work in April 2023 and the remainder of work in Summer 2023. We had to use all of our own funding up front to pay deposits and execute these repairs, and we have not yet received approval for *any* reimbursement as of September 2023. This timeline presents a huge burden for mission-driven organizations of any size, and in particular for smaller organizations that are not able to provide all of the up-front cash prior to reimbursement. 3. Legal review: As we went through the EEOST grant execution process, we learned that 1-3 grant closing meetings were required, with lawyers present for both the grantee and EEOST, and that the grantee was responsible for paying for both lawyers and all legal costs. While grant funds can be used for this expense, this further reduces the funds available for actual capital expenses. In thirty years of fundraising, this is unlike any process I have seen for grants. While this requirement may be unique to public capital grants, I hope you will consider reviewing whether it is truly necessary for smaller grants. Again, I want to underscore my gratitude for the availability of these grants, as well as my respect for careful stewardship of these funds. As I have learned from many of my early childhood peers, these regulations and procedures were put into place for much larger grants ($1-3Million) for new construction and major renovations. I hope you will review whether all of these steps truly are necessary for smaller renovation grants - and whether they create accessibility and equity barriers which are not in keeping with the mission or purpose of the grant program. If the EEOST regulations cannot be amended or administrative review procedures cannot be streamlined, then I urge EEC to explore alternative vehicles for making a range of capital improvement funds to expand accessibility for ECE programs of all shapes and sizes.
Darling Ortiz, Laura Callender, Rosalina Pinto, and Margaret McDonald, Clarendon Early Education Services	Re: 606 CMR: DEPARTMENT OF EARLY EDUCATION AND CARE 606 CMR 7.00: STANDARDS FOR THE LICENSURE OR APPROVAL OF FAMILY CHILD CARE; SMALL GROUP AND SCHOOL AGE AND LARGE GROUP AND SCHOOL AGE CHILD CARE PROGRAMS Tuesday, October 10, 2023 Dear Chair Belsito, Vice Chair Moeller, Secretaries Tutwiler and Walsh, Commissioner Kershaw and Board Members: Thank you for this opportunity to come before you today. My name is Darling Ortiz, I work with Clarendon Early Education Services, Inc. A Family Child Care System providing a full suite of business and professional development supports to 181 affiliated Family Child Care Educators across the state. I am a home Visiting Support Specialist dedicated to our FCC educators in and around the Boston area. I would like to take this opportunity to thank Commissioner Kershaw and her team at EEC for this past year's work on revision of the Financial Assistance regulations, policies and procedures. This monumental undertaking was launched by the Department with the intent to remove barriers in accessing childcare that parents have historically had to navigate and we believe that we will soon see a great deal of success in achieving the desired result.

	I am here today to recommend that the Department is granted similar authority to now undertake a very long overdue comprehensive review of Child Care Licensing regulations. In my role, I provide educators with technical assistance in interpretation and application of the Regulations on a daily basis. Having more than 25 years of experience working in the field, I can testify to you that there are many areas of the regulations that are unclear and often open to differing interpretations. Group sizes and definitions of Kindergarten and School Age children as they pertain to ratios and supervision are an example of a very important section of the regulations that could be evaluated to reduce confusion across different program types. There are also sections of the regulations that can impede a child's immediate access to care. One example is the requirement for the educator to obtain a certificate of immunization at admission while having 30 days from enrollment to obtain a physical statement. 606: CMR 7:04 (7) Children's Records. The licensee must maintain an individual written record for each child that includes: (a) Information required at admission, including 13. Medical records, including: a. a physician's, nurse practitioner's, or physician's assistant's certification that the child has been successfully immunized in accordance with the current Department of Public Health's recommended schedules; b. a written statement from a licensed health care practitioner within one month of admission that indicates that the child has had a complete physical examination within one year prior to admission; I thank you for your time today and for your leadership in in the very important work that EEC and the field are engaged in to ensure the health, safety and education of young children in Massachusetts.

MASSACHUSETTS
HEAD START ASSOCIATION

Public Comment to the Board of the Department of Early Education and Care
October 11, 2023

Thank you for the opportunity to deliver public comment today regarding the upcoming licensing regulatory changes. My name is Michelle Haimowitz, and I am the Executive Director of the Massachusetts Head Start Association (MHSA).

MHSA is a membership organization that represents the 28 Head Start and Early Head Start Programs in Massachusetts. Head Start is a federal grant program that provides early education and comprehensive child and family services, including health, mental health, nutrition, and family leadership and resources to vulnerable children and families. Federal Head Start grants are provided from the federal government directly to each of the nation's 1,600 grant agencies, including 28 here in Massachusetts. Collectively, these 28 programs serve more than 10,000 children from birth to age five. Head Start eligible children are among the most vulnerable in our Commonwealth; Head Start serves children from families earning under the Federal Poverty Level, children experiencing homelessness, and other very vulnerable children at no cost to the family.

Of the 28 Head Start and Early Head Start agencies in Massachusetts, 23 agencies operate EEC licensed centers. As the Department begins its review of licensing regulations, Head Start is a ready partner at the table. We are grateful for our ongoing partnership with the Department, Commissioner Kershaw, and the Head Start State Collaboration Office and its Director Amy Whitehead-Pleaux. We are glad to be at the table with our Department partners in response to various regulatory changes and improvements and work closely together to best support vulnerable families and the programs that serve them. We offer this testimony as a launching pad to what we know will be many conversations, focus groups, and revisions ahead.

As this Board considers the licensing system over the coming months, we ask you to keep Head Start programs and their experience with licensing in mind. As I shared, Head Start programs that operate in Group and School Age settings are required to go through licensing in Massachusetts. We believe that participation in licensing is fundamental to health and safety. In addition to Massachusetts licensing, Head Start programs are heavily monitored by the federal Office of Head Start. Head Start agencies are awarded five-year grants and their lengthy applications are reviewed at the start of their grant and during annual continuation applications. During the five-year grant, programs receive a week-long virtual review as well as a week-long in-person intensive review, both with a team of objective and trained monitors. Programs are also reviewed on classroom quality using the Classroom Assessment Scoring System, or CLASS. In addition, the Office of Head Start conducts unscheduled reviews as needed, during the typical monitoring schedule or in response to events in the program.

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MASSACHUSETTS
HEAD START ASSOCIATION

Head Start programs are well-monitored as well as well-regulated. The Head Start Act and the Head Start Program Performance Standards, Head Start's governing statute and regulations, closely dictate program facilities, ratios, staff qualifications, privacy procedures, and more. Head Start programs are required to wholly comply with federal regulations and policies and are monitored on their adherence, as described above.

Under the current licensing regulations, Head Start programs are licensed and monitored in the same manner as non-federally regulated programs. This process often results in duplication, requiring Head Start programs to submit documentation to the Department that has already been monitored by the federal government or receive monitoring visits for the same need. We look forward to working closely with the Department in the coming months to rebuild a licensing regulatory environment that continues to prioritize child health and safety and that reduces duplication and burden for our federally regulated Head Start and Early Head Start programs. Thank you.

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Massachusetts Afterschool Partnership (MAP) Memo to Department of Early Education and Care (EEC)

Re: Licensing Regulations for School Age Providers

5/31/2023

The Massachusetts Afterschool Partnership (MAP) is submitting the below recommendations to changes to EEC licensing regulations:

606 CMR 7.00 - STANDARDS FOR THE LICENSURE OR APPROVAL OF FAMILY CHILD CARE; SMALL GROUP AND SCHOOL AGE AND LARGE GROUP AND SCHOOL AGE CHILD CARE PROGRAMS.

The Massachusetts Afterschool Partnership (MAP) is a statewide non-profit dedicated to helping young people get the critical services they need during out-of-school time. Through listening sessions, on-the-ground and virtual site visits, surveys, and many conversations with program providers, MAP has collected feedback on ways in which EEC's regulations may be streamlined and improved for school age programs.

MAP offers the below recommendations as a starting point to help ensure youth serving programs that fall under EEC's regulatory supervision are fully supported in the deep and diverse work they do. MAP is excited to work further with EEC to support school and community-based programs in providing equitable access to high quality afterschool services for our children and youth who need it most.

Short Term Recommendations

1: Create a School Age Licensing Guide for New Users

Current regulations (606 CMR 7.00) are confusing and difficult to read. EEC should create a new and separate document that outlines exactly what is required of school age providers. Currently, school age licensing is embedded alongside regulations for center based childcare and family childcare. A new document could eliminate confusion for individuals or organizations looking to create a school age afterschool program. This new document should remove all mention of regulations pertaining to non-center based school age care. By simply reiterating the current regulations as written in 606 CMR 7.00, EEC would limit barriers to providers who may feel intimidated and/or confused by the current wording and support quality improvement for the school age sector.

Examples:

- 606 CMR 7:02: Definitions: This section provides definitions for items that are not relevant to a school age provider including *Family Child Care System, Infant*, *Household Member*, etc.

2: Reduce Barriers to Employment at School Age Programs

Current school age regulations erect barriers to employment and discourage a specialized and unique workforce. School age afterschool programs struggle to hire and retain staff. This is true across the education ecosystem, but school age programs struggle with factors unique to the field. The afterschool workforce is comprised of employees/youth development workers at various career junctures (e.g., school day teachers looking to supplement their income or college students who are home from school). Out-of-school time programs generally provide working hours from 3-6 p.m. during the school-year and full-time only during summers, making it difficult to retain employees who need full-time work. This has led to higher rates of turnover within the school age environment. Providers are often forced to pull in administrators to meet ratio or limit the number of children served, ultimately reducing access for high-needs children and youth.

Another challenge often facing the school-age workforce is the requirement to be fingerprinted for both school day (under DESE) and school age afterschool (under EEC). The fingerprinting process is costly and time consuming and often leads to employable professionals choosing different work. Many school age providers find it difficult to hire bus drivers (7D) due to redundant regulations between the MA RMV and EEC especially for programs that serve children on EEC financial aid – both processes requiring a CORI.

Despite these challenges, there are opportunities to bolster school age quality through changes in the regulations around employment to allow for more caring adults to help keep kids safe. Many school age providers often bring in specialists with unique content knowledge to give instruction, in content areas such as STEM or health and wellness. **These specialists should be certified within the EEC system through alternative routes and count towards a provider's ratio requirements while at the school age site.**

Examples

- 606 CMR 7:09 Educator Qualifications and Professional Development (16); (17): These sections outline additional requirements for school age professionals to be qualified to work in a school age program. The regulations should include provisions for a school age provider to be able to submit alternative orientation and evaluation plans for non-traditional staff and get future employees preliminary licenses.

3: Support Positive Community Relationships and Partnerships

Current school age regulations add conditions which may strain relationships with vital community stakeholders. School age afterschool providers operate in both the early education and school day communities and work with other entities such as local Parks and Recreation departments, libraries, museums, and schools. EEC should support providers in developing positive relationships and partnerships with both communities to ensure continuum of care for kids. Current EEC regulations can cause friction between the school age provider and potential partners, including schools. School age providers are often in the position to request building inspection reports from schools or tell schools that their playgrounds don't meet safety standards. These barriers may prevent a school or community based school age programs from using a public building that is well suited for an afterschool program, leaving the building empty and children without care. Reducing these barriers would also limit transportation needs for school age programs and support working families.

Examples:

- 606 CMR 7:07 (2) Building Inspection: School age providers must provide proof of certificate of inspection from the Department of Public Safety or the local building inspector certifying that the facility complies with the applicable 780 CMR: The Sate Building Code. Many providers find this process confusing and difficult. EEC should work with the Department of Elementary and Secondary Education (DESE) or any applicable local or state department to provide a method for providers to use space that is already in use by school age youth during the school day.

- 606 CMR 7:07 (16) (e) Playground Safety: A child who uses the playground during the school day may not be able to use the same playground while in an afterschool program. EEC should allow school age providers to allow parents to waive liability for kids who use the playground during both times of day.

- 606 CMR 7.07(16)(c)1 - Space Requirements - Space regulations can cause problems with capacity. Not all activities require as much space and there should not be a one sized space requirement. We do not think there needs to be specific space regulations per room but that programs have flexibility to use the space for an appropriate number of children based on the activity provided in that location i.e. gross motor vs sedentary activities.

Systems Change Recommendations

1. Establish Full-Time Afterschool Position

EEC should hire a full-time team dedicated to researching school age afterschool programs and building internal supports at the Department. A dedicated full-time professional(s) would allow EEC to more effectively gather feedback from school age providers and input that feedback into EEC's decision-making process.

2. Expand and Improve Professional Development Opportunities.

EEC must Ensure professional development opportunities for staff align with the development needs of youth including where applicable, school-age behavior management, mental health first aid, hands-on/project based learning, identity and belonging, connections to the school-day, healthy decision-making etc. EEC should ensure all trainings are appropriate to the school age field (for example: school-age only programs do not have to take safe sleep training etc.)

3. Strengthen Coordination with other Licensing Departments like DESE and DPH

A common pain point for afterschool providers is navigating requirements from other licensing agencies. EEC and other agencies that regulate school age after school programs should work in unison to achieve a shared vision and ensure youth have access to as many high quality learning opportunities as possible.