



EARLY CARE AND EDUCATION CONSORTIUM

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Nobel Learning Communities
Primrose Schools
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July 17, 2006

Jim Buckheit
Executive Director
State Board of Education
333 Market St.
Harrisburg, PA 17126-0333

Dear Mr. Buckheit:

Thank you for the opportunity to comment on the proposed early childhood regulations relating to Chapters 4, 11, and 12. As a national non-profit advocacy organization whose member companies represent more than 8,000 programs serving more than 500,000 children in nearly every state—including more than 200 centers in Pennsylvania—the Consortium supports the advance of quality early care and education that recognizes the interdependence of the ECE infrastructure, complements and sustains existing programs, and increases commitment to supporting early childhood professionals.

The Early Care and Education Consortium recognizes the considerable effort that has gone in to the development of these proposed regulations. We have an overarching concern they could more strongly encourage and support the inclusion of private child care programs—for-profit/not-for-profit, religious/secular, multi-site/single center—in the delivery of prekindergarten services.

Two sections with weak or missing language particularly merit further attention:

- Regarding §4.13, Strategic Plans, the language at (c)12 appears to leave to each school district the decision whether to encourage the participation of parents and community groups such as ECE providers, and at §4.13(c)16, language does not appear to require the school district to coordinate with community child care providers specifically, as well as with other entities.
- The requirement at §4.41 that prekindergarten programs provide at least 2½ hours of instruction, unless the Department of Education grants approval to deviate from this standard, begs the consideration of appropriate wrap-around care for the full-day needs of working parents. The proposed rules should also require school districts offering only 2½ hours of instruction to coordinate with community-based private early care and education programs to meet this need.

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Given the substantial investment in child care quality represented by the Keystone Stars program and other initiatives, it only makes sense that the Commonwealth take every step possible to encourage school districts to partner with the full range of high quality community based early care and education programs.

Sincerely,

Eric J. Karolak, Ph.D.
Executive Director