



April 3, 2017

The Honorable Anthony Portantino  
 Chair, Senate Budget Subcommittee #1  
 State Capitol, Room 5019  
 Sacramento, CA 95814

The Honorable Kevin McCarty  
 Chair, Assembly Budget Subcommittee #2  
 State Capitol, Room 6026  
 Sacramento, CA 95814

**2017-18 Governor's Budget:  
 Early Childhood Education Flexibilities  
 SUPPORT**

Dear Senator Portantino and Assembly Member McCarty:

The signatory organizations that represent school districts and county offices of education from across the state and *serve over 2 million of the State's preschool-grade 12 population*, write to express our strong support of Governor Brown's early childhood education (ECE) policy provisions as they address unnecessary administrative burdens and promote innovative local practices to braid and blend financial and programmatic resources to serve a greater share of our local communities. We believe his proposal is meritorious and valuable in helping us help our families by improving access to existing slots available under the California State Preschool Program (CSPP).

**Family Eligibility**

Our organizations believe that providing high quality early learning opportunities to our low-income families is a moral imperative, which cannot be achieved until the state addresses the foundational *access* issue of *family eligibility*. We request that the state immediately adopt the use of the most current state median income (SMI) data to determine family eligibility, with a provision that requires the state to annually update SMI for current data. Re-benching the SMI to the most

recent data will align California to the federal Child Care and Development Block Grant Act of 2014 and the corresponding regulations enacted in the summer of 2016. The 70<sup>th</sup> percentile of the SMI ceiling leaves too many of our neediest children unserved, so we urge the Legislature and the Administration to consider this issue this budget year.

### **Three-Year Investment Plan**

Additionally, while we strongly support the Administration's policy proposal, we are concerned about the proposed suspension of the three-year implementation to increase provider reimbursement rates in recognition of the impact of increases to the minimum wage, as well as the pause on additional state preschool slots. The Governor should honor the ECE budget commitment from last year.

Specifically, we offer our **SUPPORT** of the following provisions:

- **Title 22 Compliance (Section 38).** We support the determination that Title 22 standards and requirements are met when school districts, or their subcontracted providers, deliver CSPPs in Field Act-approved facilities. Since districts are subject to safety requirements that go beyond Title 22, including the strict health and safety requirements of the Field Act and other site and classroom requirements under Title 5 (covering CSPP and K-12 facilities), we believe that Title 22 requirements are redundant and unnecessary. Moreover, a major obstacle to our ability to serve more CSPP-eligible children when more preschool slots become available (as was the case when the state added a total of almost 10,000 full-day preschool slots over the last two years), is the length of time it takes to obtain a Title 22 facilities license. The Governor's alternative compliance to Title 22 provision removes barriers that have long stifled local innovation to serve our eligible families by eliminating redundancies between Title 22 and other LEA-specific requirements.
- **Adult-to-Child Ratios Flexibility (Section 9).** We support the ability to modify the adult-to-child ratio under the CSPP when other quality assurances are made, such as using a multiple subject credentialed teacher or maintaining a Tier 4 or 5 ranking in the Quality Rating and Improvement System. This provision is beneficial for districts in helping to serve a greater share of their four-year-old populations by enabling them to optimally blend and braid CSPP and transitional kindergarten resources while moving toward a more coherent program that serves all four-year-olds.
- **Serving Children Ages 3-4 with Special Needs (Section 6).** Because research consistently yields that early intervention for children with exceptional needs is most beneficial by addressing their needs in ways to promote effective learning and interaction, we appreciate the ability to serve three- and four-year-old children identified with exceptional needs in our Part-Day Preschool Program(s) even when their families' income exceeds the CSPP income ceiling. We understand that the Administration intends for the authority to serve these children after all income-eligible three- and four-year-old children are enrolled as currently required by law. We ask that budget language clarify that the children eligible to be served under this

provision are those children with exceptional needs, *as identified by individual education programs*.

- **Explicit Authority for TK/K Differential Instruction Minutes (Section 19).** We support the explicit authority to offer differential instructional minutes between our transitional kindergarten and kindergarten programs without the need to seek a State Board of Education waiver. This provision recognizes that the different developmental and academic needs between our four-year-old and five-year-old student populations and gives us the local flexibility to determine how best to serve their needs.
- **Alignment of Homeless Youth Definition (Section 3-4).** We support aligning the California’s definition of “homeless youth” to the McKinney-Vento Act not just for its policy soundness but to ensure that California providers continue to be eligible for federal funding tied to the definition.
- **Electronic Applications (Section 7).** We support the authorization allowing use of electronic applications for subsidized child care; however, we ask that the Legislature and Administration seek equivalent efficiencies for our CSPP families who can benefit tremendously from leveraging technology.

We believe that the Governor’s proposal is a positive and significant first step towards creating a more coherent ECE system in California and look forward to working with the Legislature and the Administration to create solutions that will help us to better serve California’s children.

cc: Members, Senate Budget Subcommittee #1  
Members, Assembly Budget Subcommittee #2  
The Honorable Edmund G. Brown, Jr.  
Karen Stapf Walters, State Board of Education  
Jennifer Johnson, Deputy Legislative Secretary, Office of Governor Edmund G. Brown  
Jeff Bell, Department of Finance  
Kimberly Rodriguez, Office of Senate pro Tempore Kevin de León  
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