

Submitted Written Public Comment for January 11, 2022 Early Education and Care Board Meeting.

Name/Organization	Topic
Tracey Hanley / Four Season Pre School	Stresses Test and Stay for early childhood providers
Lisa Silvia	Adding on 2 more children for us to be licensed for 12 with an Assistant?
Nicole Preston/ For Kids Only	In favor of updating masking protocols
Maggie Hibbard Family Childcare Specialist Council of Social Concern	Emphasizes the field needs a new playbook with clear instructions. Everyone needs to be on the same page. Please address the following: <ol style="list-style-type: none"> <li>1. Provider tests positive</li> <li>2. A child in the program tests positive</li> <li>3. A parent of sibling of a child in our program tests positive</li> </ol>
Beth Sidel/The Love of Learning Preschool	Highlights the new CDC guidance should NOT include childcare.
Karina Marcotty, First Circle Learning Centers Maura Letourneau, Children's Express Child Care, Inc. Melissa Levin, The Children's Center at Groton Bobbi Rougeau, Alphabet Soup Childcare Center, Inc. Eileen Rakhunov, A to Z Childcare and Preschool Tina Cerulo, Kidde Academy of Burlington Sara Marino, Little Red Schoolhouse Kim Lannin, Inch by Inch Erica Kilcoyne, Cowlicks and Pigtails	Provides feedback from the field: Covid Reporting Changes: (If we are continuing to report covid cases on an incident report, to licenser, and to BOH/DPH) <ol style="list-style-type: none"> <li>1. Can we please have a covid specific incident report to fill out on the Lead portal ?</li> <li>2. Can this report also be a shared report with licensing so we don't have to double report it?</li> <li>3. Can this report be savable and shared with BOH/DPH?</li> <li>4. Can we please only report when there is an exposure to the center? Having us report on Covid cases for Educators and Children when they didn't expose the center to Covid is causing an unnecessary burden on the Administrators and Licensors who need to review all this information. We wouldn't fill out an incident report everytime an educator or child went to the emergency room or was injured in their own home. Can we please acknowledge that since the rapid/antigen tests have been for sale to the public that the Covid data regarding positivity rate is not accurate anymore. This overzealous reporting is not contributing to any substantive</li> </ol>

	<p>data at this time. We do believe that reporting exposures to the center is necessary and should continue but should be streamlined to make this process more efficient for all.</p> <ul style="list-style-type: none"> <li>• A Provider being part of the EEC board: <ol style="list-style-type: none"> <li>1. We propose adding an EEC board member who is a current Group Child Care, Family Child Care or Out of School Time Director or Administrator.</li> <li>2. This Board representative would meet with Regional representatives from each of the 5 regions monthly to hear and convey the needs of the regions to the rest of the EEC Board. The EEC Board could also use this team as a bouncing board for policies, changes or questions on current needs in the field. We all recognize that there are a variety of needs between the 5 different regions. Adding this tiered communication mode will help the EEC board and Commissioner collaborate in a bi-directional fashion which is what we strive to do with the families/guardians who put their child/ren in our care at our centers. This bi-directional communication method conveys respect, sharing and listening for all involved</li> </ol> </li> <li>• Host weekly Town Halls and Collaboration with epidemiologists <ol style="list-style-type: none"> <li>1. We need on-going information from the epidemiologists. We are many things, but we are not Public Health Professionals. Although we would like to think this pandemic is coming to a close, in reality, we know we are living with this for a long while. The ability to ask questions, reassure ourselves that we are adjusting our protocols safely and with the best interest of the educators, children and families that</li> </ol> </li> </ul>
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	<p>trust us to make these decisions on a daily basis with limited information. Directors have come together to support each other on a daily basis. It would be most appreciated if a Public Health Professional was available for an hour a week for our questions and concerns!</p> <p>We would also like to collaborate with the DPH epidemiologists to develop 3 tiers of center responses and actions to reflect: Low, Medium and High Risk protocols. Programs could adjust their protocols using this tiered approach depending on the Covid circumstances in their community and surrounding areas having examples of Early Childhood CDC protocols. Having this support would relieve a great deal of stress and uncertainty</p>
Jennifer Simpson/Brilliant Beginnings Daycare	<p>Emphasizes the need for more rapid testing as no cost to providers and the expansion of the state testing sites.</p> <p>Stresses the need to revisit the EEC guidelines – children should not return to FCC or childcare centers 5 days after testing positive if they wear a mask.</p>

## Kelly, Christian (EEC)

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**From:** Children's Express Child Care, Inc. <cechildcareinc@aol.com>  
**Sent:** Monday, January 10, 2022 5:59 PM  
**To:** Commissioner's, Office (EEC)  
**Subject:** Revised Feedback to the EEC Board for public comment letter

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Please accept this revised version of the previous note sent at 4:55pm tonight. The group participants have been updated. Thank you.

Dear Commissioner Sam and Board Members,

Please read the following feedback keeping in mind the dedication and passion to the Early Childhood field that we (Center Directors drafting this document) have been a part of for many, many years! Collectively, this core group of Directors drafting this letter have over 250 years of experience in Early Childhood as Educators or Administrators.

We are writing from the field to share with you our extreme disappointment and frustration with the on-going mode of EEC communications to the field.

As providers, we are dedicated to the health and safety of the children in our care. We rely on our licensing board to provide us with regulations and guidelines that we can implement in our programs. Unfortunately, throughout the pandemic, EEC has consistently demonstrated a pattern of being slow to support providers. In March of 2020, as we scrambled to respond to this new threat to the health and safety of our staff and children, EEC was silent until the Sunday before we were all shut down. In June of 2020, as we scrambled to open our programs safely for parents eager to return to work, EEC delayed giving us specific protocols until days before many of us opened. We relied on protocols adapted from colleagues in the field who had been operating in states that remained open throughout the pandemic or spent countless hours making CDC recommendations Early Childhood Friendly! When the Playbook was released, the information was excellent, but most of us had already developed our own materials because it was released so late.

In May of 2021, at 3pm on the holiday Friday and without any warning, EEC lifted all COVID protocols and left us to fend for ourselves. Many of us spent Memorial Day weekend answering parent emails and again scrambling to decide which COVID mitigation strategies we would lift and which we would keep. While we were told in September that there would be a new Playbook, this fall, none has appeared. Frustration again last week as we find out from a Boston Globe article that EEC is introducing a test and stay program soon. We don't feel included or represented in these decisions that affect our programs. We are constantly adjusting our programs and protocols causing a lot of confusion for Providers, educators and families.

When the CDC announced ten days ago the updated guidelines for isolation, parents besieged providers with questions, to which most of us replied that once we received updated information from our licensing board, we would let families know. Instead, we received an email from EEC that

informed us we are on our own to navigate yet another complication in this protracted battle. The message of the email was because this is a complicated and rapidly evolving situation, we are best equipped to handle it ourselves with support of local boards of health. Local Boards of Health are overwhelmed and most no longer respond to emails or phone calls. We recently realized that most EEC programs were left out of any local Covid initiatives to distribute rapid testing in the past few weeks. We are not looped in at the local level, yet are being directed there for support. We are not epidemiologists or public health experts and yet each provider has been put in the position to research the data, consult with our local Boards of Health (which often differ in their approach), consult with our Healthcare Consultants, and update our policies during a rapidly evolving and complicated public health crisis. Yes, our centers are privately owned. As such, we do not have HR departments, Health Services on-site to draft and revise protocols (for the past 22 months), Family Advocates to respond to the families needs, or Educator Advocates that respond to the educator's needs. Most of us are stand alone Administrators. We are the boots on the ground but without leadership to guide us during the most challenging crisis in our lifetimes. The new guidelines that were sent out on 1/6/22 ask for programs to have close contact children test on day 5, 6 & 7 in order to return to programs. Majority of the centers do not have access to rapid tests at this time and the centers who have acquired them have spent thousands of dollars to do so. PCR testing sites are not able to get test back in time for families to have their children participate in this. Your communication from 1/6 stated that you were working on getting these rapid tests to us, but we need them now not next month. More than a few directors have stated that without the monthly Grant funding and/or PPP relief that their doors would be closed.

For those of us in the field for many years, we've relied on EEC as our licensing authority and partner in keeping children healthy and safe. During the past two years, we've experienced a complete reversal of strategy and operations that took us from very specific guidelines and support to a lack of guidance. We are asking for responsiveness and support. We need guidelines, not autonomy. We are overwhelmed and feel alone. We are working more than full-time serving children and families while navigating the complexities of public health decisions we are not qualified to make, trying to meet our own family's needs during a pandemic, remaining consistent with our Covid protocols at all cost to keep our doors open, all while being challenged and questioned continuously by parents who understandably need to work. We are constantly defending our protocols when parents question and/or challenge our decisions everyday. This is not just one or two of us...this is the majority of us...We are exhausted....We are burning out!

We providers have done what we were asked to do. We were told to open our doors at the end of June and we did, while public school didn't resume in person until April of 2021 with children who can social distance, get vaccinated and wear masks properly. We have adhered to the regulations and guidelines every day. We opened bravely 22 months ago and our staff have been on the front lines every single day. We deserve leadership, support and communication from our licensing authority, and we need clear regulations to keep our staff and the children in our care healthy and safe. And please, please, please..stop sending us important changes and announcements on Friday afternoons or over the weekend. We deserve weekends too.

As a group we have brainstormed some ideas that can help us at this time. We are open to discussing what we envision these looking like in more detail.

- Covid Reporting Changes: (If we are continuing to report covid cases on an incident report, to licensor, and to BOH/DPH)

1. Can we please have a covid specific incident report to fill out on the Lead portal ?

2. Can this report also be a shared report with licensing so we don't have to double report it?
3. Can this report be savable and shared with BOH/DPH?
4. Can we please only report when there is an exposure to the center? Having us report on Covid cases for Educators and Children when they didn't expose the center to Covid is causing an unnecessary burden on the Administrators and Licensors who need to review all this information. We wouldn't fill out an incident report everytime an educator or child went to the emergency room or was injured in their own home. Can we please acknowledge that since the rapid/antigen tests have been for sale to the public that the Covid data regarding positivity rate is not accurate anymore. This overzealous reporting is not contributing to any substantive data at this time. We do believe that reporting exposures to the center is necessary and should continue but should be streamlined to make this process more efficient for all.

- A Provider being part of the EEC board:

1. We propose adding an EEC board member who is a current Group Child Care, Family Child Care or Out of School Time Director or Administrator.
2. This Board representative would meet with Regional representatives from each of the 5 regions monthly to hear and convey the needs of the regions to the rest of the EEC Board. The EEC Board could also use this team as a bouncing board for policies, changes or questions on current needs in the field. We all recognize that there are a variety of needs between the 5 different regions. Adding this tiered communication mode will help the EEC board and Commissioner collaborate in a bi-directional fashion which is what we strive to do with the families/guardians who put their child/ren in our care at our centers. This bi-directional communication method conveys respect, sharing and listening for all involved

- Host weekly Town Halls and Collaboration with epidemiologists

1. We need on-going information from the epidemiologists. We are many things, but we are not Public Health Professionals. Although we would like to think this pandemic is coming to a close, in reality, we know we are living with this for a long while. The ability to ask questions, reassure ourselves that we are adjusting our protocols safely and with the best interest of the educators, children and families that trust us to make these decisions on a daily basis with limited information. Directors have come together to support each other on a daily basis. It would be most appreciated if a Public Health Professional was available for an hour a week for our questions and concerns!
2. We would also like to collaborate with the DPH epidemiologists to develop 3 tiers of center responses and actions to reflect: Low, Medium and High Risk protocols. Programs could adjust their protocols using this tiered approach depending on the Covid circumstances in their community and surrounding areas having examples of Early Childhood CDC protocols. Having this support would relieve a great deal of stress and uncertainty.

Many Directors have stated that without the PPP relief last year, and the monthly grant funding, their doors would be closed already. The field is at risk of crumbling. Many dedicated professionals who have worked hard alongside of you all to build this field, are considering leaving the field, closing or selling their programs. ECE cannot thrive and grow in the ways that we know it can without these

smart, creative and persistent individuals to mentor and support the next generation of Educator professionals coming up. In closing, we ask that the EEC board and the Commissioner recognize that the EEC field can not continue to function in a "Business as usual" mode when we are in a state of crisis. Something has to change...

Respectfully,

Karina Marcotty, First Circle Learning Centers  
Maura Letourneau, Children's Express Child Care, Inc.  
Melissa Levin, The Children's Center at Groton  
Bobbi Rougeau, Alphabet Soup Childcare Center, Inc.  
Eileen Rakhunov, A to Z Childcare and Preschool  
Tina Cerulo, Kidde Academy of Burlington  
Sara Marino, Little Red Schoolhouse  
Kim Lannin, Inch by Inch

## Kelly, Christian (EEC)

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**From:** Nicole Preston <npreston@fkoafterschool.org>  
**Sent:** Monday, January 10, 2022 10:47 AM  
**To:** Commissioner's, Office (EEC)  
**Subject:** Public Comment - Mask Wearing

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello,

Are there any conversations ongoing about eliminating the mandated mask wearing in childcare programs now that there has been a sufficient amount of time for kids 5+ to get vaccinated? At which point are we going to reassess the pro's/con's of children masking? As communities measure their vaccination rates, we are starting to see more affluent communities eliminating the mask mandate as a large percentage of children are vaccinated. I worry that we are creating yet another gap in children, as we all know mask wearing is not in the best interest of a child's overall health and well-being.

Thanks for your consideration.  
Nicole

**Nicole Preston**  
*Director of Development*

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194 Essex Street, Salem, MA 01970  
[www.fkoafterschool.org](http://www.fkoafterschool.org) | [@fkoafterschool](https://twitter.com/fkoafterschool)  
[#whatsyourheartprint](https://www.instagram.com/whatsyourheartprint)





## Kelly, Christian (EEC)

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**From:** Beth Pumpkin <pumpkin\_01373@yahoo.com>  
**Sent:** Monday, January 10, 2022 4:52 PM  
**To:** Commissioner's, Office (EEC)  
**Subject:** Public Comment for 1/11/22 Meeting RE: Covid Response

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.


Dear Commissioner Aigner-Treworgy and All members of the EEC Board,

We are about to enter our 3rd year in a pandemic. Providers are tired, parents are tired, staff is tired, and I am sure all of you are tired. But, we are the ones on the ground. The ones putting our lives and the lives of our community including children and families at risk. You are still holding remote meetings which I am glad you are able to do, but we are open, working with children and families directly. Children who need us to comfort them, hold them, change them, help them, and be near them whether they are able to wear a mask or not. The new CDC guidance should NOT include childcare. Even in my program, where all children are masked, the 2 year olds are not able to put masks on their faces by themselves, and the whole class is unmasked approximately 50% of our day between nap and meals, which are all inside. It says right in the information you provided to us that the incubation is 2-14 days, but we are being told we should shorten the time children are out of care. We asked for guidance, begged for it and you told us that we are the experts and can make the best decisions for our programs. So, many of us banded together, talked about what we should do after the CDC released the decrease in quarantine during the time when the numbers were at the highest they have ever been. Some of our experts were even gracious enough to share the letters they wrote to parents for everyone to use. Then 2 days later, you ripped that away from us. I understand that what was put forth was done to try to help us, but it does not. Instead, the language used is "EEC strongly discourages programs from adopting more stringent exclusionary policies than those provided by DPH/CDC. " For the PAST 2 YEARS you said the guidance from the office was MINIMUM and that because each and every program in this state is unique, it is up to us to set policy that makes sense for our circumstances. I am truly disheartened by the newest language being used in the document that was released on Thursday January 6th, 2022. You have added to our stress, not supported us, not eased it. Parents are pushing back, they are tired too, they need to be at work too, but WE ARE TRULY JUST TRYING TO KEEP OUR COMMUNITIES SAFE. We are passionate, we care, we are doing the best we can, but we truly could use support instead of more stress. Thank you for taking the time to read my comments.

Sincerely,  
Beth Sidel M.Ed  
4 The Love of Learning Preschool  
43 Randall Wood Drive  
Montague, MA 01351  
[4theloveoflearning.com](http://4theloveoflearning.com)  
413-863-0267

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**From:** brilliantdaycare@yahoo.com  
**Sent:** Monday, January 10, 2022 5:05 PM  
**To:** Commissioner's, Office (EEC)  
**Cc:** Nonie Lesaux  
**Subject:** Covid Concerns



Dear Commissioner and EEC Board Members,

I am writing you today with grave concerns regarding the current state of the childcare field. We are going on over 2 years of financial instability resulting from covid closures, lack of support from EEC administration, lack of guidance when needed, lack of proper PPE and testing availability and the list goes on. One of the most frustrating parts of the whole thing is how EEC portrays everything to the media. The media is stating that tests are being delivered across the state to childcares. I received ONE. One test kit containing 2 rapid tests. I live in a home with 5 household members and have 8 childcare children that attend my program throughout the week. Again, I received ONE test. This does nothing to help me. Rapid tests cannot be found anywhere, and the cost is crazy. The financial burden of rapid tests should not be put on the providers that are barely able to keep their doors open. Then the state informs the public that the EEC testing sites have expanded. Again, false information. I sent a family to the testing site in Sturbridge this morning and they were turned away 45 MINUTES AFTER THE SITE OPENED! This is completely unacceptable. How are we supposed to keep children safe when our families cannot get tested? Also the parents take out their frustration on us. It has been an extremely long and tiresome 2 and a half years. We are exhausted, burned out, stressed out and literally cannot take much more. You have lost over half of the field in the last 2 years and with the lack of support and the severity of this pandemic you are in line to lose another 50% of the remaining providers over the next 6 months. We cannot keep this up.

This past week EEC released guidelines stating that we could have children return to our homes and childcare centers 5 days after testing positive if they wear a mask. When the commissioner was asked about how this could possibly be safe as the children are all unvaccinated and due to the amount of time they spend eating and sleeping are unmasked 50% of the day she said that it was fine. FINE for children to be around other children unmasked and positive. THIS IS NOT OK!! We need regulations that keep all of the children in our homes safe. Would you all allow an unmasked child to enter and stay in your home 5 days after they tested positive?? If you wouldn't then why should we?? I beg you to help the field in a way that should have been done 2 years ago. We are receiving \$1000 a month in ARPA funding. I have children out of care for 8 days at a time EVERY single time there is an exposure. I am currently losing \$1650 a week when I have to shut down. Please help us!

Sincerely,

Jennifer Simpson  
Brilliant Beginnings Daycare  
Southbridge, MA