

**WEST VIRGINIA
SECRETARY OF STATE**

BETTY IRELAND

ADMINISTRATIVE LAW DIVISION

Form #5

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OFFICE WEST VIRGINIA
SECRETARY OF STATE

**NOTICE OF AGENCY ADOPTION OF A PROCEDURAL OR INTERPRETIVE RULE
OR A LEGISLATIVE RULE EXEMPT FROM LEGISLATIVE REVIEW**

AGENCY: West Virginia Board of Education TITLE NUMBER: 126

CITE AUTHORITY: W. Va. Constitution, Article XII, § 2, W. Va. Code §§16-3-4, 18-2-5, 18-2E-1
et seq., 18-5-17, 18-5-18c, and 18-5-44

RULE TYPE: PROCEDURAL _____ INTERPRETIVE _____

EXEMPT LEGISLATIVE RULE X

CITE STATUTE(S) GRANTING EXEMPTION FROM LEGISLATIVE REVIEW

W. Va. Code §§ 29A-3B-1, et seq.; W. Va. Board of Education
v. Hechler, 180 W. Va. 451; 376 S.E.2d 839 (1988).

AMENDMENT TO AN EXISTING RULE: YES X NO _____

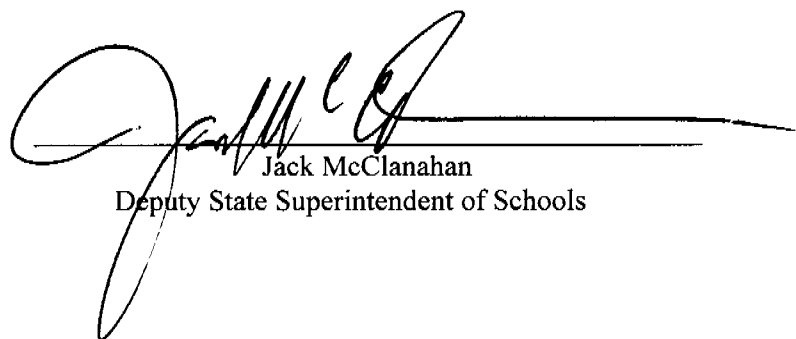
IF YES, SERIES NUMBER OF RULE BEING AMENDED: 28

TITLE OF RULE BEING AMENDED: West Virginia's Universal Access to a
Quality Early Education System (2525)

IF NO, SERIES NUMBER OF NEW RULE BEING PROPOSED: _____

TITLE OF RULE BEING PROPOSED: _____

THE ABOVE RULE IS HEREBY ADOPTED AND FILED WITH THE SECRETARY OF STATE. THE
EFFECTIVE DATE OF THIS RULE IS August 13, 2007.



Jack McClanahan
Deputy State Superintendent of Schools

EXECUTIVE SUMMARY

WEST VIRGINIA DEPARTMENT OF EDUCATION

Policy Number and Title: 2525 West Virginia's Universal Access to a Quality Early Education System

Background: In 2002, the Legislature passed W. Va. Code §18-5-44 which required the West Virginia Board of Education to fully implement a voluntary pre-k system by 2012-13 for all four year olds and to adopt a policy to govern the quality of classrooms included in the West Virginia Pre-k System. As the system moves toward full implementation, policy changes are needed to assure high quality programming for all WV Pre-k children.

Proposals: Changes to the policy are included as follows:

- In the definition section (126-28-3) the number of minimum/maximum hours of operation for a WV Pre-k classroom was delineated and there was a change in the language regarding the enrollment of five year olds into pre-k instead of kindergarten.
- In the collaboration section (126-28-6) new guidelines for the county team process, how to address necessary changes to the plan for approval, cross programmatic training, and the universal application and enrollment process were added.
- The former section seven was deleted since it is language directly quoted from the law and did not need to be repeated.
- The personnel standards section (126-28-7) removed the permit process description for community partners and added language for the newly developed West Virginia Community Program Permanent Authorization. Also, a requirement was included that beginning 2012-13, all new hires in community programs must have BA degrees.
- Section eight outlines the health and safety requirements (126-28-8) with new language regarding the HealthCheck protocol for standardization of screenings and physicals and more flexible guidelines for children's rest time.
- The standards for preparing students section (126-28-9) added language requiring classrooms to be adequately equipped to appropriately implement the chosen curricular framework.
- Section 12, Inclusive Environments (126-28-12) reflects the newly adopted language in WVBE Policy 2419.
- The staff development and training section (126-28-13) now includes language to support collaborative training based on the results of the ECERS-R continuous quality improvement plan.
- The financing section (126-28-15) clarifies processes for working with community partners to offer the WV Pre-k classroom at no cost to parents.
- Section 16 (126-28-16) on program evaluation has new language in regard to the how counties use the Early Childhood Environmental Rating Scale for program evaluation as required in the W.Va. Code §18-5-44.

Impact: The changes to the policy will increase the quality of the WV Pre-k classrooms through clarification and strengthening language regarding teacher qualifications, program evaluations, health screening protocols, financing, eligibility and programmatic hours.

Response to Comments:

Eighty two comments were received during the comment period. The majority of the comments revolved about four issues which were child eligibility, minimum program availability, use of the Healthcheck form and protocol, and requiring a bachelor's degree for all newly hiring teachers in community programs beginning in 2013-14. The original language for child eligibility was reinstated. The minimum program hours requirement was reinstated at 12 hours/week. Use of the HealthCheck form and protocol remained in the revised policy with local county school systems retaining the right to do screening for speech/hearing and development if they choose. The requirements for a bachelor's degree was eliminated after a meeting between the Chairman of the State Board of Education, State Superintendent of Schools, First Lady, Secretary of West Virginia Department of Health and Human Resources, and others. The issue will be addressed in the next revision of the policy.

FILED

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**TITLE 126
PROCEDURAL RULE
BOARD OF EDUCATION**

OFFICE WEST VIRGINIA
SECRETARY OF STATE

SERIES 28

West Virginia's Universal Access to a Quality Early Education System (2525)

§126-28-1. General.

1.1. Scope. - - This procedural rule establishes the criteria for approving and operating programs for four-year-old children and three-year-old children as mandated under federal law and herein after is referred to as WV Pre-k (hereinafter WV Pre-k).

1.2. Authority. - - W. Va. Constitution, Article XII, §2 and W. Va. Code §§16-3-4, 18-2-5, 18-2E-1 et seq., 18-5-17, 18-5-18c, and 18-5-44. All requirements of this policy are mandated components unless otherwise noted.

1.3. Filing Date. - - July 13, 2007

1.4. Effective Date. - - August 13, 2007

1.4.1. Unless specified otherwise within the policy.

1.5. Repeal of former rule. This rule amends W. Va. 126CSR28, West Virginia Board of Education (hereinafter WVBE) Policy 2525, West Virginia's Universal Access to Early Education System (hereinafter Policy 2525), filed July 14, 2005 and effective August 14, 2005.

§126-28-2. Guidelines.

2.1. WV Pre-k classrooms shall:

2.1.1. be voluntary

2.1.2. be readiness programs that are designed to meet the needs of all eligible children.

2.1.3. deliver content through the chosen approved curricular framework and the West Virginia Early Learning Standards Framework W. Va. 126CSR440, WVBE Policy 2520.15, Early Learning Standards Framework Content Standards and Learning Criteria for West Virginia Pre-kindergarten (hereinafter the WVLSF).

2.1.4. provide the building blocks for literacy

2.1.5. view children within the context of their family.

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2.1.6. utilize state approved curricular frameworks and assessments to inform and individualize instruction.

2.1.7. employ staff with strong professional education preparation in child development and early childhood education.

2.1.8. build on what children already know in order to consolidate their learning and foster acquisition of new concepts and skills through hands-on active exploration of their learning environment, problem solving, communication, creativity, and use of their imaginations.

2.1.9. incorporate meaningful ways of communicating with and involving parent/guardian/family.

2.1.10. evaluate program success for meeting the needs of the child through the use of the Early Childhood Environmental Rating Scale – Revised which will be administered by a trained, collaborative county team or outside experienced observer team.

2.1.11. establish teacher/child ratios and class size according to recommended guidelines.

2.1.12. maximize existing community, state and federal resources.

2.1.13. be an integral part of the West Virginia birth to kindergarten system of education and care.

2.1.14. take place in safe and healthy environments.

2.1.15. be inclusive of all children.

§126-28-3. Definitions.

3.1. *Active media* means materials that the child can control while participating in an activity such as taking pictures with cameras, making audio or video tapes, playing video games or working on a computer.

3.2. *Adequate supervision* means the observation, oversight, and guidance of the individual child or groups of children by the staff member taking responsibility for the ongoing activity of each child so that the staff member is close enough to intervene, if necessary, to protect the child from harm. Adequate supervision requires the staff member's physical presence, knowledge of the child's program of activities, individual needs, habits, interests and special problems, if any, and the acceptance of accountability for the child's or groups of children's care.

3.3. *Approved funding sources* means any funds used directly to support WV Pre-k classrooms for eligible children including West Virginia State Aid Funding Formula, Head Start

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funds, Even Start funds, Temporary Assistance to Needy Families, Child Care Development Funds, funds under the Elementary and Secondary Education Act (No Child Left Behind), funds provided by the School Building Authority of West Virginia, funds under the Public Law 108-446, Individuals with Disabilities Education Improvement Act of 2004, and any other private or public funds.

3.4. *Approved WV Pre-k participating programs* includes public school preschool, including preschool special education, and any community provider that contracts with the Local Education Agency (hereinafter LEA) including, but not limited to, childcare, private preschool, Head Start, and community-based programs that meet or exceed all of the requirements of this policy and are a part of a county's collaborative plan. Children participating in approved WV Pre-k participating programs can be counted in the school aid funding formula and the participating programs are eligible to receive funds through contractual agreements with or direct administration by the county school system.

3.5. *Collaborative setting* means a classroom of WV Pre-k children operated by a community program with resource support from the state through the Local Education Agency (LEA) or a classroom operated jointly by a community program and LEA.

3.6. *Continuous supervision* means the availability and responsibility of a staff member to assist with the children at all times.

3.7. *Contracted community program* shall mean any provider of early childhood services that meets all of the requirements of this policy and has a contractual agreement with the county school system to operate a WV Pre-k classroom.

3.8. *Core knowledge and core competencies for early care and education professionals* shall mean the sets of skills and knowledge that represent common standards of satisfactory practice in the early childhood field as defined in West Virginia State Training And Registry System (hereinafter WV S.T.A.R.S.) Core Knowledge and Core Competencies for Early Care and Education Professionals.

3.9. *County collaborative plan* means the plan each county school board, in cooperation with the county collaborative team, is required to submit. The plan shall include an analysis of facility and personnel needs, an analysis of demographics of the county related to the early childhood program implementation, financial requirements for implementation and potential sources of funding to assist implementation, details of how the county board will cooperate and collaborate with other early childhood programs, specific timelines for implementation, and any other requirements of this policy.

3.10. *Developmentally appropriate* means early childhood programming, curricula, and activities that address the stages of each child's cognitive, physical, social/emotional, and cultural development and utilizes a balanced approach of both child initiated and teacher directed

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instruction. Children should be actively engaged in hands-on, interactive activities for learning for a substantial portion of the day.

3.11. *Direct supervision* means that a qualified staff member is physically present in the same room, area, or vehicle with the child or group of children, visually monitoring the interactions of the children.

3.12. *Eligible child* shall mean any child, regardless of ability, who is four prior to September 1 of the year he/she is to enroll. Three year old children can be enrolled in the WV Pre-k System if they have an Individualized Education Program (hereinafter IEP.) Three year olds without IEPs may be present in the collaborative classroom if they qualify under the community program's enrollment guidelines. Children may not be excluded based on developmental delays. Children who are five prior to September 1 shall be enrolled in kindergarten, instead of WV Pre-k, unless the teacher, in cooperation with the parent, uses assessment data to determine that kindergarten placement for that child is not in the child's best interest. A five year old with special needs may be placed in a WV pre-k classroom if the IEP committee deems the setting as the best placement for the child. A child may remain in the WV Pre-k classroom for longer than one year if the decision is in the best interest of the child and based on curricular assessment data with mutual agreement between the teacher and parent/guardian.

3.13. *Experienced Early Childhood Environmental Rating Scale – Revised (hereinafter ECERS-R) Observer* is a person who has successfully completed modules I, II, and III of the West Virginia Experienced ECERS-R Observer Training .

3.14. *Local Education Agency (hereinafter LEA) Pre-k County Contact* is the person responsible for implementation of the West Virginia Pre-k System at the local education agency.

3.15. LEA means the county school system as the administrative entity for each county.

3.16. *HealthCheck* is the name of the screening tool and protocol recommended to be used for all children entering WV Pre-k. HealthCheck meets screening requirements including vision, hearing, speech, language, and dental health. HealthCheck forms are located at <http://www.wvdhhr.org/mcfh/ICAH/healthcheck/Default.htm>.

3.17. *Passive media* means materials the child cannot control while participating in an activity such as watching television, films and video tapes.

3.18. *Program availability* means offering each preschool class a minimum of 12 hours per week. Beginning July 1, 2008, classrooms cannot operate for more than 30 hours per week during the school year calendar and must be offered no less than 108 instructional days per school year. Up to six of those 108 days may be used for home visits/parent conferences.

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3.19. *Responsible adult* means a parent, staff member, or other adult whom the parent has designated.

3.20. *Staff: child ratio* means a relationship which describes the number of children one qualified staff member or substitute is permitted to supervise.

3.21. *Staff member* means any paid personnel, including substitutes, and student teachers.

3.22. *Teacher caseloads* means the total number of children a teacher in a WV Pre-k classroom is responsible for teaching and assessing each year.

3.23. *Trained collaborative ECERS-R team* means two or more persons with experience and knowledge of early childhood who have completed, at a minimum, the WV Experienced ECERS-R Observer Training, Module I.

3.24. *Universal access* shall mean that every eligible child in the county has access to a high quality WV Pre-k classroom that meets or exceeds all of the requirements of this policy.

3.25. *Universal application* means an enrollment form that may be used by all participating community partners at the county level to determine placement and enrollment of eligible children in the county's pre-k system.

3.26. *Universal precautions* means procedures to be followed for infection control in all situations to prevent the transmission of blood borne germs that may be spread through blood or body fluids that might contain blood.

3.27. *West Virginia Community Program Permanent Authorization* is a credential requiring teachers in early childhood community programs to have earned an Associate's degree in early childhood, child development, or occupational development with an emphasis in early childhood/child development and 21 hours of prescribed college coursework.

§126-28-4. Parent/Guardian Involvement and Family Support.

4.1. Parent/guardian involvement and family support must include:

4.1.1. a minimum of two documented face to face conferences annually with each child's parent/guardian/family. Home visits are recommended for these conferences.

4.1.2. documented methods of communicating with parents/guardians such as newsletters, child activity reports, phone calls, home visits, e-mail and conferences.

4.1.3. services to children and their families necessary to support the child in his/her transition into, participation in, and transition out of the program.

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4.1.4. for children who come from homes where languages other than English are spoken, support services including communication that is comprehensible and supportive of both the native language and English language development.

4.1.5. support services pursuant to WV 126CSR16, WVBE Policy 2419 - Regulations for the Education of Exceptional Students (hereinafter Policy 2419) provided in accordance with the needs specified in the child's Individualized Education Program for preschool children with disabilities who are integrated into the program.

4.1.6. opportunities for parents/guardians/family to participate in decision making about their child's education.

4.1.7. classrooms that are open to parents/guardians/families and where parents/guardians/families are encouraged to observe children in the classroom and to participate in classroom activities.

§126-28-5. Attendance.

5.1. Enrollment in an approved participating WV Pre-k program is voluntary; however, once the child is enrolled, attendance must follow W. Va. Code §18-8-1, et seq., which allows the program administrator (i.e. principal, director, executive director), teacher and parent/guardian to disenroll the child if they concur that requiring further attendance for that school year is not in the best interest of the child. Once a child is disenrolled, re-enrollment is not guaranteed.

5.2. Each county must establish and implement procedures to ensure that the parent/guardian and other family members, as appropriate, understand about the availability of services, the attendance policy and the benefits of childhood education.

5.3. Each county must include in its county collaborative plan a provision for working with families whose children are chronically absent and/or tardy that does not penalize the family for acting in the best interest of the child.

§126-28-6. Collaboration and the County Plan.

6.1. Through joint planning with community partners, each county board of education must submit a county plan (an original and three copies) to the Secretary of West Virginia Department of Health and Human Resources (hereinafter WVDHHR) and WVBE that reflects meaningful involvement of the county collaborative team.

6.2. The West Virginia Department of Education (hereinafter WVDE), in collaboration with the West Virginia Department of Human Resources has the responsibility of convening a committee to review the quality and content of the county plans by representatives from the WVDE, WVDHHR, and the Head Start Collaboration Office. The committee will make

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recommendations to the Secretary of WVDHHR and the WVBE regarding approval of the county collaborative plans. Participation on the committee by WVDHHR and Head Start State Collaboration Office will ensure the (1) maximization of federal and other available funds and (2) maximization of Head Start programs and other public and private programs approved by the State Superintendent of Schools.

6.3. Each county early childhood team shall meet regularly throughout the year to ensure that the following outcomes are met.

6.3.1. Joint decisions are made about the location of WV Pre-k classrooms including Preschool Special Education classes.

6.3.2. Decisions are made about responsibilities for sharing resources for each classroom including but not limited to staffing, facilities, food service and transportation.

6.3.3. A county wide joint universal application and enrollment process that includes a selection and placement criteria for children is utilized.

6.3.4. Services for children with identified special needs are provided in least restrictive environment according to the requirements of that child's IEP.

6.3.5. All approved participating programs are included or represented.

6.4. If a county plan is not recommended for approval, it will be returned to the county board of education with an explanation and instructions for re-submission. The County Superintendent and LEA county contact shall share this information with the county early childhood collaborative team upon receipt. The changes to the plan shall be signed by all required collaborative partners of the county collaborative team prior to resubmission. Once the county plans are reviewed by the collaborative review committee and recommended for approval or nonapproval, the signature of the Secretary of WVDHHR is secured. The Secretary of WVDHHR then forwards the list of approved and nonapproved plans to the WVBE for the July board meeting of the WVBE. At this meeting, the WVBE will vote to accept or reject the Secretary's list.

6.5. Changes, updates and amendments to the county plans are to be submitted to the WVDHHR and the WVDE in February each year until 2013 or until such time as the county offers universal access to a high quality program, as defined by this policy, for all eligible children in that county. Collaborative settings support the maximization of resources as required by W. Va. Code §18-5-44. Counties must maximize early childhood resources by collaborating with existing programs within the county before opening new classrooms operated solely by the LEA, unless those collaborative partners do not exist, or choose not to participate. A county's collaborative plan will reflect the documentation to support maximization of resources, as well as, reflect how this plan identifies both potential resources and the efficient use of currently existing resources.

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6.6. All changes of substance to the approved county collaborative plan must be submitted with signatures of all the required collaborative partners for approval to the Secretary of WVDHHR and the WVBE, or their respective designees, 30 days prior to the implementation of the changes. Failure to do so will negatively impact the approval status of the county collaborative plan. If the approved plan is not implemented and changes are not submitted and approved, a corrective action plan will be enforced.

6.7. In order to support counties in the effort to maximize existing resources by 2012-2013 or by full implementation, no less than 50% of the classrooms for eligible children must be provided through contractual agreements with community programs, including but not limited to Head Start and child care, unless the county collaborative team can document that those programs do not exist in that county, can never meet the mandates of this policy, or choose not to participate. Counties shall explore all feasible supports to enable community partners to meet the requirements of this policy, including providing certified teachers in community programs, before determining that programs cannot meet the mandates. This may not be construed to mean that counties will provide education services in public school settings only and contract out support services but rather that 50% of the classrooms for eligible children must be contracted with qualifying providers in collaborative settings. This ratio of community to public school providers can only be decreased with the written permission of both the WVBE and the Secretary of WVDHHR. When the county school system includes the eligible children attending in an approved, contracted community program in the count for the school aid funding formula, a portion of the money generated by the formula must be used through the contractual agreement to insure that the requirements of this policy are met and adhered to for the length of the contract. Counties shall phase in classrooms incrementally to meet the requirement for universality by 2012-13. In an instance when the LEA is the Head Start grantee, those settings are considered part of the mandate for collaboration; however, the collaboration does not fulfill these requirements for collaboration with community partners if those partners are available.

6.8. The county collaborative team must include, at a minimum, representation from the county school system preschool program, the county school system preschool special needs program, a licensed community child care program in that county not operated by the county school system, the Head Start program in that county, the local department of health and human resources, and a parent/guardian of a preschool child. Due to the nature of child care, every licensed child care program in that county must be extended an invitation to participate on the planning team. The county must submit a list of invitees with the county plan; however, all responses shall be kept on file at the LEA.

6.9. The county collaborative team shall annually assess the composition of the county collaborative team and should include a representative from the West Virginia Birth to Three System Regional Administrative Unit, the parent/guardian educator resource centers, child care resource and referral agencies, classroom teachers, Family Resource Networks, early parent/guardian education, local apprenticeship for child development specialist council, health, Starting Points, business, faith based early childhood program providers, Community Action, child abuse prevention agencies, higher education, and/or other community organizations and

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persons interested in, knowledgeable of, working with young children and their families providing support and education.

6.10. Any member of the county collaboration team that will provide services to eligible children in that county must follow all rules and regulations as outlined in this policy. The contract/agreement between the collaborating agencies must address how the collaborative will assure compliance with all applicable regulations and standards. It is the responsibility of the collaborative partners to ensure that the staff and administrators receive professional development related to the policies and regulations of all the collaborative partners.

6.10.1. In collaborative classrooms where community partners have regulations such as the Head Start Performance Standards or WVDHHR Child Care Licensing, these regulations shall apply in addition to WVBE Policy 2525.

6.10.2. Part-day community programs that are exempt from child care center licensing under WV Code 49-2B-3(e)(1) must be licensed in order to participate in WV Pre-k unless they are located in a LEA site.

6.11. The county collaborative plan must include documentation by each participating partner of his or her role in the development of the county collaborative plan.

6.12. The LEA must submit a request with the county collaborative plan to complete the determination process for universality for the following year.

6.13. Once a county collaborative plan is approved, in order to receive funding through the West Virginia State Aid Funding Formula, the LEA must submit the contract and budget for each collaborative classroom in that county to the WVDE Assistant Director of Early Learning and Literacy no later than August 1 of that year. Budgets will be submitted both in an EXCEL format and in paper form with the contractual partners' signatures.

6.14. Every county collaborative team must use a universal application and enrollment process that includes the necessary information to support enrollment in Head Start, child care and other community partner programs.

§126-28-7. Personnel Standards.

7.1. Teachers employed in a WV Pre-k classroom and hired by the LEA must hold the appropriate license issued by the WVDE.

7.2. To fully maximize resources, community partners may choose to hire their own personnel for the WV Pre-k collaborative classroom. Teachers employed in a WV Pre-k classroom operated by a community program may hold a Professional Teaching Certificate endorsed in Early Education, Preschool Education, or Preschool Special Needs; OR

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7.3. When no fully certified teacher is available within or for hire by the community program, the person employed by a community program should hold the minimum of a bachelor's degree and meet the requirements specified in W. Va. 126CSR136, WVBE Policy 5202, Minimum Qualifications for the Licensure of Professional/Paraprofessional Personnel and Advanced Salary Classifications (hereinafter Policy 5202), Section 11.1, for the First-Class/Full-Time Permit for Professional Teaching endorsed in Early Education, Preschool Education, or Preschool Special Needs; OR

7.4. When no fully certified teacher or an individual eligible for the First-Class/Full-Time Permit for Professional Teaching is available within or for hire by the community program, the person employed by the community program must be eligible for a Permanent Authorization for Community Programs.

7.4.1. General Criteria: The Permanent Authorization for Community Programs may be issued to an individual employed by a community program who has completed 1) the minimum of an associate's degree through an accredited institution of higher education as defined Policy 5202, §126-136-4.5; 2) the general requirements specified in Policy 5202, §126-136-9.1.1; 3) the minimum GPA specified in Policy 5202 §126-136-9.8; and the conditions for issuance specified in §126-28-7.2.2.

7.4.2. Conditions for issuance: The applicant for the Permanent Authorization for Community Programs must submit evidence of the following:

a. College/University Coursework: The minimum of an associate's degree in child development, early childhood, or occupational development with an emphasis in child development/early childhood; AND

b. Specialized Training. - Verification of coursework and/or professional development, approved by the WVDE, in the areas of preschool special education, child development, preschool curriculum, early language and literacy, assessment of young children, and family and community involvement; AND

c. Experience. - Verification of at least one year of early education teaching experience.

d. Verification of employment- Signature of contracted community program director.

7.4.3. Validity Period. - The Permanent Authorization for Community Programs shall continue to be valid unless surrendered, suspended, or revoked for just cause.

7.5. When no individual who is eligible for the Permanent Authorization for Community Programs is available within or for hire by the community program, the person employed by the community program must be eligible for a Temporary Authorization for Community Programs.

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7.5.1. General Criteria. - The Temporary Authorization for Community Programs may be issued to an individual employed by a community program who has completed 1) the minimum of an associate's degree through an accredited institution of higher education as defined Policy 5202, Section 5.4.2) the general requirements specified in Policy 5202, Section 9.1.1; 3) the minimum GPA specified in Policy 5202, Section 9.8; and the conditions for issuance specified in Section 7.3.2.

7.5.2. Conditions for Issuance. - The applicant for the Permanent Authorization for Community Programs must submit evidence of the following:

a. College/University Coursework. - The minimum of an associate's degree in child development, early childhood, or occupational development with an emphasis in child development/early childhood; AND

b. Experience. - Verification of at least one year of early education teaching experience.

c. Commitment. - Submission of Professional Commitment verifying the applicant's strategy for completing coursework and/or professional development, approved by the WVDE, in the areas of preschool special education, child development, preschool curriculum, early language and literacy, assessment of young children, and family and community involvement.

7.5.3. Validity Period. - The Temporary Authorization for Community Programs shall be valid for one school year and shall expire on June 30. An educator employed on or after January 1 may be issued a Temporary Authorization valid until June 30 of the following school year.

7.5.4. Three Year Limit. - All requirements for the Permanent Authorization for Community Programs must be completed within three years of the original issuance of the Temporary Authorization for Community Programs.

7.6. Renewal of the Temporary Authorization for Community Programs.

7.6.1. Conditions of Issuance. - The holder of the Temporary Authorization for Community Programs who continues to be employed by a community program must submit evidence of satisfying the following:

a. College/University Coursework. - Completion of credit approved by the WVDE through either six semester hours of coursework reflecting the minimum 3.0 GPA; AND

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b. Commitment. – Submission of Professional Commitment verifying the applicant's strategy for completing coursework and/or professional development, approved by the WVDE, in the areas of preschool special education, child development, preschool curriculum, early language and literacy, assessment of young children, and family and community involvement.

7.7. Persons who are employed to meet the staff/child ratios but are not certified teachers such as aides, assistants, or paraprofessionals must meet the criteria set forth in the WV S.T.A.R.S. career pathway level II. Level II is defined as persons who are at least 18 years old with a high school diploma or equivalent and one years of experience and possess the ability to understand and practice the core knowledge/core competencies with direction and instruction or through sponsorship of a professional organization or qualified mentor.

§126-28-8. Health and Safety Requirements.

8.1. Recognizing that all children within the WV Pre-k System shall be in safe and healthy environments, and that all of the collaborative partners within the WV Pre-k System have rules and regulations governing various aspects of their programming, this policy sets forth a core set of common health and safety standards that must followed in addition to any existing rules and regulations based on funding sources for individual programs. Classrooms in public schools will be monitored as a part of the Office of Education Performance Audit auditing process in addition to daily supervision by county and school level administrators to assure all health and safety requirements are met. Collaborative classrooms will also be monitored for compliance with the Head Start Performance Standards in partnership with local and federal Head Start personnel. Classrooms operated by or in collaboration with licensed child care be licensed under WVDHHR Child Care Licensing, W.Va. 78CSR1.

8.2. WV Pre-k classrooms shall limit class size to no more than twenty children per classroom. Ratios shall be two staff:20 children with one of the staff being a teacher. At naptime the allowable ratio is 1 staff member: 20 children. Caseloads for teachers of classrooms with children who have IEPs shall meet the requirements of WVBE Policy 2419. Teachers with no children who have IEPs shall not have more that 30 children for whom they are responsible.

8.3. Prior to or during the first week of employment in a WV Pre-k classroom, an orientation for new staff will be provided that includes a review of: WVBE Policies 2525 and 2520.15; classroom operational requirements; policies and procedures for confidentiality and information disclosure; behavior management; reporting child abuse and neglect and emergencies; policies and procedures for basic sanitation and infection control; policies and procedures for safety; including prevention of injury both indoors and outdoors; and fire safety; including the use of fire extinguishers; and training in abuse recognition and prevention. Existing staff members shall be knowledgeable of the above policies and procedures.

8.4. When children with IEPs are enrolled in the WV Pre-k classroom, ratios shall be met as set forth in WVBE Policy 2419.

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8.5. If WV Pre-k classrooms are operating for more than four hours, meals must be provided in accordance with the guidelines set forth under the WVDE Child and Adult Care Food Program or National School Lunch Program. Meals shall be served in a setting that encourages socialization and self-help skills, where the children and staff members are seated together when eating, and classroom staff members provide supervision and encourage positive eating habits and conversation. Programs not providing breakfast or lunch must provide a nutritious snack that meets the USDA meal pattern or nutrient standard menu planning requirements.

8.6. All children entering an approved participating WV Pre-k classroom must have age appropriate immunizations upon enrollment as defined by the American Academy of Pediatrics and recommended by WVDHHR, located at http://www.wvdhhr.org/immunizations/pdf/Pre-K_Vacc_Chart_final.pdf. A Superintendent's Interpretation related to immunizations can be reviewed at <http://wvde.state.wv.us/interpretations/view/8/227/interpretation.html>. Children that are not fully immunized, may be enrolled providing a plan has been developed to assure full immunization, but may not enter WV Pre-k classrooms until they have received the first series of required immunizations.

8.7. A WV Pre-k classroom shall have on file within 45 days of enrollment or prior to the first day of school attendance a record of a HealthCheck form, or other comprehensive health screening comparable to the HealthCheck protocol. All screening forms shall be signed by the child's licensed health care provider and completed within the past year (HealthCheck forms are located at <http://ww.wvdhhr.org/mcfh/ICAH/healthcheck/Default.htm>) that include any special required instructions for the WV Pre-k classroom. Counties can retain the right to conduct follow-up screenings.

8.8. Children in the WV Pre-k System classroom shall be observed by staff daily for changes that may indicate injury, infestation or illness, and record any observed changes in the child's file and notify the family.

8.9. Student information related to all health and medical conditions and documented on HealthCheck form or any other comparable information must be treated as confidential information and be maintained according to The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. §1232g; 34 CFR Part 99) and in such a manner that no one could view these records without proper authorization as specified in W. Va. 126CSR94, WVBE Policy 4350 – Procedures for the Collection, Maintenance and Disclosure of Student Data. Failure of school personnel to comply with the above rules shall result in personnel disciplinary actions based on W. Va. 126CSR142, WVBE Policy 5310 – Performance Evaluation of School Personnel W. Va. 126CSR, WVBE Policy 5902 – Employee Code of Conduct .

8.10. Staff members shall utilize universal precautions when exposed to blood and body fluids that might contain blood, as specified in WVBE Policy 2423 – Communicable Disease Control (126CSR51).

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8.11. The children shall have adequate supervision at all times. When children are on the premises, a WV Pre-k participating program shall ensure that staff: child ratios are met and at least two staff members are available at all times.

8.12. Staff shall ensure that the guidance, behavior management and discipline practices are constructive and educational in nature, appropriate to each child's age and circumstances, and in keeping with the WV Pre-k program's policies and procedures;

8.13. At all times, staff members are responsible for providing positive guidance that is appropriate to each child's age, understanding and circumstances. When a behavior problem arises, qualified staff members shall:

8.13.1. redirect the child to alternative behavior or other activities;

8.13.2. encourage the child to control his or her own behavior, cooperate with others and solve problems by talking through the issues;

8.13.3. speak so the child understands that feelings are acceptable, but inappropriate behaviors and actions are not; and/or

8.13.4. take action that relates to inappropriate behavior and ensure that any action that is taken is without bias and in proportion to the child's act.

8.14. Handling Behavior Problems. Staff members and other adults in a WV Pre-k classroom shall not handle behavior problems by:

8.14.1. subjecting a child to physical punishment of any kind.

8.14.2. putting anything in or on a child's mouth as punishment;

8.14.3. restraining a child by any means other than a firm grasp around a child's arms or legs and then for only as long as is necessary for the child to regain control;

8.14.4. subjecting a child to psychological punishment of any kind, including but not limited to, ridicule, humiliation, or negative remarks about the child or the child's family, including remarks about race, gender, religion or cultural background;

8.14.5. using harsh or profane language, yelling, screaming, or actual or implied threats of physical punishment;

8.14.6. punishing or threatening a child in association with food, rest or toilet training;

8.14.7. isolating a child without supervision or placing the child in a dark area;

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8.14.8. permitting a child to discipline other children;

8.14.9. punishing an entire group for the actions of one child or a few children; or

8.14.10. seeking or accepting parental permission to use physical punishment or other actions prohibited by this rule.

8.15. A WV Pre-k program shall develop, implement and maintain policies and procedures for the reporting of child abuse and neglect that include:

8.15.1. the definition of child abuse and neglect, and

8.15.2. the requirement to report immediately, in accordance with W. Va. Code § 49-6A-1 et seq., any suspected incident of child abuse and neglect to Child Protective Services, or when the staff member believes that the designated person-in-charge would not or has failed to report the suspected incident, to the Child Abuse Hotline, 1-800-352-6513.

8.16. Each WV Pre-k classroom shall provide a minimum of 35 square feet per child of usable classroom space. A WV Pre-k program shall not provide activity space in a basement area unless the basement area is approved by the State Fire Marshal.

8.17. A WV Pre-k program shall provide an outdoor play area that includes a minimum 75 square feet of space per child, or if the outdoor play area has less than that a WV Pre-k program shall establish an outdoor play schedule for rotating groups of children to meet the minimum space requirement and to ensure that each child has an opportunity to play outdoors each day, weather permitting.

8.18. The WV Pre-k program shall provide one flush toilet and one lavatory per 15 children, excluding children in diapers who are not receiving toilet training. Toilets will be easily accessible to the children and provisions must be made so that pre-k children have adequate supervision during toileting. At no time should pre-k children be without adult supervision in the bathroom.

8.19. A WV Pre-k classroom shall provide appropriate daily opportunity for the children in care to have supervised practice of brushing teeth;

8.20. A WV Pre-k classroom shall provide equipment and materials for indoor activities that are clearly organized within activity areas that support programming goals and allow for adequate supervision.

8.21. Pre-K classroom shall provide an opportunity for a child to nap or rest. If the program operates for more than four hours per day a regular rest period shall be scheduled and utilized when the child desires or exhibits the need to rest. Programs operating for less than four hours daily shall assure that children have access to rest areas as necessary. These rest or nap

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areas shall be set up to reduce distraction or disturbance from other activities. Appropriate sleeping equipment shall be provided by the program. Children are not allowed to sleep on the floor or in a sleeping bag or on linens without mats or cots.

8.22. Outdoor activity shall be considered an extension of the classroom. When children participate in WV Pre-k programming for more than four daytime hours, weather permitting, a WV Pre-k classroom shall provide a minimum of one hour of outdoor activity daily as a part of the curriculum, on days when the temperature is 40 degrees Fahrenheit or more, and may provide outdoor activity on other days, as appropriate. Daily outdoor activity shall support the implementation of the approved WV Pre-k curriculum and the WVELSF. Programs operating less than four hours per day must have 30 minutes of daily outdoor activity, weather permitting

8.23. Staff members shall wash their hands before starting work; and staff members and children shall wash their hands with soap and warm, running water for at least 20 seconds:

- 8.23.1. when hands are contaminated with body fluids;
- 8.23.2. before preparing, handling or serving food, or setting the table;
- 8.23.3. after toileting, handling diapers or assisting a child with toilet use;
- 8.23.4. before and after eating meals or snacks;
- 8.23.5. after handling pets or other animals;
- 8.23.6. before giving medication;
- 8.23.7. after playing outdoors;
- 8.23.8. after handling garbage; and
- 8.23.9. after removing protective gloves used for any purpose.

8.24. Because of allergies and the potential dangers associated with having animals in the classroom, animals can only be in the pre-k classroom with prior parent awareness and approval.

8.24.1. A WV Pre-k classroom shall not have on the premises ferrets, birds, reptiles, including snakes, lizards and turtles, or any wild or dangerous animals.

8.25. A WV Pre-k classroom shall ensure that the outdoor play area for a child under school age:

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8.25.1. is enclosed on all sides by a natural barrier or secure fence that is at least four feet high with a bottom edge that is less than three and one-half inches from the ground;

8.25.2. if it has a fence, the fence has no openings greater than three and one-half inches;

8.25.3. if it has a natural barrier, the barrier has the strength and density to prevent humans and animals from entering or exiting the playground;

8.25.4. if it is attached to a building, that the barrier or fence provides at least two exits from the play area, including one exit that is at a distance from the building;

8.25.5. when it has an exit that does not lead directly indoors, that it is protected by a gate equipped with a closure mechanism that is out of the reach of a small child and prevents the child from leaving the play area, but can be easily opened by an adult, and

8.25.6. has age appropriate equipment to support the curriculum and the children's development.

8.26. For programs participating in the county collaborative plan, transportation is considered a support, not a mandated service, unless it is a related service for children with disabilities in accordance with state and federal requirements.

8.26.1. Bus drivers are trained in the supervision of young children (in addition to any other staff development received).

8.26.2. Children transported by a school bus who attend a pre-k classroom and are not yet enrolled in kindergarten will sit in a segregated area of the vehicle with other pre-k children.

8.26.3. Staff shall be available to assist children on and off buses at the WV Pre-k site. If a parent/guardian is unable to meet the bus, there shall be a person designated by the parent/guardian to assist the child. Bus drivers must inspect the bus at all final drop off points to assure that no children are left on the bus and these inspections must be charted. A log of daily inspections shall be maintained on file with the principal/supervisor. At each pre-k site where bus transportation is provided, a designated person must follow-up with the family of any child who is not present or accounted for each day.

8.27. When a WV Pre-k classroom plans an activity that involves active media, the center shall ensure that:

8.27.1. the active media supplements but does not replace traditional early childhood materials;

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8.27.2. a child has a choice of other activities and materials;

8.27.3. staff members are available to support the activity by discussing the use of the active media with the child;

8.27.4. the computer software chosen is developmentally appropriate and supports creative play and learning; and

8.27.5. no video games or computer software with sexual or violent content, profanity or aggressive behavior are used.

8.28. If passive media is used, a WV Pre-k classroom shall ensure that:

8.28.1. passive media is not routinely part of the daily schedule;

8.28.2. that staff members are available to support the use of it by discussing what is viewed with the child;

8.28.3. the contents of television and movies are designed to benefit the child, with limited viewing time and the child who does not wish to watch has a choice of other activities; and

8.28.4. no television programs, cartoons or movies with sexual or violent content, profanity or aggressive behavior are viewed.

8.29. A WV Pre-k classroom shall ensure that products containing potentially hazardous chemicals, such as identified poisons, medications, certain cleaning supplies, and non toxic art supplies. These items should be stored in a locked cabinet away from food and in their original containers. These chemicals shall be used according to manufacturers' instructions, and in a manner that will not contaminate play surfaces or articles.

8.30. Plastic bags and Styrofoam objects shall not be accessible to the child less than four years of age.

8.31. Handling of balloons by pre-k children is prohibited.

§126-28-9. Standards for Preparing Students.

9.1. The WV Pre-k classroom must implement the WV ELSF, which is aligned with Head Start Outcomes Framework and the kindergarten content standards and objectives. The content standards and objectives for programs serving eligible children are written to reflect a developmental continuum that enhances successful transition into kindergarten. Children shall be assessed on their individual developmental progress along the developmental continuum.

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9.2. When a WV Pre-k System classroom opens, it shall be equipped as required by the chosen curricular framework.

§126-28-10. Curriculum and Assessment.

10.1. Only comprehensive curricula systems and comprehensive assessment systems that are included on the approved list shall be used by WV Pre-k classrooms including classrooms that serve children with identified special needs.

10.2. Selection and use of supplemental materials/curricula enhancement, that address core content areas such as language and literacy acquisition or numeracy, must be based on scientifically based research and support the philosophy and techniques of the comprehensive curriculum and the requirements of this section. Teaching strategies such as worksheets, extended periods of sitting, seat work at desks or tables, flashcards, prescribed sequence of content, content areas taught in isolation, requiring all children to be working on the same skill, lack of individualization, or a high level of teacher directed instruction are not allowed as a part of the supplemental curricula.

10.3. Comprehensive curricula systems, curriculum enhancements and comprehensive assessment systems will be approved following a process similar to the process established by the WVDE, including, preschool special education, for adoption of instructional materials using the Partners Implementing an Early Care Education System (hereinafter PIECES) Advisory Council and appropriate subcommittees.

10.4. A comprehensive curricula system must meet the following standards:

10.4.1. include a philosophy, goals and objectives based on current knowledge of child development and learning styles and reflect an understanding of how children learn and develop; by:

a. addressing the developmental needs of eligible children through practices that are consistent with current, nationally recognized, most effective practice;

b. valuing exploration, creativity and construction as the child's primary learning approaches;

c. engaging children actively in the learning process and providing them with opportunities to make meaningful choices;

d. responding to individual children's interest, strengths and needs based on ongoing observation and assessment; and

e. supporting children so they view themselves as part of a larger community.

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10.4.2. be balanced and designed to achieve the long-range goals for social, emotional, physical, cognitive and academic (early literacy, early numeracy, and language) achievement; by:

a. incorporating a wide variety of learning experiences, materials and equipment, and instructional strategies that are responsive to the differences in prior learning experiences, maturation rates, and learning styles young children bring to the classroom.

b. supporting a balance of large and fine motor activities, quiet and active times, individual and small and large group activities, child initiated and adult initiated activities, planned and spontaneous activities, and indoor and outdoor opportunities.

c. addressing the development of knowledge and understanding, processes and skills, dispositions and attitudes.

10.4.3. integrate development of all domains, abilities, and content that is relevant, engaging, and meaningful to young children; by:

a. meeting the developmental continuum contained in the content standards and objectives for eligible children as prescribed by the WVBE .

b. building on what children already know in order to consolidate their learning and foster the acquisition of new concepts and skills.

c. reflecting the needs and interest of individual children in the group by including the immediate environment and world with which the children are acquainted.

d. supporting integration of curriculum content through use of a planning organizer (such as themes, projects, key experiences, or webs).

e. including materials and activities that reflect a variety of cultures, languages, ages, abilities, and beliefs.

10.4.4. emphasize the development of thinking, reasoning and problem-solving skills through strategies such as open-ended questions, investigation, imaginative and dramatic play, and peer interactions;

10.4.5. promote flexibility and adaptation to unique needs of children and families where ongoing observation and assessment are used to determine appropriate planning and adaptations for varied learning styles, temperaments, abilities, and languages or modes of communication; by:

a. integrating curriculum and assessment that benefits the child.

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b. making opportunities for all children, regardless of ability, to participate in all activities through appropriate adaptations or modifications of activities, assistive technology, materials and/or learning environments.

10.4.6. design a learning environment that supports the curriculum and allows children of all abilities to make choices, to discover, to explore, and to solve problems; by:

- a. assuring children's health and safety.
- b. clearly defining learning centers and incorporating them into the classroom.
- c. organizing and labeling materials and equipment and making them accessible to all children.
- d. incorporating non-stereotypical images in all elements of the environment.
- e. supplying a sufficient quantity and variety of appropriate materials.
- f. rotating the availability of materials.
- g. supporting a child's needs for privacy and a safe place to be alone.
- h. introducing children to the unfamiliar.

10.4.7. support the importance of learning during routine times of the day and meeting the physiological needs of children; by:

- a. promoting consistency in schedules and routines and facilitating smooth transitions.
- b. supporting continuity between home and school.
- c. encouraging children's participation in routines to develop responsibility and independence.
- d. recognizing the integral role of adults during routine times.
- e. allowing for flexibility and adaptations for individual children.
- f. supporting positive health and nutrition practices.

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g. providing daily rest times for children in programs operating more than four hours/day and allowing non-nappers to engage in quiet activities.

10.4.8. promote, through a variety of strategies, the essential role of families as partners in planning and implementing their child's care and education;

10.4.9. emphasize the value of social interaction to learning in all domains and promote frequent, responsive, respectful interactions between children, staff and children, and staff and families;

10.4.10. recognize the role of children's psychological safety in learning and include guidance techniques that support children;

10.4.11. promote the use of developmentally appropriate curriculum and assessment principles to determine how technology is incorporated into the classroom environment as a complement to, not substitute for, effective teaching or good curriculum; and

10.4.12. include a comprehensive assessment system that evaluates the program's success in meeting the needs of young children, for helping them be ready to succeed in school, and documents the child's individual progress on the continuum of development ~~by:~~

a. supporting the child's development and learning without threatening their psychological safety or feelings of self-esteem.

b. supporting the parent/guardian relationships with their children.

c. demonstrating the child's overall strengths and progress.

d. encouraging self-evaluation by the child.

e. relying on demonstrated performance of real, not contrived, activities.

f. utilizing a variety of tools and processes.

g. allowing for differences in learning style and rate.

h. incorporating a mechanism for sharing with and feedback from the parents/guardians.

i. including the parent/guardian as collaborative partners.

10.5. The curriculum will be a part of the inter-related approach of using curriculum, assessment and content standards and objectives to facilitate the individualization and direction of classroom programming.

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10.5.1. Program components must include learning centers, incorporated within the classroom, designed to support literacy, early numeracy, and language, such as

- a. blocks and construction;
- b. books;
- c. manipulatives;
- d. science and nature;
- e. writing;
- f. role playing;
- g. physical activity;
- h. art; and/or
- i. music.

10.6. Classroom design and program implementation for eligible children must exclude the use of student desks, work sheets, long periods of sitting, use of shaming to discipline, withholding of food or bathroom privileges, or any other practice that is not appropriate for the ages/stages of the children or is harmful psychologically or physically.

§126-28-11. Transition and Continuity.

11.1. Each program participating in the county plan must have a written and implemented plan for transitioning children into WV Pre-k and out of WV Pre-k into kindergarten. At a minimum the plan will include:

11.1.1. an opportunity for the child and his/her family to visit the setting into which the child is transitioning.

11.1.2. written information to parent/guardian and/or other family members as appropriate about pre-k or kindergarten registration and what to expect in pre-k or kindergarten.

11.1.3. an opportunity for teachers/providers in the WV Pre-k and into kindergarten and eligible programs in that county to meet annually to discuss how to facilitate successful transition and support the reciprocity of readiness practices.

11.1.4. a county system for transferring assessment data, including but not limited to portfolios, for each child who has participated in a eligible program to the kindergarten

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teacher to assist the kindergarten teacher in identifying areas of development and areas for growth to meet the individual needs of each child.

11.1.5. policies and procedures for the transition of children with IEPs into and out of the WV Pre-k and will follow all state and federal requirements.

11.1.6. transition planning which follows the *West Virginia Childhood Transition Checklist* (www.wvearlychildhood.org.)

11.1.7. Programs will be designed to minimize the number of settings in which a child receives education and care services. Parent/guardian should be given options to enroll their child in a program that meets the needs of the family and supports consistency and continuity for the child. Placement shall not be limited to the local school district in which the child lives if openings are available in participating programs within that county that better meet the child and family's needs.

§126-28-12. Inclusive Environments.

12.1. County plans will outline the county's process for providing fully inclusive early childhood classrooms with appropriate supports for children with identified special education needs. Proximity does not guarantee inclusion.

12.2. Children with identified special needs must be served in the least restrictive environment which includes utilizing approved participating partners in WV Pre-k.

12.3. Socioeconomic level, ability, and/or funding streams should not be viewed as deterrents to providing fully inclusive programs.

12.4. The IEP placement determination identifies the setting where the IEP will be implemented. Placement decisions must be made consistent with 34 CFR §300.552 that requires:

12.4.1. the student's placement decision is made by the student's IEP Committee;

12.4.2. the placement be in the least restrictive environment based on and consistent with the IEP;

12.4.3. that unless the student's IEP requires some other setting, the child be educated in the early childhood setting where the child would have received services if he/she had not been disabled and as close as possible to his/her home school.

12.5. Placement in separate settings designed for students with disabilities should only be used when a child's IEP cannot be implemented in a less restrictive environment as

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determined by the IEP team and documented through multiple formal and informal assessment process.

§126-28-13. Staff Development and Training.

13.1. All county pre-k staff including teachers and teacher assistants/aides/paraprofessionals shall participate in 15 hours of staff development as described in the collaborative professional development plan that will be included in the county collaborative plan include a minimum of six hours of education on issues related to young children with special needs. The collaborative training plan will utilize the annual ECERS-R results, along with other professional development needs assessment data and be based on the Core Knowledge and Competencies for Early Care and Education Professionals (www.wvearlychildhood.org).

13.2. Professional development opportunities shall be registered with the West Virginia State Training and Registry System (WV S.T.A.R.S.) which can be accessed at www.wvearlychildhood.org.

13.3. Time shall be set aside for joint planning by the teacher, co-teachers and/or other professional personnel.

§126-28-14. Program Oversight.

14.1. LEAs have direct responsibility for the public school classrooms in their county. Local program oversight for contracted community programs must be defined in the contracts between the community program and the LEA including, but not limited to, staff evaluation and discipline, will be specified within the resulting collaborative agreements of each participating program in the county plan.

14.2. The WVBE or its designee and the Secretary of the WVDHHR or his/her designee will maintain state oversight.

§126-28-15. Financing.

15.1. Neither the WVBE nor WVDE may provide any funds to any county for the purpose of implementing this policy unless the county has an approved plan as outlined herein.

15.2. Commencing with the school year beginning on July 1, two thousand four, and thereafter, no county board may increase the total number of students enrolled in the county in early childhood programs until its county collaborative plan is approved by the Secretary of the WVDHHR and the WVBE.

15.3. Each LEA shall enroll Pre-k children in community classrooms and generate funding through the school aid funding formula according to the process and criteria established

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in the May 10, 2005 WV State Superintendent's Guidance document. Funding generated through community classrooms should be invested in providing quality early education services and local infrastructure to support WV Pre-k classrooms.

15.4. In addition to the resources brought to a pre-k collaboration, community programs participating as partners shall continue using federal and state funding available for these services such as Head Start and Child Care Development Fund monies supporting eligible children.

15.5. WV Pre-k classrooms that provide services to eligible children that can be counted in the county school aid funding formula, must provide those services at no cost to the parent/guardian of the children, including all instructional activities and field trips.

15.6. In child care, pre-k is an enhancement to the regular program during the designated pre-kindergarten hours. Since pre-k under this policy is part of a free public education, parents/guardians shall not be charged additional costs for the enhancement and beginning July 1, 2008 shall be offered a reduction in a child care tuition during the designated pre-kindergarten hours. Support for child care centers to offer reduced tuition shall be a part of the contract between the center and LEA.

15.7. The LEA shall provide sufficient assistance/funding to a collaborative community partner to enable the partner to offer services that meet this policy at no cost to parents and at no deficit to the program. In calculating costs and resources, the county collaborative team should consider a number of issues and cost, such as personnel, facility, materials and furniture, current budgets, needed improvements, and professional development.

§126-28-16. Program Evaluation for Quality Improvement.

16.1. The Early Childhood Environment Rating Scale-Revised (hereinafter ECERS-R, Harms, Clifford, and Cryer, 1998) will be utilized by each county collaborative team as a guidance tool to measure quality in each WV Pre-k classroom. The ECERS-R shall be administered by collaborative teams with representation from the LEA, contracted community partners, and at a minimum one program county administrator or outside observer. The ECERS-R is not intended to be administered by a single individual. By school year 2008-2009, at least one member of each team must be listed with the WVDE as an "Experienced ECERS-R Observer". The ECERS-R shall not be completed by individuals with direct supervision responsibilities for the classroom or by the teacher of that classroom for purposes of submitting the Annual Development Form (ADF) to the WVDE. The results of the evaluation will be submitted annually using the ECERS-R Annual Development Form (ADF) by July 15 to the WVDE, Coordinator of Early Childhood, Building 6, Room 722, 1900 Kanawha Boulevard, East, Charleston, WV 25305-0330. Failure to submit the ADF could negatively affect the approval of the county plan.

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16.2. The purpose of the program evaluation is to support continuous quality improvement by identifying strengths and areas for enhancement. Results of the program evaluation will be discussed with the teacher(s), providing them the opportunity to comment and provide input to the development of the ECERS-R ADF. The ECERS-R is not an evaluation of the teacher for performance purposes, or an assessment of the development of individual student, but rather an assessment of the program. Public school teachers shall continue to be evaluated according to W. Va. 120CSR142 WVBE Policy 5310, Performance Evaluation of School Personnel. The ADF will be developed jointly by teachers and administrators to ensure continuous quality improvement. Items scored at a level four or below must be identified for improvement and addressed on the ADF. Results and status of improvement must be reported in the subsequent year's county plan. WVDE will review and comment on each county ADF, with cooperation and support from PIECES Curriculum and Quality Initiatives Committee.

16.3. Programs will be assessed using the ECERS-R by qualified outside observers if concerns arise regarding the implementation of this policy. The ECERS-R ADF will guide statewide professional development planning and highlight areas for technical assistance and support.

16.4. When a county has fully implemented their county collaborative plan and all eligible children in that county have access to a WV Pre-k classroom that meets all of the quality requirements as outlined in this policy, the county board of education is required to annually submit a report that includes: a copy of the ECERS-R ADF, a summary of the WV Pre-k services provided in the county, the number of WV Pre-k children with identified special education needs, the staff development opportunities provided through the county collaborative plan and the number of staff who participated in those staff development opportunities, and number of children who transitioned into kindergarten and other information as required by the WVDE to the WVDE Assistant Director of Early Learning and Literacy by July 15.

16.5. The WVDE shall develop and institute a system of longitudinal, scientifically based research to track learner outcomes, family satisfaction, program continuity and related variables in order to evaluate program impact, as funds become available. The system shall be designed in such a way to be of benefit on both the county and state level and improve the quality of programming available for eligible children.

FISCAL NOTE WORKSHEET (Submit 4 Copies)

HD NO _____ DRAFT NO _____ BILL NO _____ RESOLUTION NO _____

SUBJECT Policy 2525 West Virginia's Universal Access to Early Education System FUND _____

SOURCE OF REVENUE: GENERAL FUND SPECIAL OTHER (SPECIFY) _____

COST OF ESTIMATE BASED ON: AN ORIGINAL ESTIMATE BUDGET BILL OTHER (SPECIFY) _____

INCOME ESTIMATE BASED ON: AN ORIGINAL ESTIMATE BUDGET BILL OTHER (SPECIFY) _____

SHOW OVER-ALL EFFECT IN ITEMS 1 AND 2 & GIVE EXPLANATION OF BREAKDOWN BY FISCAL YEAR INCLUDING LONG-RANGE EFFECT

EFFECT OF PROPOSAL	ANNUAL		FISCAL YEAR		
	INCREASE	DECREASE	CURRENT	NEXT	THEREAFTER
1. ESTIMATED TOTAL COST	see below		see below		
PERSONAL SERVICES CURRENT EXPENSES REPAIRS/ALTERATIONS EQUIPMENT OTHER					
2. ESTIMATED TOTAL REVENUES					

3. EXPLANATION OF ABOVE ESTIMATES (INCLUDING LONG-RANGE EFFECT):
 The cost of implementing universal access to early education programs in West Virginia is estimated to be \$85 million.

DATE
5/10/07

AGENCY
West Virginia Department of Education

AUTHORIZED REPRESENTATIVE
Thomas I. Paine

POLICY 2525: West Virginia's Universal Access to a Quality Early Education System

COMMENT LOG

DATE	INDIVIDUAL ORGANIZATION	COMMENTS	ACTION/TYPE	RATIONALE
05-16	Ashley Pearson Speech Assistant ashpearson@aol.com Berkeley county schools PO Box 146 Keedysville MD 21756	<p>§126-(#)-1 General</p> <p>My comment deals with section 3.18 that changes the hour requirement from a minimum of 12 to a minimum of 16. This change in hours will likely create a five day school week for Pre-K. This is a problem for special needs programs. There are so many referrals and children to be evaluated that a day with no children is essential to complete all the testing. It may be that to get in the hours needed, there would be only one class a day instead of two, reducing the number of children who are able to receive these services (it would be hard to solve this by creating more classes due to a lack in staffing). If this takes place, it will be completely contradictory to the spirit of this new policy. How can it be argued to increase hours for educational welfare when less students will be served?</p> <p>Lastly, There is no reason stated for this change and I find nothing in the legislature or code or framework mandating</p>	A +	One of many comments from the Eastern Panhandle. Half day programs plus a strong parent components support high quality and are acceptable

	these hours. Is there any evidence to support that more hours will be beneficial?		
05-16	<p>School systems with far higher qualified employees offer a far better educational model for Pre-K than does Head Start. It is a step backwards when the public school system's Pre-K program is brought down by policy to Head Start standards rather than bringing Head Start's programs up to our standards. Overall the changes are positive.</p>	<p>Jeff Hoover Superintendent jthoover@access.k12.wv.us Tyler Cty BOE</p>	NA-
05-22	None	<p>Katie Berry Program Coordinator kberry@access.k12.wv.us Monongalia County Starting Points 668 River Rd. Morgantown WV 26505</p>	No
05-24	Agree	<p>Marlene Midget Executive Director mmidget@npheadstart.org 51 16th Street Fourth Floor Wheeling WV 26003</p>	A+
05-29	<p>Head Start is often the child's first experience away from the family. For most, this is their first formal learning experience. Extending the time to require a sixteen hour week would be a disservice to the child. Flexibility is an absolute necessity in any early childhood program. The change will create a situation which will negatively impact the children we serve. Quality does not always depend on quantity. Our children are best served by staff who are well prepared and have had time to plan developmentally</p>	<p>Linda S. Johnson Teacer Assist. kidkare911@yahoo.com RESA V111 Head Start p.o. box 295 Inwood WV 25428</p>	<p>One of many comments from the Eastern Panhandle. Half day programs plus a strong parent components support high quality and are acceptable</p>

	<p>appropriate programs. It takes a great deal of time to meet with parents in the home in order to include the parents, the childrens first teacher, in the planning of the program. Staff will no longer be available to meet the many needs of the family if the school day is extended. Staff will no longer be available for vital trainings, which allow us to meet the needs of our families. I have been in the field of early childhood education for 27 years. Please allow those of us in the field to continue to nurture and guide these young children in a QUALITY program which takes time and effort to create and maintain.</p>	
<p>Diana Montgomery Speech Language Pathologist dlmslp@hotmail.com Berkeley County Schools 405 Galloway Road Martinsburg WV 25403</p> <p>05-29</p>	<p>I am a speech therapist for preschoolers with special needs. My Mondays are extremely busy with evaluations, writing assessment reports, drafting IEPs, initial and annual IEP/Eligibility meetings, and planning. When Mondays are not completely booked with evaluations and meetings, I need them as planning time to communicate with parents, plan for therapy, construct visual support strategies/augmentative communication systems, and to participate in staff developments/trainings. Therefore, to lose Mondays under the proposed policy plan would cause a problem for time needed to perform these duties. If students came full day for Tuesday-Friday, only half of the students would be served in this area. As this area continues to expand so does the need for more services. The growth in Berkeley County is ongoing and steady. Thank you for considering my comments on this matter. Sincerely, Diana Montgomery</p>	<p>One of many comments from the Eastern Panhandle. Half day programs plus a strong parent components support high quality and are acceptable</p>
<p>06-01</p>	<p>2.1.9 reads "evaluate program SUCCESS." ECERS-R is an environmental rating scale and should read "evaluate</p>	<p>NA- ECERS-R is nationally</p>

<p>06-01</p>	<p>David LeMaster dlemaster@bop.gov 411 Charles Street GLENVILLE WV 26351</p>	<p>program ENVIRONMENT." Program evaluation should involve child outcomes, surveys, interviews, etc.</p> <p>It has come to my attention effective for the 2007-2008 school year my child will be denied access to WV Pre-k. A change is being recommended to exclude children whom turn 5 years old before September 1 in Policy 2525 Section 3.12. My wife and I have been proactive in my child's education even before entering your school system. Until this recent proposal, enrollment into WV Pre-k was determined by mutual agreement between the teacher and parent/guardian. My son's date of birth is August 31, 2002. Prior to the 2006-2007 school year, my wife, whom is a teacher, had several discussions with other teachers currently in the school system. It was deemed through those conversations "not in the best interest of the child" to place him in WV Pre-k last year. It is well documented that the development of young boys is slower than their female counterparts. This information was even conveyed to me today, June 1, 2007, by members of the Gilmer County Board of Education. It disturbs me that the West Virginia Department of Education is no longer worried about the best interests of the child. This is supported by the removal of those words in your Policy 2525 Section 3.12.</p> <p>I urge you to reconsider the implementation of proposed changes for two main reasons: 1 - My child's development will be hindered due a change in policy. A policy we were in compliance with before and during the 2006-2007 school year. 2 - This is not in the best interest of child.</p>	<p>considered a program evaluation tool</p> <p>Reinstate former language</p>
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	David LeMaster		
06-03	<p>Brenda Riffe Pre-K teacher w/ special needs Briffe@kes.kana.k12.wv.us Kanawha County Schools Lakewood Elem. Penn. Ave. St. Albans WV 25177</p>	<p>My general concern is that as a WV Pre-k teacher with special needs, I can't begin to imagine having twenty children in my classroom with one assistant! I do not want to be liable or responsible for that number of children with the severity of special needs that I have had in the past. (Obviously, I need to read a copy of policy 2419.)</p> <p>I like that normal developing five year olds will be served in the already existing program of Kindergarten! I think we need to stick to this in order to serve all four year olds.</p>	<p>NA-</p> <p>This is an interpretation of policy at the local level</p>
06-07	<p>Andrea Campbell Assistant Professor acampbell@concord.edu Concord University Marsh Hall 104-A Concord University Athens WV 24712</p>	<p>In regards to ECERS-R, it maybe helpful if consistent language is used in terms of "evaluator or observer". On p.4 evaluator is used, p.6 observer is used, and on p.33 observer is used</p>	<p>A+</p> <p>Change in wording noted</p>
06-07	<p>Gayle Neldon Hearing Clinic Coordinator Gayle.Neldon@mail.wvu.edu WVU Dept. of Speech Pathology & Audiology 805 Allen Hall PO Box 6122 Morgantown WV 26506</p>	<p>Can this be correct? The hearing screening protocol is "seems to hear"? What a step into the dark ages of health care that is. Hearing loss is not an all-or-nothing disorder. Hearing loss exists in degrees ranging from normal through mild, moderate, moderately-severe, and severe to profound. At what point will the subjective screening protocol correctly identify children who need further evaluation? How will primary care physician's voices be standardized to make sure that all children with not normal hearing will be identified? Beyond degree of hearing loss, the configuration</p>	<p>NA-</p> <p>This change in policy is in accordance with standards set by the Department of Health and WVDE Office of Healthy Schools</p>

of hearing loss has to be considered. A flat configuration indicates that hearing loss is essentially the same across the frequency, or pitch, ranges. However a child with a low frequency hearing loss, or more commonly, a high frequency hearing loss could certainly "seem to hear" yet be at significant risk of poor academic success because although speech (the teacher's voice) may be perceived, it may not be understood. In the case of high frequency hearing loss, the presence of background noise further confounds the difficulty hearing instruction.

I am aware of a hearing screening tool in one pediatrician's office in past years. The screening consists of a closed set of pictures with a decreasing intensity of spoken words that the child must point to. It seems at first like a good tool, however the recorded word list is not randomized in the sense that words may be repeated. Therefore, as a child identifies a word at a louder intensity, that picture is eliminated from the pool of potential words from which to choose. At the softer intensities, where identification would be most important for screening, the child may have a 50% or 33% chance of passing purely by chance.

I can certainly understand a rationale for one healthcare provider to be responsible for several medical/health related screenings. And I understand that in counties where a speech-language pathologist or audiologist is not available to do hearing screenings, school nurses may have to do them. However, this is not a territorial issue. There are certified audiometric technicians across the country who do industrial and other hearing tests and screenings and I support their work. But to replace audiometric screening

			with a "seems to hear" protocol is a step in the wrong direction, regardless of who is doing the screening.	
06-08	Helen Post - Brown President SunbeamCCC@aol.com WVAYC 1654 Mary Lou Retton Drive Fairmont WV 26554		• We support 50% collaboration of community partners and appreciate the committee's role in continuing this rule.	A+
06-08	Helen Post-Brown Owner/Director HBrown1998@aol.com Sunbeam Child Care Center LLC 1654 Mary Lou Retton Drive Fairmont WV 26554		• I support 50% collaboration of community partners and appreciate the committee's role in continuing this rule.	A+
06-08	Susan Miller President millers@marshall.edu WVCCU 520 22 Street Huntington WV 25703		• We support 50% collaboration of community partners and appreciate the committee's role in continuing this rule.	A+
06-08	Sandra Panrell Director panrells@wvuh.com WVUH Child Development Center PO Box 8012 Morgantown WV 26506		I support all the West Virginia Child Care Centers United comments regarding the revisions of Policy 2525.	A+
06-08	Susan Miller		West Virginia Child Care Centers United would like to	This wording is

Director
millers@marshall.edu
Child Development Academy
@ Marshall University
520 22nd St
Huntington WV 25703

comment on the revisions of 2525.

We support 50% collaboration of community partners and appreciate the committee's role in continuing this rule. Many quality collaborations are taking place all over the state. But, there are many that are not getting adequate funding to support their program. All child care centers should receive adequate funding to support their centers. The term, "Collaborative classrooms" needs to be clarified. Presently we have different models all over the state. Suggestion: Collaborative classrooms shall be defined as classrooms operated by community programs with financial support from the state through LEA."

A-

The LEA shall provide funding for the community program to hire the pre-K teacher if the community programs prefer this model to the model of having a teacher placed by the LEA.

2525 states that by 2013 we will only be able to hire Pre-K teachers with certification. We do not support this change due to the fact that there is a predicted shortage of certified Pre-K teachers; therefore we need to continue hiring teachers who are approved to be on permit until there is no longer a shortage.

A o

2525 states Pre-K childcare programs cannot charge for Pre-K hours, therefore there needs to be a system in place that would reimburse for all Pr-K hours or allow childcare centers to charge for service.

ECERS is a great system for quality improvement.

Continued training of reliable assessors should take place. Curriculums and Assessments presently used increase

removed from the revision as per the decision of the State Superintendent of Schools.

	<p>quality in child care center programs and Board of Education programs. Playgrounds in many Board of Education sites are not safe for Pre-K children. They should follow the same safety regulations for playgrounds that child care centers do. ALL children should be safe in all settings!!</p>		
06-08	<p>Michele Forsythe Director hfccoffice@wirefire.com Holy Family Child Care & Dev. Ctr. 161 Edgington Lane Wheeling WV 26003</p>	<p>I am commenting on the revisions of 2525.</p>	<p>No</p>
06-08	<p>Irene Rhodes Owner/Director missirene@breezelink.net Miss Irene's PO Box 947 Martinsburg WV 25402</p>	<p>In Berkeley County, where childcare centers are used for the Pre-K program, there needs to be more consideration toward the cost of the program running inside said Center. For example: space given to local school boards to house the program @ 35 sq ft per child which then becomes 'dead space' for the Center. Use of elec., water, sewer, breakdown of mulch, playground equipment reimbursement. And the cost of providing an Aide for free. I did this for several years and have easily calculated a financial loss to my bottom line of about \$25,000 per school year. Center Director's can not afford this. There should be ample reimbursement for Centers, with the center actually making the same profit that they would if they had regular enrollment for the same 4 year olds. I find it disconcerting that so much money was allocated for this project, and yet I personally lost money. The School Board loses -0-, the parents lose -0-, yet the center owners take the entire financial hit. We all WANT to</p>	<p>These are issues not related to policy but to how the policy is implemented at the local level</p>

		<p>be supportive, but we operate on a shoestring budget as it is....we can NOT afford to simply give away our space and our Aides. I received about \$10,000.00 per school year from my local Board, and I received a "gift" of \$700. for outdoor equipment....but I paid \$15,000.00 for the Aide... so it doesn't take a rocket scientist to realize that my center lost a sizeable amount of money for trying to be the good buy and offer our support of the program. The bottom line is, Center directors can't take one more hit on their bottom line.</p>	
06-09	<p>Tamala LaBarge Child Development Center Dir tamiam_65@yahoo.com Scott's Run Settlement House PO Box 398 Osage WV 26543</p>	<p>2525 states Pre-K childcare programs cannot charge for Pre-K hours, therefore there needs to be a system in place that would reimburse for all Pr-K hours or allow childcare centers to charge for service.</p> <p style="text-align: center;">A o</p>	
06-10	<p>Larry g Vogler teacher lgvogler@access.k12.wv.us Burke St martinsburg WV 25401</p>	<p>I would comment in the section requiring five day attendance for preschoolers.</p> <p style="text-align: center;">N</p>	<p>Nothing in policy requires 5 day/week attendance</p>
06-11	<p>Melanie Ashworth Educational Audiologist mashwort@access.k12.wv.us Child Study Center 301 E Main St Romney WV 26757</p>	<p>I apologize for placing these comments in the incorrect section, but I could not find a comment area for 126CSR29. While I agree with the usefulness of having every preschool age child seen by a physical for health check, I have serious concerns about subjective hearing screenings being performed on this children during these checks. Hearing loss is an invisible "disability" and can go undetected for years by well-intentioned professionals who do not have the</p> <p style="text-align: center;">NA -</p>	<p>This change in policy is in accordance with standards set by the Department of Health and WVDE Office of Healthy Schools</p>

		training and experience in performing accurate hearing screenings. Newborn hearing screening will only detect those children born with hearing loss, not those who acquire hearing loss during childhood. It is my firm belief that audiologists and speech-language pathologists should be the professionals of choice to perform these screenings.		
§126-(28)-(10) Curriculum and Assessment				
05-22	Katie Berry Program Coordinator kberry@access.k12.wv.us Monongalia County Starting Points 668 River Rd. Morgantown WV 26505	None		
05-24	Marlene Midget Executive Director mmidget@npheadstart.org 51 16th Street Fourth Floor Wheeling WV 26003	Agree		
06-08	Helen Post - Brown President SunbeamCCC@aol.com WVAYC 1654 Mary Lou Retton Drive Fairmont WV 26554	• Curriculums and Assessments presently used increase quality in child care center programs and Board of Education programs.	A+	
06-08	Helen Post-Brown Owner/Director HBrown1998@aol.com Sunbeam Child Care Center	• Curriculums and Assessments presently used increase quality in child care center programs and Board of Education programs.	A+	

<p>LLC 1654 Mary Lou Retton Drive Fairmont WV 26554</p>	<p>Susan Miller President millers@marshall.edu WVCCU 520 22 Street Huntington WV 25703</p>	<p>• Curriculums and Assessments presently used increase quality in child care center programs and Board of Education programs.</p>	<p>A+</p>	
<p>06-08</p>	<p>Kay Tilton Director, Early Care and Education ktilton@wvdhhr.org WVDHHR/Early Care and Education 350 Capitol Street Room, B18 Charleston WV 25301</p>	<p>10.4.1. In tribute to our colleague, Ann Nutt, I would like to propose retaining all specific information related to curriculum. While it may be duplicative with other documents, it never hurts for us to review what is really important for the children in a pre-k program. And, it was really important to Ann.</p>	<p>NA+</p>	
<p>06-08</p>	<p>Irene Rhodes Owner/Director missirene@breezelink.net Miss Irene's PO Box 947 Martinsburg WV 25402</p>	<p>My personal insight is there is WAY too much standing in line, children putting their finger over their lips to be quiet, and heads on the desk. C'mon....these are 4 year olds for heavens sake. Thats too much to ask for 3rd graders day in and day out. I thought our program was way to strict and way to mature for the 4's. Alittle of that line standing goes along way with Directors of Centers. We are used to singing, having fun, playing games in line, and learning to simply be respectful of other's time and space....not preparing for the Military. I didn't like this aspect of "having control". Please don't lose sight of who we are teaching and</p>	<p>NA -</p>	<p>This is programmatic interpretation of pre-k programming and not reflective of WVBE Policy 2525 requirements</p>

		what we are teaching....the ABC's are vitally important, but so is swinging outside or learning how to whistle when you're 4. Do they ALWAYS have to be quiet and in a straight line to be doing "good"??? I think not.	
06-11	Christine Mayman Executive Director cheers@verizon.net CHEERS School Family, Inc. PO Box 344 KEarneysville WV 25430	Curriculums and Assessments presently used increase quality in child care center programs and Board of Education programs.	A+
§126-(28)-(11) Transition and Continuity			
05-22	Katie Berry Program Coordinator kberry@access.k12.wv.us Monongalia County Starting Points 668 River Rd. Morgantown WV 26505	None	
05-24	Marlene Midget Executive Director mmidget@npheadstart.org 51 16th Street Fourth Floor Wheeling WV 26003	Agree	
06-08	Irene Rhodes Owner/Director missirene@breezelink.net Miss Irene's PO Box 947 Martinsburg WV 25402	I also am a big proponent of "sharing" the School Board Teacher with the Center sometimes. Afterall, we are giving you space and time - - we should be allowed to join in, or get some of the Teacher's expertise for the other 4 year olds in the building. This may not be done in a traditional school room, but it is always done in childcare - and thats where	A+

		these programs are currently being housed. Maybe on Monday's when Pre-K is closed, and the Teacher has used her planning time, she could enjoy the other children a little and enhance their days with some of her expertise. That would be so nice.	
§126-(28)-(12) Inclusive Environments			
05-22	Katie Berry Program Coordinator kberry@access.k12.wv.us Monongalia County Starting Points 668 River Rd. Morgantown WV 26505	None	
05-24	Marlene Midget Executive Director mmidget@npheadstart.org 51 16th Street Fourth Floor Wheeling WV 26003	Agree	
06-09	Lisa Ray Coordinator LMRay@access.k12.wv.us Harrison County Schools 408 EB Saunders Way Clarksburg WV 26302	Caseloads should be lower than 20 when in an inclusive environment.	NA - Counties have the option of lower caseloads at the local level
06-11	Karen Cochran Owner kinderhaus@verizon.net Kinder Haus Child Care Center	Very particular attention should be paid to the needs of a 3 YO child that is placed in a 4/5 YO prek classroom. This can have very serious damaging effects on a 3 YO child who is already struggling to "fit in" due to the developmental delay.	No

	129 Greenbag Road Morgantown wv 26501			
§126-(28)-(13) Staff Development and Training				
05-22	Katie Berry Program Coordinator kberry@access.k12.wv.us Monongalia County Starting Points 668 River Rd. Morgantown WV 26505	None		
05-24	Marlene Midget Executive Director mmidget@npheadstart.org 51 16th Street Fourth Floor Wheeling WV 26003	Agree		
05-29	Linda S. Johnson Teacer Assist. kidkare911@yahoo.com RESA V111 Head Start p.o. box 295 Inwood WV 25428	If our school week is extended to a minimum of 16 hours there will be no time for vital staff training and development.	A-	One of many comments from the Eastern Panhandle. Half day programs plus a strong parent components support high quality and are acceptable
05-30	Carla Fluharty Pre-K/Preschool Special Needs Teacher cfluhart@access.k12.wv.us Wetzel County Schools	Thank you for allowing service staff to be included in Pre-K trainings. That has not been allowed in the past in our county.	A+	

	RR1, Box 108 A Metz WV 26585		
06-03	Kathy Chapman pre-kindergarten teacher kechapma@access.k12.wv.us Berkeley County Schools 630 Winchester Ave. Martinsburg WV 25401	13.3 It is important to set the time aside for staff to accomplish meaningful joint planning and I applaud the committee for considering this a worthwhile point. I do see large issues with accomplishing this if the program increases the minimum hours offered to the children from 12 to 16. Currently, in our program, 1 day is set aside, (normally Monday), to accomplish parent meetings, phone calls to parents, planning, training, IEP meetings, etc.	A+
06-05	James A. Chapman preschool special needs teacher jmchapma@access.k12.wv.us Myself PALC 3635 Winchester Ave. Martinsburg WV 25401	13.3 If you go back to 3.18 you have taken away the time for time to be set aside for joint planning. We can only work so many hours in one week. Teachers are to work 7 1/2 hours a day and aides only 7. Not only do we need time for joint planning but also time for parent meetings and doing the Creative Curriculum.	A- One of many comments from the Eastern Panhandle. Half day programs plus a strong parent components support high quality and are acceptable
06-08	Helen Post-Brown Owner/Director HBrown1998@aol.com Sunbeam Child Care Center LLC 1654 Mary Lou Retton Drive Fairmont WV 26554	Staff Development and Training in Marion County b/c of Title I personal has been a wonderful and very positive experience.	A+
06-10	PATTY F CUSTER PATTY W2ZS@AOL.COM BERKELEY COUNTY	I HAVE RECEIVED MUCH TRAINING ON MONDAYS THAT HAS ENHANCED HOW I AM BETTER ABLE TO MEET THE NEEDS OF OUR SPECIAL ED PRE	A 0

<p>SCHOOLS 351 ALLENSVILLE ROAD HEDGESVILLE WV 25427</p>	<p>SCHOOLERS WHAT THEY CONTINUALLY TAKE FROM OUR PROGRAM AFFECTS THEIR LIVES</p>	
<p>06-10 Sharon Phillips srphilli@access.k12.wv.us 235 Manor Drive Martinsburg WV 25403</p>	<p>I receive training on Mondays when I do not have children. If the hours are increased, it will be difficult to attend staff development. It would be expensive for the county to provide substitutes. Young children need consistency, so I want to be in my classroom. I also am at a collaborative site. There are no other Pre-K teachers. It would be impossible to have joint planning if I have children every day.</p>	<p>A- One of many comments from the Eastern Panhandle. Half day programs plus a strong parent components support high quality and are acceptable</p>
<p>06-11 Karen Cochran Owner kinderhaus@verizon.net Kinder Haus Child Care Center 129 Greenbag Road Morgantown wv 26501</p>	<p>I support the training play utilizing the annual ECERSR rating results to assess the training needs.</p>	<p>A+</p>
<p>06-11 Karen Brunicardi Director Of Elementary Schools kbrunica@access.k12.wv.us Wood County Schools 1210 13th Street Parkersburg WV 26101</p>	<p>13.3 Time set aside for joint planning - when? How often?</p>	<p>A o This is a local county decision.</p>
<p>§126-(28)-(14) Program Oversight</p>		
<p>05-22 Katie Berry Program Coordinator</p>	<p>None</p>	

	<p>kberry@access.k12.wv.us Monongalia County Starting Points 668 River Rd. Morgantown WV 26505</p>		
05-24	<p>Marlene Midget Executive Director mmidget@npheadstart.org 51 16th Street Fourth Floor Wheeling WV 26003</p>	Agree	
06-08	<p>Kay Tilton Director, Early Care and Education ktilton@wvdhhr.org WVDHHR/Early Care and Education 350 Capitol Street Room, B18 Charleston WV 25301</p>	<p>14. Program oversight is as essential to improving and maintaining quality as teacher qualifications, professional development, and curriculum standards. A regular monitoring system is needed.</p> <p style="text-align: center;">A o</p>	<p>A regular monitoring system is needed but this policy does not address that need at this time</p>
06-11	<p>Terri Wontrobski Director twontrob@access.k12.wv.us Greenbrier Head Start / Pre-K 202 Chestnut Street Lewisburg WV 24901</p>	<p>Minimum Program Availability Minimum program availability is being suggested to change to a minimum of 16 hours/week. This suggested change would eliminate the possibility of the Head Start combination program option. Part 1306.34 of the Head Start Performance Standards lists the combination program option, the number of class sessions and the number of home visits. Greenbrier County presently has 69 center days and 16 home visits a year. This follows the Head Start Performance Standards. Since 2525 and the Head Start</p>	<p>NA -</p> <p>The issue of 12 vs 16 hours has been addressed in the re-revision. School systems can provide home visits as a part of the pre-k year as per 3. 18.</p>

Performance Standard are purported to align, consideration needs to be given in 2525 for the combination option.

Wording for the 2525 could be a Head Start combination model that follows the Head Start Performance Standard that has been approved by the Head Start regional office will be accepted.

A minimum of 108 instructional days will prohibit programs from having initial home visits and home visits scheduled into their calendar during the year. A recommended number would be 102 instructional days to allow for the home visits.

A minimum of 16 hours per week would require program to have a minimum of three days a week or five half days. In order to have a full time teacher with these hours, programs will have to choose between double sessions of three hours and fifteen minutes a day (2 per day) or a four day a week program. That may well force school districts to choose a four day model while child care would choose the half day model and get child care funding for the remainder of the day. This allows for no flexibility for programs. Fourteen hours a week minimum would permit flexibility of a two day program.

Large rural counties that are providing transportation to children have children with a very long day due to early bus runs and long bus runs. This travel time is very hard four or five days a week for a four year old. Greenbrier Head Start

	<p>did a survey with the families and 85% preferred two or three days with the home visit two times a month. Distances on the bus and gas costss for the distance (if parents drove) are major obstacles for rural counties.)</p>	<p>School districts in WV have set their budgets, plans and timetables for full compliance with 2525 for 2012-2013. The change in the hours per day from 12 to 16 hours will require school districts to now have to re-figure their plan and project additional costs to change from 2 days/week to 4 days/week. This is double the number of staff and classroom. This will all need to be done by 2012. Further, districts with increasing population will now need to provide for the additional classrooms. No funding is provided in 2525 for new construction for additional classroom.</p>	
06-11	<p>Karen Cochran Owner kinderhaus@verizon.net Kinder Haus Child Care Center 129 Greenbag Road Morgantown wv 26501</p>	<p>Allowing LEA's direct responsibility for the public school classrooms in their county has resulted in basic health and safety requirements going unnoticed or ignored and prek classrooms being run as "mini" kindergarten classrooms. Another form of accountability is needed.</p>	NA-
§126-(28)-(16) Program Evaluation for Quality Improvement			
05-16	<p>Jeff Hoover Superintendent jthoover@access.k12.wv.us Tyler Cty BOE</p>	<p>16.1 & 16.2 some verbage that the ecers-r teams should be a mixture of Head Start and LEA members for each evaluated site. That gives a better perspective. Also, ecers-r reviews in no way should include evaluation comments about the quality of teaching. Ratings are to be shared, but personnel comments need to be saved for the employing agency. 16.3 -</p>	<p>A- Revised language in 16.1 addressed this issue.</p>

		excellent.		
05-22	Katie Berry Program Coordinator kberry@access.k12.wv.us Monongalia County Starting Points 668 River Rd. Morgantown WV 26505	I have concern over the local Board of Education bureaucracy (seniority/hiring/firing policy) practices affecting the quality of many of the classrooms. I feel measures to prevent this are not adequately addressed in this portion of the policy. Although the teacher may meet the Personnel Standards discussed in 126-(28)-(7), this does not ensure they are implementing a quality early childhood environment for the students. I feel this is a critical time in a child's learning and by simply following the teacher evaluation process set forth by the county and state (WVBE 5310) board of education policies we are inhibiting the possibility for quick and immediate action for programs that are not of quality. We must hold our Pre-K programs and teachers to a higher standard, if we want to ensure for longitudinal success.	NA -	Policy cannot conflict with state code
05-24	Marlene Midget Executive Director mmidget@npheadstart.org 51 16th Street Fourth Floor Wheeling WV 26003	Agree	A+	
05-29	Cathy Stout Preschool Coordinator ccstout@access.k12.wv.us Jackson County Schools P.O. Box 770 Ripley WV 25271	1.6.1 Regarding ECERS teams - Direct supervision refers to building principals rather than county level directors?	A o	This question was answered by email
06-07	Andrea Campbell Assistant Professor	Our state is fortunate to have Policy 2525. It is a great policy for ensuring quality for our children. I would like to see	A o	

	<p>acampbell@concord.edu Concord University Marsh Hall 104-A Concord University Athens WV 24712</p>	<p>more accountability with Policy 2525 that includes county, school, or teacher consequences for failure to implement the policy.</p>	
06-07	<p>Mary Jo Graham Professor graham@marshall.edu Marshall University School of Education 1 John Marshall Drive Huntington WV 25755</p>	<p>I have concern about the ECERS as the assessment-- depending upon who is completing it and how it is being used. As a program evaluation only it may be helpful if it is administered by highly trained people. However, that has not been the case--teachers have been evaluated and some people administering the ECERS do not have a good understanding of what the various criteria mean. I would recommend that all ECERS evaluators must complete Modules I, II, III before going out! And then they be tested for interrater reliability. Continue looking for better assessments and perhaps pilot the CLAS to see if there is a better way of knowing how the programs operate.</p>	<p>NA - Although the recommendation for training is admirable, it is not realistic at this time.</p>
06-08	<p>Helen Post - Brown President SunbeamCCC@aol.com WVAYC 1654 Mary Lou Retton Drive Fairmont WV 26554</p>	<p>ECERS is a great system for quality improvement. Continued training of reliable assessors should take place.</p>	<p>A 0</p>
06-08	<p>Helen Post-Brown Owner/Director HBrown1998@aol.com Sunbeam Child Care Center LLC 1654 Mary Lou Retton Drive</p>	<p>• ECERS is a great system for quality improvement. Continued training of reliable assessors should take place.</p>	<p>A 0</p>

	Fairmont WV 26554			
06-08	Susan Miller President millers@marshall.edu WVCCU 520 22 Street Huntington WV 25703	<p>• ECERS is a great system for quality improvement. Continued training of reliable assessors should take place.</p>	A o	
06-08	Kay Tilton Director, Early Care and Education ktilton@wvdhhr.org WVDHHR/Early Care and Education 350 Capitol Street Room, B18 Charleston WV 25301	<p>16.2 Please add: The ECERS-R shall not be used as a monitoring tool for determining whether to continue or discontinue a contract for a community partner.</p>	NA -	ECERS -R could be a relevant tool as a part of the determination of whether to continue a collaboration.
06-08	Michele Forsythe Director hfccoffice@wirefire.com Holy Family Child Care & Dev. Ctr. 161 Edgington Lane Wheeling WV 26003	<p>Continue to use ECERS to improve quality and provide training for more assessors to use this good system.</p> <p>ALL children should be safe in all settings. Playgrounds in many BOE sites are not safe for preK children. They should be required to follow the same safety regulations for playgrounds that centers do. This treats all parties involved in these programs fairly.</p>	A-	All settings are held to the same standards. Monitoring and enforcement are the issues.
06-08	Irene Rhodes Owner/Director missirene@breezalink.net Miss Irene's PO Box 947	<p>If my comments all seem to revolve around money, well, thats because they all revolve around money - - and the loss of money to Directors and Owners. Please listen. Please try harder. We can't afford this.</p>	NA -	Local contracts are a local issue. This was not a statewide concern.

	Martinsburg WV 25402			
06-11	Karen Cochran Owner kinderhaus@verizon.net Kinder Haus Child Care Center 129 Greenbag Road Morgantown wv 26501	I strongly support the new language.	A+	
§126-(28)-(2) Guidelines				
05-15	Melissa Anderson PK Teacher mcanders@access.k12.wv.us Lewis County BOE RT.2 Box 196V Jane Lew WV 26378	2.1.11. Preferred class size 12-15 students with one certified teacher and one teacher's aide. Allows staff to meet ALL needs of ALL students (Example: social, emotional, and educational needs)	NA	Class size and ratios meet the standards of the National Association for the Education of Young Children.
05-22	Katie Berry Program Coordinator kberry@access.k12.wv.us Monongalia County Starting Points 668 River Rd. Morgantown WV 26505	None		
05-24	Marlene Midget Executive Director mmidget@npheadstart.org 51 16th Street Fourth Floor Wheeling WV 26003	2.1.5- What does "curricular frameworks" mean	No	

<p>06-03</p>	<p>Brenda Riffe Pre-K teacher w/ special needs Briffe@kcs.kana.k12.wv.us Kanawha County Schools Lakewood Elem. Penn. Ave. St. Albans WV 25177</p>	<p>Changing the hours to 16 hrs per week seems a little impossible. Will we be going back to a five day weeks every week with no staff development or other training? I also am very concerned with the no planning period, no lunch and no time to enter our jots and observations into the CC net. Spending weekends and evenings doing this redundant paper work and planning has cost us many teachers again this year. WV Pre-K is the greatest thing we have done for education!</p>	<p>A - Addressed in 3.18</p>
<p>06-08</p>	<p>Suzy Mastrantoni prek teacher smastran@access.k12.wv.us 160 South 12th Street Weirton WV 26062</p>	<p>There is a tremendous amount of extra planning and paper work that goes into a preschool program. If there is an up in the hours, this may decrease the quality of the programs, due to a lack of time.</p>	<p>A - Addressed in 3.18</p>
<p>06-08</p>	<p>Helen Post - Brown President SunbeamCCC@aol.com WVAYC 1654 Mary Lou Retton Drive Fairmont WV 26554</p>	<p>• Many quality collaborations are taking place all over the state. But, there are many that are not getting adequate funding to support their program. All child care centers should receive adequate funding to support their centers. • The LEA shall provide funding for the community program to hire the pre-K teacher if the community programs prefer this model to the model of having a teacher placed by the LEA. • 2525 states that by 2013 we will only be able to hire Pre-K teachers with certification. We do not support this change due to the fact that there is a predicted shortage of certified Pre-K teachers; therefore we need to continue hiring teachers who are approved to be on permit until there is no longer a shortage. • 2525 states Pre-K childcare programs cannot charge for Pre-K hours, therefore there needs to be a system in place</p>	<p>How collaborations are funded is a local issue. Changes were made in the revised section 7 to address these concerns.</p>

	<p>that would reimburse for all Pr-K hours or allow childcare centers to charge for service.</p>		
<p>06-08</p>	<p>Helen Post-Brown Owner/Director HBrown1998@aol.com Sunbeam Child Care Center LLC 1654 Mary Lou Retton Drive Fairmont WV 26554</p>	<p>• Many quality collaborations are taking place all over the state. But, there are many that are not getting adequate funding to support their program. All child care centers should receive adequate funding to support their centers. • The LEA shall provide funding for the community program to hire the pre-K teacher if the community programs prefer this model to the model of having a teacher placed by the LEA. • 2525 states that by 2013 we will only be able to hire Pre-K teachers with certification. We do not support this change due to the fact that there is a predicted shortage of certified Pre-K teachers; therefore we need to continue hiring teachers who are approved to be on permit until there is no longer a shortage.</p>	<p>How collaborations are funded is a local issue. Changes were made in the revised section 7 to address these concerns.</p>
<p>06-08</p>	<p>Susan Miller President millers@marshall.edu WVCCU 520 22 Street Huntington WV 25703</p>	<p>• Many quality collaborations are taking place all over the state. But, there are many that are not getting adequate funding to support their program. All child care centers should receive adequate funding to support their centers. • The LEA shall provide funding for the community program to hire the pre-K teacher if the community programs prefer this model to the model of having a teacher placed by the LEA. • 2525 states that by 2013 we will only be able to hire Pre-K teachers with certification. We do not support this change due to the fact that there is a predicted shortage of certified Pre-K teachers; therefore we need to continue hiring teachers who are approved to be on permit until there is no longer a shortage.</p>	<p>How collaborations are funded is a local issue. Changes were made in the revised section 7 to address these concerns.</p>

		longer a shortage.		
06-09	Helen Brown Director HBrown1998@aol.com Sunbeam Child Care Center 1654 Mary Lou Retton Drive Fairmont WV 26554	<ul style="list-style-type: none"> Many quality collaborations are taking place all over the state. But, there are many that are not getting adequate funding to support their program. All child care centers should receive adequate funding to support their centers The LEA shall provide funding for the community program to hire the pre-K teacher if the community programs prefer this model to the model of having a teacher placed by the LEA. 2525 states that by 2013 we will only be able to hire Pre-K teachers with certification. We do not support this change due to the fact that there is a predicted shortage of certified Pre-K teachers; therefore we need to continue hiring teachers who are approved to be on permit until there is no longer a shortage. 	A-	How collaborations are funded is a local issue. Changes were made in the revised section 7 to address these concerns.
06-11	Lynn Boyer Executive Director lboyer@access.k12.wv.us WVDE	reinstated "provide the building blocks for literacy"		2.1.4 was reinstated
06-11	Christine Mayman Executive Director cheersd@verizon.net CHEERS School Family, Inc. PO Box 344 KEarneysville WV 25430	This policy needs to establish firmly the importance of preK literacy as a part of the Department's initiative to start early and continue across grades with literacy initiatives and accountability. ECERS is a great system for quality improvement. Continued training of reliable assessors should take place.	A o	
§126-(28)-(3) Definitions				

05-15	<p>G. Ronald Brown Director grbrown@access.k12.wv.us Office of Sp. Ed., Berkeley Special Education Berkeley County Martinsburg WV 22611</p>	<p>126-28-3. Opposed to increased time. Programs are growing and we would not be able to accommodate this increase in time and continue to grow the program. This little time added would not be sufficient to enhance the program when compared to the issues created by this change. A- Thanks</p>	<p>One of many comments from the Eastern Panhandle. Half day programs plus a strong parent components support high quality and are acceptable</p>
05-16	<p>Dean Warrenfeltz Principal dwarrenf@access.k12.wv.us Berkeley County Schools 650 Winchester Ave Martinsburg WV 25401</p>	<p>Changes to the minimum number of hours for attendance in the program are not feasible within the time constraints and without a huge financial impact.</p> <p>Our Pre-K teachers need Mondays to prepare for quality Pre-K activities for the week, to meet with parents, and to complete the monumental task of inputting observations for cc.net. We do not want to increase hours of the program at the expense of the quality of the 12 hours that students now attend.</p> <p>A- No students on Mondays has provided opportunities to present on-going, research based staff development to all the personnel working with the Pre-K program. These days have also been used for Evaluation and IEP meetings for our Pre-K Special Needs population. Special needs teachers have the additional duty of performing developmental testing for all referred children and writing eligibility reports. They also draft IEP's for the IEP committees' usage and conduct meetings with parents to update existing IEP's.</p>	<p>One of many comments from the Eastern Panhandle. Half day programs plus a strong parent components support high quality and are acceptable</p>

The change could impact child care centers with agreements/contracts to be a part of the program in terms of space utilization for meals and before and after care.

The change impacts transportation and increases the expense of the transportation service for those programs that offer it or are required to provide it.

Some parents may not want to have their child attend an extra day or a full day. A number of parents have sought out a part-time program because they want to enjoy some time at home with their child, want to have a day a week to schedule their child's appointments, etc. or feel that their child would do better in a half-day setting.

The change impacts Head Start and the provision of the required home visits, etc.

There are concerns about the financing and supply and demand issue of providing substitutes for cc.net data entry as well as the impact that providing substitutes would have on the routines of Pre-K children.

There is an issue with extending the day at Pikeside and convergence of traffic with transitional school.

All these impacts indicate that it is not in the best interest of our Pre-K program to increase the attendance hours.

05-16	Jeff Hoover Superintendent jthoover@access.k12.wv.us Tyler Cty BOE	<p>3.12 leave in the section where a teacher and parent can determine if a child needs a 2nd year, or not.</p> <p>3.12 It seems as though this section of the policy is putting more emphasis on chronological age rather than developmental readiness. There are many factors that influence developmental readiness: gender, prematurity, malnutrition, and low birth weight just to name a few. It is apparent that all children don't crawl, walk or talk at the same time yet it is now being mandated that all children, except those who have some sort of exceptional ability are ready to learn at the same time. Our classrooms in pre-k and kindergarten are developmentally appropriate to all learners; yet, once students leave kindergarten they must have the skills necessary to be successful learners. Also, with No Child Left Behind, kindergarten students are given informal math assessments and DIBELS. A child who is not able to focus and attend or a child who cannot cope emotionally may experience difficulty. There are some children who are late bloomers and require that extra year at home to mature. Who better to make that decision for their child than a parent. This section of the policy takes that decision away from the parent. Pre-school is a wonderful opportunity for children to develop social skills such as taking turns, sharing and playing. It gives the children extended rest time and down time which may be important for children with short attention spans. I understand that sometimes pre-kindergarten evaluations have been used to target students</p>	The former language of this section was reinstated
05-17	Tonya Blackburn Kindergarten Teacher tblackbu@access.k12.wv.us Harrison County Schools 208 Kidd Ave. Stonewood WV 26301	<p>A-</p> <p>A-</p>	The language was reinstated to address these concerns.

05-18	<p>Scott Cochran scochran@access.k12.wv.us 1189 erbacon rd. cowen wv 26206</p>	<p>who may benefit from a year in pre-k before attending kindergarten. I believe most teachers who recommend this to parents are only giving advice based on what would be in the best interest of the child. A parent must first agree with the teacher before a child is placed in pre-k instead of kindergarten. If the parents do not agree, then the child will ultimately be placed in kindergarten. Once again, most recommendations for children are in the best interest of the child. Children who turn 5 years old in late August may not be socially comfortable with students who turn 5 in early September. There is a year's difference between these children. Some parents consider the big picture when making the decision to wait a year before sending their child to pre-school. These reasons may include the fact that their child may become a follower to the older students instead of have the leadership qualities that older students possess. Also, some will be going to college at 17 years old instead of 18. Parents should be the ultimate decision makers when it comes to their child, not a policy. It would seem more logical if the policy made some sort of accommodations for children who are not developmentally ready for pre-k at 4 years old. Chronological age should not be the ultimate criteria for school entrance.</p> <p>I feel as a Parent and a High School Administrator that the proposed policy changes are not what is in the best interest of 4 or 5 year old children. Just because my son is five years old and attended a pre-k program this year doesnt make him ready to attend Kindergarten. I and his teacher know what is in the best interest for him not this policy. Because of social or maturity issues i should be able to decide what is best for</p>	A-		<p>The language was reinstated to address these concerns.</p>
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<p>Education klhough@access.k12.wv.us Berkeley County Schools 401 S. Queen St. Martinsburg WV 25401</p>	<p>The reduction of a teacher caseload per day from 40 to 30 is a concern. This means that we will have to provide 25% more staffing to implement Pre-K programs. In addition to being a financial concern while we are purchasing furniture and curriculum materials to set up numerous new classrooms, locating 25% more highly qualified staff while competing with surrounding out-of-state districts will be challenging.</p>	<p>exceed those for other teachers of children in pre-k/elementary settings. This change is necessary for teachers to adequately meet the needs of all children.</p>
<p>8.7</p>	<p>Currently EPSDT services are not offered through our county health department. It is unclear whether or not local physicians and the health department will be able to complete the vision, hearing, speech, dental, and developmental screenings as well as the physical examinations. Because of the growth of the community, health services are also in great demand.</p>	<p>Three year olds without IEPs are not included in the state aid funding formula as per W. Va. Code §18-5-44</p>
<p>05-29</p>	<p>3.12 - Regarding the statement that three year old children can be included if they meet the enrollment guidelines of the community partner: If childcare or Head Start are our collaborative partners and they enroll three year olds without IEPs, then are those children eligible for state aid formula? If so and we are to have universal enrollement, could these same three year olds not attend any program in the county that is part of the collaborative, including LEA programs if parents request? It seems that any three year old</p>	<p>NA o A o</p>

	<p>my son and not driven by this policy change. I also feel that reasons for permitting another year of pre-K is driven way to much by Special Ed. policies. We as educators should do what is best for the 4 or 5 year old now and not set them up for failure down the road.</p>		
05-22	<p>Katie Berry Program Coordinator kberry@access.k12.wv.us Monongalia County Starting Points 668 River Rd. Morgantown WV 26505</p>	<p>I question the decision to not include 5 year old children in the classroom, if they have not previously been in the Pre-K program. I have many friends and colleagues who have expressed concern over the situation of a child with a "late" birthday-turning 5 in August/July, whom they feel may not be ready for the Pre-k and Kindergarten environments based on the September 1st cutoff. If the parents delay entry into Pre-K the first year, they have no option if they make the decision to delay Kindergarten as well. I feel an exception should be made for children and families in this situation</p>	<p>The language was reinstated to address these concerns.</p>
05-22	<p>Paula Ellison Preschool Special Needs Teacher pellison@access.k12.wv.us Universal Pre-K 108 College Drive Peterstown WV 24945</p>	<p>Eligible Child - Please clarify if a speech (only) IEP is enough documentation to support the need for a five year old child to repeat pre-k.</p>	<p>Referred to Ginger Huffman, Preschool Special Needs Coordinator</p>
05-24	<p>Marlene Midget Executive Director mmidget@npheadstart.org 51 16th Street Fourth Floor Wheeling WV 26003</p>	<p>3.12 Change wording from including toilet training to "or" toilet training. Currently it reads as if toilet training is a developmental delay. Child remaining in program for longer than 1 year-does this contradict HS Perf. Standards? 3.26 -Agree</p>	<p>Wording changed</p>
05-29	<p>Kim Hough Assistant Director of Special</p>	<p>8.2</p>	<p>Caseloads for pre-k teachers far</p>

		<p>could be included with few exclusions.</p> <p>Regarding the statement that only IEP children may be in pre-k as five year olds: Is the statement following the IEP statement listing who must be a member of the determining team intended to define the EC/IEP group or another team that could place other five year olds in PRRe-K? This is unclear. If it is the 2419 multidisciplinary evaluation team or EC/IEP team, this document does not need to define those members. Regardless of which children the team is to address, it should say "specialist(s)" in the areas of concern. Not every child needs a behavior support specialist and many need other types of specialists.</p> <p>Regarding 3.16 - Do children no longer have to have developmental screening?</p> <p>Regarding 3.18 Minimum hours should be 14 or 15. We have many parents that only want two days and two whole school days work best for them with other children in school. School days for children are usually 7-71/2 hours. Plus, schools are required to provide transportation to IEP children. You will bankrupt counties requiring them to put buses on the road for four trips per day (mid-day runs). Sixteen hours would only be possible in four 1/2 days.</p>	<p>NA -</p>	<p>Language is this section has been clarified</p> <p>Developmental screenings are still required</p> <p>Frequency and intensity of pre-k are directly related to the effectiveness of the readiness intervention.</p>
05-30	<p>Carla Fluharty Pre-K/Preschool Special Needs Teacher cfluhart@access.k12.wv.us Wetzel County Schools</p>	<p>I have a real concern with parents not being allowed to exercise their right as a parent to keep their child in a Pre-K program a second year. Some children do not have the maturity they need for Kindergarten. They do not necessary, and in most cases to not have a special need. I don't think</p>	<p>A -</p>	<p>This language was changed to address this concern 3.18</p>

<p>RR1, Box 108 A Metz WV 26585</p>	<p>parents or teachers should lose the chance to help a child mature with another year of pre-k.</p> <p>I am glad to see a change in contact hours. I am not sure that it is enough to keep administrators from making changes that can hurt. I had an administrator comment to me that the Pre-k positions could be changed to half time positions. A half time employee according to him does not have to be given planning.</p>	<p>Local county administrators have jurisdiction over staffing and hiring</p>
<p>05-31</p> <p>Robin Romano rgse02241@mail.wvnet.edu P.O. Box 9 Cowen WV 26206</p>	<p>I am writing in response to pre-school teachers not being allowed to take five year olds. If not for my sons preschool teacher being able to take him he would have had to go on to kindergarten and be the youngest in his class, and perhaps having trouble and being retained. Now he is in the fourth grade and making either the A or B honor roll and enjoying his friends and classwork. Please do not take the decision to hold a child back in preschool away from the teachers just because a child is five years old, some children grow and mature at a different rate than other children and need the extra year in preschool to help them adjust and become socially acclimated because they are shy or they are the youngest in their group. Please reconsider this decision you are making regarding the children of this state.</p> <p>A-</p>	<p>The language in 3.18 was changed to address this concern.</p>
<p>06-01</p> <p>Claudia Martin Teacher cmartin71@aol.com RESA VIII/Head Start 13702 Woodland Hts. Dr. Hagerstown MD 21742</p>	<p>As a teacher in the pre-k/head start program I must implore you to reconsider increasing the minimum number of hours for a child to attend the program. Many of the children have never experienced formal education and to increase the number of hours they attend could be detrimental to their achieving their full potential because of fear. One of the guidelines you encourage is parent/family involvement and</p> <p>A-</p>	<p>One of many comments from the Eastern Panhandle. Half day programs plus a strong parent components support high</p>

<p>quality and are acceptable</p>	<p>accepting each child as part of a family. Our program requires a minimum of 2 home visits a year, 2 formal parent conferences and active parent participation. If the children's day is lengthened, it will take away from the time teachers have to do home visits where we actively show the parents how to be involved in their child's learning experiences. Lengthening the day will also have an effect on the continued training of the staff as we are required to have training and to expect all of the continued ed training to be done on the employee's personal time is unrealistic. Please reconsider this decision for the welfare of these early learners.</p>	
<p>The language was changed in 3.18 to clarify and remedy these concerns.</p>	<p>Regarding 3.12 Eligible Child - Does the final sentences ("The child may remain in the program for longer than one year if the decision is in the best interest...") apply to children WITHOUT IEPs? Since it follows that sentences regarding special needs, I was assuming not. However, if it does apply to all students, perhaps the statement could be worded to indicate that it is. If it DOES NOT apply to children WITHOUT IEPs, I would like to see that changed to include ALL children in the classroom. We occasionally have students (i.e., children with summer birthdates) that are not ready for the kindergarten experience for a variety of educationally sound reasons, and parents do not want them to attend and risk a possible retention. Most parents want their children to begin their academic education with the best foundation possible. While I agree that the decision should be based on best interest and curricular assessment data and not just parents, it should be a decision available to all preschool students not just those with IEPs. Lastly, in my</p>	<p>Tammy Clarkson Preschool Teacher tclarkso@access.k12.wv.us HJK Elementary 803 Kaiser Avenue Ravenswood WV 26164</p> <p>06-01</p> <p>A-</p>

	<p>experience, kindergarten teachers do not agree with policies that send a child to kindergarten solely based on age (i.e. Head Start sending them because they cannot service them if they are school age) because these policies do not look at the best interest of ALL children, especially when 4 day programs are available. These types of policies are where we begin leaving children behind!</p>		
<p>06-01</p>	<p>3.7 needs to read "LICENSED provider of early childhood services.</p> <p>3.10 should read substantial portion of the day AS DEFINED BY ECERS-R"</p> <p>Substantial is open to interpretation.</p> <p>3.12 The first underlined portion utilizes IEP to resolve eligibility issues. The last two sentences, starting with "In a WV pre-k classroom" contradicts the earlier statement that IEP is the determining factor.</p> <p>3.13 "OBSERVER" is used. In 2.1.9, the term EVALUATOR is used. The language needs to be consistent.</p>	<p>Nicholas County Early Learning Collaborative mrDavis@access.k12.wv.us 400 Old Main Drive Summersville WV 26651</p>	<p>NA-</p> <p>A-</p>
<p>06-03</p>	<p>In section 3.148 Regarding program availability: While it is important to provide as much time as possible, I strongly disagree with increasing the minimum hours to 16 per week. Our county already operates our programs for four days per week for three hours each day. The day offers two back-to-back sessions with only one-half hour in between. During that 30 minute span, often parents are late picking up their children, need some of our time in regard to discussion of issues with their child, my aide and I must "set-up" for the next class and take our only break. On Mondays, the day with no classes, we work from beginning until end planning.</p>	<p>Kathy Chapman pre-kindergarten teacher kechapma@access.k12.wv.us Berkeley County Schools 630 Winchester Ave. Martinsburg WV 25401</p>	<p>Changes reflect the concerns regarding eligibility issues and language of observer vs evaluator</p> <p>One of many comments from the Eastern Panhandle. Half day programs plus a strong parent components support high quality and are acceptable</p>

	<p>preparing the materials for the next week, working with parent meetings or phone calls, attending IEP meetings, and we often are in training sessions particular to the Pre-k program. It has been suggested that if we are mandated to extend our hours to 16 that a substitute will be available to cover the class so that we can attend training or work with planning. I can't tell you how much disaster I see looming! Firstly, I am concerned with the overall decline of the quality of the program if the program is handled by a substitute unqualified to work with preschool children. Secondly, in our area there are not enough substitutes for employment, let alone qualified personnel. I urge you to reconsider the hours and leave them as they currently stand.</p>		
<p>06-05</p>	<p>James A. Chapman preschool special needs teacher jmchapma@access.k12.wv.us Myself PALC 3635 Winchester Ave. Martinsburg WV 25401</p>	<p>3.18 The increase of the hours will take away the time needed to plan, do the Creative Curriculum on the web. Also the time needed to meet with parents and do the evaluations and IEPs. Also the time added on will take away the time needed for 13.3 time set aside for joint planning.</p> <p style="text-align: right;">A-</p>	<p>One of many comments from the Eastern Panhandle. Half day programs plus a strong parent components support high quality and are acceptable</p>
<p>06-05</p>	<p>Jennifer Dieter Secretary jdieter@access.k12.wv.us Berkeley County Schools 210 Care Bear Drive Martinsburg WV 25401</p>	<p>As a secretary I see the work that goes into preparing and setting up testing to the special needs pre-k program. The teachers and staff need to have Mondays to allow time for meeting with the children to evaluate them. If the the hours are increased there would not be adequate time to evaluate the students. The teachers would not be able to have ample time to do there preparation needed for these students. There would be an impact on the training that is required and</p> <p style="text-align: right;">A-</p>	<p>One of many comments from the Eastern Panhandle. Half day programs plus a strong parent components support high quality and are</p>

		<p>would not allow time to do so. Transportation will be affected by the change in hours as well as the cost. Other programs located in the buildings would be affected with traffic difficulties and parking issues. Changing to a full day program to meet the hours increase would affect the students because we would not be able to serve as many students as we are currently able to serve. I believe that it is in the best interest of all involved that the preschool hours stay the same and not be increased so that we can continue to provide our students with the best education and be able to meet the specific needs that are required for our students.</p>		acceptable
06-06	<p>Penny Olmstead EISE bpcmolmstead@aol.com Brooke county Pre-School RD3 Box 610 Bruin Drive Wellsburg WV W 26070</p>	<p>I have concerns that increasing the hours to 16 hours per week. Being a 5-day program and servicing an a.m. and p.m. class, to meet the requirements students will need to be in attendance 3.25 hours per week (3 hours and 15 minutes). We barely have time for lunch and no time for prep or collaboration. Who will monitor this?</p>	A-	<p>One of many comments from the Eastern Panhandle. Half day programs plus a strong parent components support high quality and are acceptable</p>
06-07	<p>Mary Jo Graham Professor graham@marshall.edu Marshall University School of Educationq 1 John Marshall Drive Huntington WV 25755</p>	<p>I would add a definition of caseload used in section 8.2. A caseload of 30--does this mean in different morning and afternoon sessions or does it mean a teacher can oversee two rooms with 15 children each at the same time?</p>	No	
06-07	<p>Terry Riley Director</p>	<p>The area of greatest concern with the proposed Policy revision is listed below:</p>	A-	<p>One of many comments from the</p>

tjriley@access.k12.wv.us
Morgan County Schools
247 Harrison Ave
Berkeley Springs WV 25411

"3.148. Minimum Program availability means offering each preschool class a minimum of 16 hours per week and a maximum of 28 hours per week during the school year calendar for no less than 108 instructional days per school year."

Morgan County currently offers six classrooms that meet for 3.5 hours per day four days a week for a total of 14 hours. This is in addition to one classroom that meets 6.5 hours per day based upon transportation needs. In 2007-08 we will actually expand to one additional half-time classroom with a new community partner.

To meet the new minimum hour standard, these classes would have to increase to four hours per day. This would total an eight-hour day for teachers which is a half-hour over their maximum required work day.

Options to meet this standard would be to only have all day classes, hire additional part-time staff to address extended day services or meet five days a week.

These options all would require increased costs to community partners and the school system and/or a reduction of services to students as fewer classrooms could be offered. Going to a five-day setting would also require additional staff or limit services to students. Currently this day is used to conduct Head Start required home visits and work with their home-based students. It is also used to

Eastern Panhandle.
Half day programs plus a strong parent components support high quality and are acceptable

	<p>provide required collaborative planning, transition planning with kindergarten teachers and other required training sessions without disrupting the educational process.</p> <p>Maintaining the minimum hours at 12 per week would not preclude anyone from offering more services to meet the specific needs of their students. However, increasing the minimum will have major impacts on larger counties and growth counties.</p> <p>Morgan County is working hard to make Universal Pre-Kindergarten work for all parents and students. We currently go above and beyond by providing two additional hours per week. This proposed change could actually cause us to reduce services instead of allowing us to continue to expand our program.</p>		
06-08	<p>Helen Post - Brown President SunbeamCCC@aol.com WVAYC 1654 Mary Lou Retton Drive Fairmont WV 26554</p>	<ul style="list-style-type: none"> The term, "Collaborative classrooms" needs to be clarified. Presently we have different models all over the state. Suggestion: Collaborative classrooms shall be defined as classrooms operated by community programs with financial support from the state through LEA." 	NA o
06-08	<p>Helen Post-Brown Owner/Director HBrown1998@aol.com Sunbeam Child Care Center LLC 1654 Mary Lou Retton Drive Fairmont WV 26554</p>	<ul style="list-style-type: none"> The term, "Collaborative classrooms" needs to be clarified. Presently we have different models all over the state. Suggestion: Collaborative classrooms shall be defined as classrooms operated by community programs with financial support from the state through LEA." 	NA o

06-08	<p>Susan Miller President millers@marshall.edu WVCCU 520 22 Street Huntington WV 25703</p>	<p>• The term, "Collaborative classrooms" needs to be clarified. Presently we have different models all over the state. Suggestion: Collaborative classrooms shall be defined as classrooms operated by community programs with financial support from the state through LEA."</p>	NA o
06-08	<p>Kay Tilton Director, Early Care and Education ktilton@wvdhhr.org WVDHHR/Early Care and Education 350 Capitol Street Room, B18 Charleston WV 25301</p>	<p>3.18 The increase in program availability should improve school readiness. Two day programs, in particular, may offer limited improvements when you consider length of time between classes when absences or holidays occur.</p> <p>3.5. The definition of collaborative setting does not adequately address the intent of law or policy. Suggested wording is: "Collaborative setting means a classroom of WV Pre-k children operated by a community program with financial support from the state through LEA., or a classroom operated jointly by a community program and the LEA.</p>	A+
06-09	<p>Lisa Ray Coordinator LMRay@access.k12.wv.us Harrison County Schools 408 EB Saunders Way Clarksburg WV 26302</p>	<p>Good to set the minimum and maximum number of hours the pre-k program may operate. Excellent to state that 5 year olds should go to Kindergarten instead of pre-k.</p>	No
06-09	<p>Linda Ms. bandvs@gmail.com Bunce PO Box 608</p>	<p>Creative Curriculum is required by most counties, and policy requires face to face conferences with parents at least 2 times per year. However at current caseloads, 40, or even at the proposed maximum caseload of 30, it will not be possible to schedule this many conferences in the one non-</p>	A - Caseload and home visiting/ conferencing time has been address

	Cool Ridge WV 25825	<p>instructional day per checkpoint given by Raleigh county. As of this coming year, our county no longer includes a home visiting component. It would be helpful if the state could mandate that enough time be given to at least allow face-to-face conferences for the caseload. Reasonably, one cannot meet with more than 10 families per day. So requiring at least 3 non-instructional days per checkpoint would make it possible to actually comply with this mandate, and it's purpose. The school system in general does not get the value of getting to know families-by defining a required and reasonable time to meet with families, you will be ensuring that the family component can still happen.</p>		
06-09	<p>Helen Brown Director HBrown1998@aol.com Sunbeam Child Care Center 1654 Mary Lou Retton Drive Fairmont WV 26554</p>	<p>• The term, "Collaborative classrooms" needs to be clarified. Presently we have different models all over the state. Suggestion: Collaborative classrooms shall be defined as classrooms operated by community programs with financial support from the state through LEA."</p>	NA -	Collaborative classrooms are adequately defined
06-09	<p>Mary Montgomery Special Education Coordinator memontgo@access.k12.wv.us Berkeley Co Schools 515 W. Martin St. Martinsburg WV 25401</p>	<p>Raising the minimum number of hours to 16 per week from 12 hours per week will be extremely difficult for large growing counties such as Berkeley - we do not have enough facilities in our area. We offer a quality program in Berkeley County and I do not want to see it sacrificed - our teachers use their time very wisely. They need time to assess the children for the program as well as attending eligibility meeting and preparing IEPs. Creative curriculum also is a time consuming endeavor which must be done as well. Please, do not take their valuable time away from them which would surely take away from the quality of the</p>	A- One of many comments from the Eastern Panhandle. Half day programs plus a strong parent components	

	program.	support high quality and are acceptable	
06-10	<p>3.148 I have been a principal of a pre-school in both the private sector and now the public schools for nine years. You are setting up failure and total chaos to move from 12 hours a week to 16 hours a week. There is no way possible to have more than one session a day in the pre-school. It is great for the teacher to have that time for computer work and preparation if we only hold one session five days a week. In Hancock County we have little if no space left to begin more pre-k classes if each one of classes would have to have mirror classes to support the change from half day to three-quarter days. It would also not be economically feasible to only have a teacher for such a small number of students. This number must be adjusted for the financial implications and the scheduling implications it will have on the county. I can not imagine this here in our county, yet alone some of the other counties in our state. Please reconsider the hours a day!</p>	A-	Addressed in 3.18
06-10	<p>Suzanne Viski Director of Special Services sviski@access.k12.wv.us Taylor County Schools P. O. Box 160 82 Utt Drive Grafton WV 26354</p>	A-	New language in 3.12 addresses these concerns.

	<p>working in the schools, I do not recommend that only IEP eligible students have this option. The public schools do not limit "retentions" in other grades (K through 12) to only IEP eligible students. I believe this option should be available to every level of the educational system. There are be valid reasons for non special education eligible students to remain in preschool. I agree there should be a process to review data in making this determination and that children need to be assessed for special education if the student is not progressing at the rate expected.</p>	
<p>06-10</p>	<p>Sharon Phillips srphilli@access.k12.wv.us 235 Manor Drive Martinsburg WV 25403</p>	<p>I am concerned that the minimum hours are being changed from 12 to 16. My class currently attends 12 hours a week. They actively participate in the class room activities and rest at home. Even attending 12 hours, the children are tired by Friday. I do not think it is in their best interest to be in class longer. I currently teach in a collaborative setting at a day care. The day care provides an aide only when the children are present. The aide interacts with the children when she is present. I am responsible for the preparation of all the activities. Since we do not use text books, it takes a great deal of time to prepare for class. Creative Curriculum also demands a great deal of time to document the children's progress. I currently have no children on Mondays. I can not get all the required work done at present. I work after hours and at home. If my preparation day is taken away, it would be impossible to do the required work. I would consider leaving Pre-K.</p>
<p>06-11</p>	<p>LaDonna Rosencrance Pre K Special Needs Teacher lrosencr@access.k12.wv.us</p>	<p>Randolph County Collaborative team have a concern with the 28 maximum hours per week. Starting in Fall 2007, all 11 of our classrooms will be full day. The classrooms are for</p>
	<p>A -</p>	<p>One of many comments from the Eastern Panhandle. Half day programs plus a strong parent components support high quality and are acceptable</p>
	<p>A -</p>	<p>The maximum hours have been changes to 30 to</p>

06-11	<p>Randolph Co. BOE 40 Eleventh St Elkins WV 26241</p>	<p>7 1/2 hours a day for 4 days a week. The children can ride the bus to school with the other children. If we are limited to 28 hours we might have to cut our program to 3 days per week, or not provide transportation for families that need it. Randolph County has come a long way with Pre K. In the Fall of 2007 all 11 of our sites will be collaborative sites with FRC services provided to all children. We used universal application process this year. Please consider changing the maximum number of hours per week.</p>		address this concern.
06-11	<p>Karen Cochran Owner kinderhaus@verizon.net Kinder Haus Child Care Center 129 Greenbag Road Morgantown wv 26501</p>	<p>Changing the hours of prek operation would be an undue hardship on centers with existing collaborations. Also, changing hours will cause a financial hardship on centers due to fewer billable hours remaining.</p>	A-	Hours changed in 3.18 to minimum 12 maximum 30
06-11	<p>Kim Mullenax mxfarm@citynet.net Route 1, Box 208 Parsons WV 26287</p>	<p>Section 3.12 - should be left as is and no changes made. Any decisions regarding five year olds attendance and four year olds holding over one year should be left as is. Parents of any five year old that has not previously been enroll in a pre-k program should be able to decide whether to place their children in pre-school or kindergarten based on the readiness of the child.</p>	A-	Language in 3.12 has been reinstated
06-11	<p>Melanie Clark Director, Quality Initiatives melanieclark@wvdhhr.org WV DHHR 350 Capitol Street, rm B-18 Charleston WV 25301</p>	<p>The definition of collaboration needs to be strengthened.</p>	NA-	Language regarding collaboration is well defined

3.12 "Three year old children can be included in collaborative classrooms if they meet the eligibility requirements [IEP] of this policy or, in a collaborative classroom, the guidelines for enrollment of the collaborative community partner." Although not specifically stated, it is assumed that this allows flexibility for private preschools to continue to enroll and serve children younger than three years old. However, if said preschool has entered into a collaborative agreement with a local education agency, three year olds without IEPs will not be able to be counted by the LEA in the funding formula. Therefore, those preschool collaboratives should be serving only those students that are eligible under both the private and public guidelines to be considered a universal program.

Lisa Martin
Director of Special Education
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Jackson County Schools
PO Box 770
Ripley WV 25271

06-11

A-

Language in 3.12
has been reinstated
and clarified

Consistent with § 18-2-5, mandatory school age is six years of age. Additionally, school readiness of children varies depending on birth date and developmental level. Therefore, parents and school teams should have the flexibility of determining whether or not a child is ready to move on to kindergarten or should remain in preschool rather than mandating that five year olds transition to kindergarten. Additionally, the required composition of the 'team' to provide intervention/assessment for determination of five year olds allowed to remain in kindergarten is narrowly defined and does not comprise a multi-disciplinary evaluation team. A 'practicing pre-k teacher' would be the child's "current" teacher. If a decision is being considered as to whether the child is to transition to kindergarten, he/she would not yet have a kindergarten teacher. A behavior

		<p>support specialist may or may not be a relevant member depending on whether social/emotional and behavior issues are a developmental area of concern. This requirement seems to be restrictive and exclusive and may be based upon Head Start or other agency practices rather than considering the applicability to the school setting.</p>		
06-11	<p>Karen Brunnicardi Director Of Elementary Schools kbrunica@access.12.wv.us Wood County Schools 1210 13th Street Parkersburg WV 26101</p>	<p>3.16 HealthCheck form is cumbersome, doctors/medical professionals will not want to take time to fill out properly. 3.18 Maximum of 28 hours/week will not be enough for counties that follow their regular public school schedule for attendance days. Don't give a maximum.</p>	<p>A- NA -</p>	<p>HealthCheck is supported by WVDE, WVDHHR and the Governor's office. The policy does not require HealthCheck Maximum are necessary to allow time for parent support, planning, and assessment</p>
06-11	<p>Christine Mayman Executive Director cheersed@verizon.net CHEERS School Family, Inc. PO Box 344 KEarneysville WV 25430</p>	<p>The term, "Collaborative classrooms" needs to be clarified. Presently we have different models all over the state. Suggestion: Collaborative classrooms shall be defined as classrooms operated by community programs with financial support from the state through LEA."</p>	<p>NA -</p>	<p>Collaborative classroom is defined</p>
06-11	<p>Teresa Betler betfert@yahoo.com hc 64 box 86</p>	<p>I feel the right for a five year old cutoff for preschool is wrong. Parents have the right to make a decision on whether or not their child is or is not ready. I dont feel you can</p>	<p>A-</p>	<p>Language in 3.12 has been reinstated and clarified</p>

	parsons wv 26287	change the wording on a policy and then instantly stop a child from attending preschool. especially when the child has not attended preschool at all. What ever happend to what's best for the child?		
06-11	<p>Chuck Loudin Executive Director cdc@wwvc.edu Child Development Center of Central WV, Inc. 20 Camden Ave. Buckhannon WV 26201</p>	<p>Eligible Child... the last sentence does not seem to leave enough room for a child who is immature to remain more than one year. If this terminology does not allow for intangible reasons to allow a child to remain the second year, I am opposed to the addition of "based on curricular assessment."</p>	A-	Language in 3.12 has been reinstated and clarified
06-11	<p>Lindsay Monday teacher lmonday@kcs.kana.k12.wv.us Anne Bailey Elem 405 Winfield Rd St. Albans WV 25177</p>	<p>We feel that quality time is better than quantity time. When working with young children they seem to get more tired by the end of the week. When having a longer day and week the children will become irritable and less enthusiastic about learning. When the children get tired and unhappy the parents are more likely to keep them home, therefore hurting our attendance and the learning process. We are also concern about getting all the home visits and conferences completed on our families. There is also a concern about the amount of time needed to do all that is involved in Creative Curriculum assessments and inputting of cdocumentation into the computer. We are also concerned about planning, preparing lessons for our children and cleaning our room and toys for safety and health reasons.</p>	A-	Addressed in changes to 3.18
06-11	<p>Jackilyn Seneviratne Teacher jackilynsen@verizon.net Braxton County</p>	<p>Policy 2525, Section 3.10 addresses what is referred to as a substantial portion of the day. I work in public preschool and we appear to have 450 minutes of the day that our children are in attendance which is misleading. If we calculate the</p>	NA	This is not a policy issue but an issue related to the ECERS-R

Preschool/Head Start
525 Scarlet Ohara Dr
Summersville WV 26651

substantial portion of the day according that the FULL day we come up with more minutes that we have available for the children to be actively engaged in hands-on, interactive activities for learning. Therefore, we will always score at a 4 or below on the ECERS in areas that pertain to having materials available for a substantial portion of the day. In a day care, which the ECERS also covers, they are open earlier than 8am and usually have children until 5pm. Our minutes have to include, recesses or gross motor activities, breakfast, lunch, circle time which includes emerging literacy, small group time, planning, worktime and recall. ECERS requires 60 minutes of gross motor activities which really cuts into our day. Rest time should be 1 hour and 15 to 1 hour and 30 minutes. Breakfast takes 30 minutes and Lunch takes 45 minutes. Not to mention the time is takes to wash hands as many times as the ECERS requires and the toothbrushing that is mandatory and the time to move from one activity to another. Therefore, it is impossible to have the materials that ECERS requires available for 2 hours and 30 minutes of each day. There are too many requirements on our time between the High Scope Curriculum, the Emerging Literacy Program, and the ECERS to have enough time left to fulfill those time constraints. The substantial portion of the day should be figured on the actual time we have left after taking out the minutes required for gross motor, breakfast, lunch and rest time, at the very least. Our day is actually from 8:10-3:10 with time take out for the aforementioned activities. The minutes need to be refigured to meet our school day and the minutes that are already spoken for by other required activities. Please make

evaluation tool

		allowances so we can succeed rather than fail in our attempts to do what everyone expects of us.	
§126-(28)-(4) Parent/Guardian Involvement and Family Support			
05-22	Katie Berry Program Coordinator kberry@access.k12.wv.us Monongalia County Starting Points 668 River Rd. Morgantown WV 26505	None	No
05-24	Marlene Midget Executive Director mmidget@npheadstart.org 51 16th Street Fourth Floor Wheeling WV 26003	Agree	N +
06-01	Nicholas County Early Childhood Collaborative nrDavis@access.k12.wv.us 400 Old Main Drive Summersville WV 26679	4.1.1 needs stronger language to encourage home visits.	A- Addressed in 3.18
06-04	Sara Winfrey teacher swinfrey@access.k12.wv.us Wyoming County Schools PO Box 97 Mullens WV 25882	Parents should always have a choice regarding which agency provides their child's education at this critical stage of development.	A- Addressed in 3.12
06-08	Irene Rhodes Owner/Director	I think it's too much to ask middle class parents to provide transportation. Most of them are 2-paycheck families and	NA - Transportation will remain as a

<p>missirene@breezelink.net Miss Irene's PO Box 947 Martinsburg WV 25402</p>	<p>most of them can not take off after 3 hours to transport their child someplace. I think the Boards should offer transportation so ALL of the children who want to be in the program can.</p>	<p>supportive but not mandated service</p>
<p>§126-(28)-(5) Attendance</p>		
<p>05-15</p>	<p>Beverley A. Kane Teacher's aide bhilkane@yahoo.com 9240 Winchester Ave. Bunker Hill W. Va. 25413</p>	<p>As a teacher's aide at Pikeside Special needs Pre-K, I have some concerns about the extended hours at the school. The children go 4 days, with AM and PM classes. It seems like this enough hours for them. Some are tired when they come and tired when they leave. Mondays are the teachers' and aides' planning day. We have no laminator and the children's projects are planned and sometimes need lamination, which has to be done in Martinsburg. It's an extra trip to town, but with a day to do it, it really helps. I understand Jefferson County has one class on Mondays and one class on Fridays, giving the teachers and aides a half-day each day to do planning. With all the IEP meetings and Creative Curriculum requirements that the teachers have to enter in the computer, it doesn't seem fair to take away their time at school and add extra hours to do</p>
<p>One of many comments from the Eastern Panhandle. Half day programs plus a strong parent components support high quality and are acceptable</p>	<p>A-</p>	

		<p>their forms on each child.</p> <p>Each of us have our own family to consider, and want to be with in the evenings.</p> <p>Could you please find a way to have planning time without putting extended workhours on our workdays?</p> <p>Thank you.</p> <p>Sincerely, Beverley A. Kane</p>		
05-22	<p>Katie Berry Program Coordinator kberry@access.k12.wv.us Monongalia County Starting Points 668 River Rd. Morgantown WV 26505</p>	None	No	
05-24	<p>Marlene Midget Executive Director mmidget@npheadstart.org 51 16th Street Fourth Floor Wheeling WV 26003</p>	Agree	N +	
06-01	<p>LuAnn Radcliff administrator brookemulti@verizon.net Brooke County Pre School at Grandma's House Child Care Center</p>	<p>I feel that there should be some "help" to the County teams when deciding the best hours to offer pre school classes. For the past three years that we have been involved in this program we have had a AM class 9:00 - 11:30 and PM class 12:00 - 2:30 five days a week. This does not allow extra time for the family involvement that I feel should be</p>	No	

<p>701 Virginia Avenue Follansbee WV 26037</p>	<p>happening. We do not have enough time now to do home visits or meet with teachers from other WV pre schools to collaborate. Now the hours are increasing from 12 to 16 hours per week. How will two classes be able to be done back to back without further limiting parent contact daily. If more hours per day it will interfere with the bus schedule of departure and arrival of school children. I would request one day per week for teacher collaboration, parent visits and record keeping. Four days of four hours would be pre school.</p>		
<p>06-08 Irene Rhodes Owner/Director missirene@breezalink.net Miss Irene's PO Box 947 Martinsburg WV 25402</p>	<p>In the field of childcare, we scrutinize our staff ratios daily. . . somebody is out sick, somebody's car broke down...it's an ongoing issue. We swap staff from one age group to another. In this program the parents are expecting this to run like school, where most every day is the same teacher and same aide in that particular classroom. Our parents were very critical. Gimme' a break!! Plus, one day we could not provide a sub. at 8am (last minute illness) and the Pre-K program folded for the day. Geez.....in the childcare field we 1) adapt, 2) adjust and 3) overcome. If we closed our doors everytime we didn't specifically meet ratios in one of classrooms for 3-hours, we would be closed everyday.</p>	<p>NA -</p>	<p>Ratios must be maintained</p>
<p>06-10 Larry g Vogler teacher lgvogler@access.k12.wv.us Burke St martinsburg WV 25401</p>	<p>The preschool staff needs a least one day per week for set up of the learning environment. The need for constant supervision of young children prohibits the time to set up while supervising. I had a child run into the street of the downtown area while I was helping another child and the child could have been killed. I have had a toddler die in my own swimming pool and I felt responsible for a period of six years I questioned my competence to supervise children. It</p>	<p>N o</p>	

		is very important to put the safety of the children first.	
§126-(28)-(5) Financing			
05-22	Katie Berry Program Coordinator kberry@access.k12.wv.us Monongalia County Starting Points 668 River Rd. Morgantown WV 26505	None	NA
05-23	Karen Underwood krsunderwood@hotmail.com PO Box 324 Hilltop WV 25855	Head Start programs provide breakfast and lunch at no cost. The public school's preschool program charges for breakfast and lunch. If meals are provided free in one place, then they should be provided in all places.	This is a child nutrition and funding issue
05-24	Marlene Midget Executive Director mmidget@npheadstart.org 51 16th Street Fourth Floor Wheeling WV 26003	15.5.2 Why does 2525 say that a reduction in child care tuition during pre-k hours, if pre-k is supposed to be at no cost to the parent?	Pre-k is at no cost. Child care directors set their own tuition and fees
06-07	Martha Davis Pre-k-K Mentor missmarty1@verizon.net Nicholas Co. BOE Nicholas County BOE 400 Old Main Dr. Summersville WV 26651	15.5.2 Until there is a change in the reimbursement rate for meals in collaborative day care centers many will operate at a deficit.	This is a child nutrition federal legislation issue
06-08	Helen Post - Brown President SunbeamCCC@aol.com	Many quality collaborations are taking place all over the state. But, there are many that are not getting adequate funding to support their program. All child care centers	How programs are compensated is a local contractual

	<p>WVAYC 1654 Mary Lou Retton Drive Fairmont WV 26554</p>	<p>should receive adequate funding to support their centers. <ul style="list-style-type: none"> • 2525 states Pre-K childcare programs cannot charge for Pre-K hours, therefore there needs to be a system in place that would reimburse for all Pr-K hours or allow childcare centers to charge for service. </p>	<p>issue</p>
06-08	<p>Helen Post-Brown Owner/Director HBrown1998@a01.com Sunbeam Child Care Center LLC 1654 Mary Lou Retton Drive Fairmont WV 26554</p>	<p>• Many quality collaborations are taking place all over the state. But, there are many that are not getting adequate funding to support their program. All child care centers should receive adequate funding to support their centers. <ul style="list-style-type: none"> • 2525 states Pre-K childcare programs cannot charge for Pre-K hours, therefore there needs to be a system in place that would reimburse for all Pr-K hours or allow childcare centers to charge for service. </p>	<p>NA o How programs are compensated is a local contractual issue</p>
06-08	<p>Susan Miller President smillers@marshall.edu WVCCU 520 22 Street Huntington WV 25703</p>	<p>• Many quality collaborations are taking place all over the state. But, there are many that are not getting adequate funding to support their program. All child care centers should receive adequate funding to support their centers. <ul style="list-style-type: none"> • 2525 states Pre-K childcare programs cannot charge for Pre-K hours, therefore there needs to be a system in place that would reimburse for all Pr-K hours or allow childcare centers to charge for service. </p>	<p>NA o How programs are compensated is a local contractual issue</p>
06-08	<p>Michele Forsythe Director hfccoffice@wirefire.com Holy Family Child Care & Dev. Ctr. 161 Edgington Lane</p>	<p>There must be a system in place that will reimburse for all preK hours or allow child care centers to charge for the service. It is not fiscally responsible for child care centers to offer care and education free of charge.</p>	<p>NA o How programs are compensated is a local contractual issue</p>

	Wheeling WV 26003			
06-08	Irene Rhodes Owner/Director missirene@breezalink.net Miss Irene's PO Box 947 Martinsburg WV 25402	See my first comments please.....this is critical and the ONLY reason I stopped having this program in my center. If I hadn't lost money EVERY YEAR, I would have gladly done it again.	No	
06-09	Lisa Ray Coordinator LMRay@access.k12.wv.us Harrison County Schools 408 EB Saunders Way Clarksburg WV 26302	Our child care partners believe asking them to reduce their rates will put a burden on them financially and they say they may pull out of the collaborative.	No	
06-09	Helen Brown Director HBrown1998@aol.com Sunbeam Child Care Center 1654 Mary Lou Retton Drive Fairmont WV 26554	• 2525 states Pre-K childcare programs cannot charge for Pre-K hours, therefore there needs to be a system in place that would reimburse for all Pr-K hours or allow childcare centers to charge for service.	No	
06-10	PATTY F CUSTER PATTY W2ZS@AOL.COM BERKELEY COUNTY SCHOOLS 351 ALLENSVILLE ROAD HEDGESVILLE WV 25427	WE NEED TO DO A BETTER JOB OF SCREENING WHERE A CHILD ACTUALLY LIVES THERE ARE MANY STUDENTS (PRE K THRU 12) ATTENDING BERKELEY COUNTY WHO DO NOT LIVE HERE SO WE DO NOT GET THE TAX FUNDING WE WOULD RECEIVE BUT ARE STILL GIVING THESE STUDENTS A QUALITY EDUCATION AT OUR FINANCIAL LOSS	No	
06-11	Karen Cochran Owner kinderhaus@verizon.net	I support eliminating the 16.2 requirement. Programs and parents can work out those details among themselves.	No +	

	<p>Kinder Haus Child Care Center 129 Greenbag Road Morgantown wv 26501</p>			
06-11	<p>Karen Brunicardi Director Of Elementary Schools kbrunica@access.12.wv.us Wood County Schools 1210 13th Street Parkersburg WV 26101</p>	<p>15.5 No cost to parents for field trips will limit what community partners can do.</p>	NA -	<p>Multiple funding sources including funds from collaborative partners can help support field trips</p>
06-11	<p>Christine Mayman Executive Director cheersd@verizon.net CHEERS School Family, Inc. PO Box 344 KEarneysville WV 25430</p>	<p>Many quality collaborations are taking place all over the state. But, there are many that are not getting adequate funding to support their program. All child care centers should receive adequate funding to support their centers. The LEA shall provide funding for the community program to hire the pre-K teacher if the community programs prefer this model to the model of having a teacher placed by the LEA. 2525 states Pre-K childcare programs cannot charge for Pre-K hours, therefore there needs to be a system in place that would reimburse for all Pr-K hours or allow childcare centers to charge for service.</p>	N o	<p>How programs are compensated is a local contractual issue</p>
§126-(28)-(6) Collaboration and the County Plan				
05-22	<p>Katie Berry Program Coordinator kberry@access.k12.wv.us Monongalia County Starting Points</p>	None		

	668 River Rd. Morgantown WV 26505			
05-24	Marlene Midget Executive Director mmidget@npheadstart.org 51 16th Street Fourth Floor Wheeling WV 26003	6.3.1 and 6.3.4 - these statements contradict each other 6.4 State must enforce guidelines and policies of 2525 not leave it up to the local team to enforce or question. 6.7 Can the percentage or ratio of money returned to community partners be designated by 2525-ex. 10%. 6.9-Agree that classroom teachers be part of team. Who pays for sub?	N -	
05-30	Carla Fluharty Pre-K/Preschool Special Needs Teacher cfluhart@access.k12.wv.us Wetzel County Schools RR1, Box 108 A Metz WV 26585	Are the community partners going to be willing to give up some of their control. We have had problems in the past with confidentiality issues with our local Head Start. They are unwilling to share information.	N -	
06-01	Nicholas County Early Childhood Collaborative mrdavis@access.k12.wv.us 400 Old Main Drive Summersville WV 26679	6.13 Since Day care runs the risk of having their contracts not approved by the BOE and because applications have been taken and classrooms planned, the date should be earlier than July 15, rather than later. 6.14 Universal application presents some issues: Head Start needs income information on the application; BOE's are not allowed to "require" income information. Head Start is reluctant to allow language that makes income information an optional part of the application.	NA - NA -	The date was decided on by a collaborative policy revision team. Head Start has to know income to trigger funding.
06-08	Helen Post - Brown President SunbeamCCC@aol.com WVAYC	• 2525 states that by 2013 we will only be able to hire Pre-K teachers with certification. We do not support this change due to the fact that there is a predicted shortage of certified Pre-K teachers; therefore we need to continue hiring	A -	Eliminated from the revision

	<p>1654 Mary Lou Retton Drive Fairmont WV 26554</p>	<p>teachers who are approved to be on permit until there is no longer a shortage.</p>	
<p>06-08</p>	<p>jennifer trippett director cubbys449@msn.com cubbys child care center 801 Genesis Blvd. bridgeport wv 26330</p>	<p>Changing the wordage and saying that Child Care centers should give a discounted rate is not fair. These kids would be in my program regardless of whether we were doing PRE K or not. I much preferred the way it was originally stated. That Pre K was an enhancement to our program. That is a much more accurate statement of what is actually happening!!</p>	<p>No</p>
<p>06-08</p>	<p>Kay Tilton Director, Early Care and Education ktilton@wvdhhr.org WVDHHR/Early Care and Education 350 Capitol Street Room, B18 Charleston WV 25301</p>	<p>6.2 & 6.4 These sections do not correctly portray the process. The committee makes recommendations to the Secretary and the list approved by the Secretary is provided to WVBE. The committee does not actually provide a different list of recommendations to WVBE. This policy does not address what happens if the members of the review committee do not agree, or the State Department of Education disagrees with WVDHHR. Hopefully, the agencies will work it out it advance, so it may not be necessary.</p> <p>6.3 The additions including in this section should improve collaboration. However, in 6.3.2. add the following statement: "The LEA shall allow the community program to hire the pre-K teacher if the community program prefers this model of collaboration over the model of having a teacher placed by the LEA."</p> <p>6.7 It is extremely important to maintain the requirement for 50% of classrooms to be provided through contractual agreements with community partners.</p>	<p>No</p> <p>NA o</p> <p>N +</p> <p>A o</p>
			<p>Local communities had the decision making power about how collaboratives will be designed</p> <p>Changed</p>

		<p>6.10.1 Change Day Care to Child Care.</p> <p>6.10.2. The addition of this requirement will insure that all WV Pre-k community programs maintain compliance with the same health and safety requirements. This not only assures safe care for children, it levels the playing field for the participation of all community partners.</p>		
06-08	<p>Michele Forsythe Director hfccoffice@wirefire.com Holy Family Child Care & Dev. Ctr. 161 Edgington Lane Wheeling WV 26003</p>	<p>I support 50% collaboration of community partners and appreciate the committee's role in continuing this rule. Many collaborations are taking place all over the state. Many are not receiving adequate funding to support their programs. It is vital for all child care centers to receive funding to support their programs to make quality programs accessible to all of WV's children. Define collaborative classrooms as ones operated by community programs with financial support from the state through LEA. This will bring clarification to the term collaborative classroom.</p>	N +	
06-08	<p>Irene Rhodes Owner/Director missirene@breezelink.net Miss Irene's PO Box 947 Martinsburg WV 25402</p>	<p>My school board has been very good to me over the years and I have a wonderful working relationship with them. Yet, I still can not lose money to have this program in my building. If my centers loses money it comes directly out of my personal pocket. If the school board loses money they still get their paychecks - we don't. Head Start and RESA VII also get the same paycheck every week - we don't when we lose money in our buildings. Directors are even 'used' to forgoing a personal pay check to guarantee bills are paid and the building is in tip top shape. I've done it many times and so have the other Directors I've spoken to. This is not fair, and should not be expected of us. So dig a little deeper and</p>	N -	

		<p>collaborate alittle better, and we thank you. The first year I ran the PILOT Pre-K Program, I did not realize the procedure for submitting a bill for my stipend, and after I did realize the locals told me they could only pay me for 1/2 year. Ho Hum....I lost alot of \$\$\$ that year. This may sound like sour grapes, but it's more like poor grapes.</p>	
06-11	<p>Karen Cochran Owner kinderhaus@verizon.net Kinder Haus Child Care Center 129 Greenbag Road Morgantown wv 26501</p>	<p>I am pleased to see that the provision of no less than 50 percent of the classrooms must be provided through contractual agreements with community programs. I strongly support part-day community programs being required to be licensed in order to be eligible for a prek program.</p>	N +
06-11	<p>Melanie Clark Director, Quality Initiatives melanieclark@wvdhhr.org WV DHHR 350 Capitol Street, rm B-18 Charleston WV 25301</p>	<p>In 6.2 have the committee make recommendations to the Secretary of DHHR and a letter sent from DHHR to the county system if approved, and if not approved what needs to be revised.</p>	N o
06-11	<p>Karen Brunnicardi Director Of Elementary Schools kbrunica@access.12.wv.us Wood County Schools 1210 13th Street Parkersburg WV 26101</p>	<p>6.10.1 should state WVDHHR Child Care Center Licensing 6.3 early childhood team- is this the collaborative team? 6.3.1 Too many decisions being made by a team. Slows process down. 6.3.3 joint application and enrollment process - we will have around 40 classrooms when we reach 80% availability. It will be impossible to do joint enrollments, 6.4 Having changes signed by all core partners, too many people to keep getting signatures. Process is becoming more cumbersome! 6.6 Notifications of approval of changes is being held off till</p>	<p>Addressed in comments from Kay Tilton</p> <p>These are more statements about local concerns will policy implementation not statewide changes needed to the policy</p>

		<p>too close to beginning of school year. Need time for budgets to be created and approved.</p> <p>6.7 50% community programs - we're trying but it is tough!</p> <p>6.10 staff development related to all policies of partners- difficult to organize.</p> <p>6.14 Universal application and enrollment process- be careful for large counties. We can't get all together to enroll, but can use same form.</p>		
06-11	<p>Christine Mayman Executive Director cheersd@verizon.net CHEERS School Family, Inc. PO Box 344 KEarneysville WV 25430</p>	<p>I support 50% collaboration of community partners and appreciate the committee's role in continuing this rule.</p>	N +	
06-11	<p>Chuck Loudin Executive Director cdc@wwvc.edu Child Development Center of Central WV, Inc. 20 Camden Ave. Buckhannon WV 26201</p>	<p>Thanks for maintaining the 50% collaborations!</p>	N +	
§126-(28)-(7) Personnel Standards				
05-16	<p>Jeff Hoover Superintendent jthoover@access.k12.wv.us Tyler Cty BOE</p>	<p>7.2 - excellent! When will the posting at the Head Starts begin to upgrade their teachers credentials?</p>	N o	
05-18	<p>Bill Marcum</p>	<p>how many full time cooks and part time cooks are there per</p>	NA	This is addressed

<p>holstermaker@suddenlink.net rt 1 box 55a kermitt wv 25674</p>	<p>student? or in other words for every 75 or 100 students there should be (1)cook, is it up to each county to decide ? or is there a state law stating for every so many students there will be X number of cooks, who decides and what is it? thank you</p>	<p>in another policy</p>
<p>05-22 Katie Berry Program Coordinator kberry@access.k12.wv.us Monongalia County Starting Points 668 River Rd. Morgantown WV 26505</p>	<p>See 16 (Program Evaluation for Quality Improvement) comments.</p>	<p>No</p>
<p>05-24 Marlene Midget Executive Director mmidget@npheadstart.org 51 16th Street Fourth Floor Wheeling WV 26003</p>	<p>Agree</p>	<p>No +</p>
<p>05-29 Cathy Stout Preschool Coordinator cestout@access.k12.wv.us Jackson County Schools P.O. Box 770 Ripley WV 25271</p>	<p>Regarding 7.4.2 - Specialized Training - How many hours are required?</p>	<p>No</p>
<p>05-30 Helen Davies Head Start/Pre-k Coordinator hdavies@access.k12.wv.us Monongalia County Head Start 1433 Dorsey Avenue</p>	<p>Add a statement such as: Teachers holding a Preschool Special Needs certification will also be able to count the time they spend delivering the curriculum as individualized for each child with an IEP as also delivering the IEP objectives when the two are the same.</p>	<p>No Although this is happening throughout the state, problems in this county are the motivation for this</p>

Morgantown WV 26501	<p>7.7 This is an unfunded mandate and will devastate child care centers, eliminating them from the collaborative process. A child care provider who has extensive hands on experience, has completed ACDS, and has specialized training in Early Childhood could potentially be as "qualified" as a bachelor-level teacher. There will be no more money in 2013-14 than there is now. Even if someone has "permanent" authorization, due to inevitable turnover, a potentially good child care program would be knocked out of the collaborative process. Even if by some miracle there would be funding available for higher salaries, child care will never be able to match the benefits of BOE employees. Even partners such as Head Start will not be able to match BOE salaries.</p>	request
06-01	<p>Nicholas County Early Learning Collaborative mrdavis@access.k12.wv.us 400 Old Main Drive Summersville WV 26651</p>	A - Language eliminated
06-03	<p>Kathy Chapman pre-kindergarten teacher kechapma@access.k12.wv.us Berkeley County Schools 630 Winchester Ave. Martinsburg WV 25401</p>	NA - Research does not support this statement
06-07	<p>Martha Davis Pre-K-K Mentor missmarty1@verizon.net Nicholas Co. BOE</p>	A- 7.7 has been eliminated

	<p>Nicholas County BOE 400 Old Main Dr. Summersville WV 26651</p>	<p>degree people are often hard to find. If there proves to be a glut in the teacher market the community program may be able to snare such a person for 1 maybe even two years, but they will leave that work situation ASAP for a job in the public school system due to increased salary and benefits. Where does that leave them? On the other hand there are people who are interested in no further education than the associate degree and are wonderful teachers. In a rural area such as ours working full time and taking classes can be nigh unto impossible. Glenville is less than 2 hours away but after working 8 hours with children 3.5-4 hours of driving is a large barrier and that works ONLY if the college is offering a needed class in the evening! Perhaps we need some articulation agreements with higher ed if this provision is to stick,</p>	
06-07	<p>Mary Jo Graham Professor graham@marshall.edu Marshall University School of Educationq 1 John Marshall Drive Huntington WV 25755</p>	<p>Research is tending to support the benefits of 4 year degrees on quality of classrooms. By allowing an associates degree for community programs, does this mean that children from low income homes or homes with working families will have lesser quality programs? It seems like this has the potential to set up a two tiered system. Shouldn't all children have highly qualified teachers? Also, if an RBA is going to be acceptable, a clear definition of what courses are required in the emphasis in early childhood would be important.</p>	<p>Two recent studies by Drs. Sharon Lynn Kagan and Robert Pianta have question this statement</p>
06-08	<p>jennifer trippett director cubbys449@msn.com cubbys child care center 801 Genesis Blvd. bridgeport wv 26330</p>	<p>NA -</p> <p>A -</p> <p>changing the requirements for collaborative settings to hire their own staff would make collaborating very difficult!! Please reconsider</p>	<p>The language is clarified</p>

06-08	<p>Kay Tilton Director, Early Care and Education ktilton@wvdhr.org WVDHHR/Early Care and Education 350 Capitol Street Room, B18 Charleston WV 25301</p>	<p>7.4., 7.5 & 7.6. The permanent and temporary authorizations for teachers in community programs offer an excellent compromise for obtaining very qualified teachers in community programs without requiring BA degrees. It should remain in policy until such time as adequate supports are in place to produce the number of BAs needed in early childhood and to pay the community programs enough to retain them.</p> <p>7.7 The requirement of a BA degree for new staff hired after 2012 in community programs is burdensome for child care centers unless adequate funding is provided for them to pay salaries and provide benefits comparable to those of public school teachers. Recent research and current thinking also questions the necessity of a BA if other criteria are met, such as an AA with specific early childhood professional development.</p>	<p>N + A -</p> <p>7.7 has been eliminated</p>
06-08	<p>Michele Forsythe Director hfccoffice@wirefire.com Holy Family Child Care & Dev. Ctr. 161 Edgington Lane Wheeling WV 26003</p>	<p>The LEA shall provide funding for the community program to hire the pre-K teacher if the community program prefers this model to the model of having a teacher placed by the LEA.</p> <p>I do not support the change of hiring only PreK teachers with certification (by 2013) due to the predicted shortage of certified PreK teachers. We need to continue to hire teachers who are approved to be on permit until there is no shortage.</p>	<p>A-</p> <p>7.7 has been eliminated</p>
06-10	<p>Sharon Phillips srphilli@access.k12.wv.us 235 Manor Drive</p>	<p>I think all teachers, no matter the setting, should be required to be a certified teacher in early childhood.</p>	<p>No</p>

06-11	<p>Martinsburg WV 25403</p> <p>Karen Cochran Owner kinderhaus@verizon.net Kinder Haus Child Care Center 129 Greenbag Road Morgantown wv 26501</p>	<p>I think it would be helpful if the policy allows for the permit process to continue after 2013 for new hires in community programs with a relevant BA degree. PreK certifications are difficult to find and full-time employees are having difficulties getting the college credits needed in the evenings. More time is needed!</p>	A-	7.7 has been eliminated
06-11	<p>Melanie Clark Director, Quality Initiatives melanieclark@wvdhhr.org WV DHHR 350 Capitol Street, rm B-18 Charleston WV 25301</p>	<p>7.3 needs to be re-worded. Some counties believe that they can not let a teacher hired by the community partner be on permit, if there is anyone interested with the correct qualifications.</p> <p>7.7 can be really hurt community partners. This places a higher standard on community partners than on the school system. There is a shortage of qualified teachers this will only enhance that problem.</p>	A-	<p>Clarifying language has been added</p> <p>7.7. has been eliminated</p>
06-11	<p>Christine Mayman Executive Director cheers@verizon.net CHEERS School Family, Inc. PO Box 344 KEarneysville WV 25430</p>	<p>2525 states that by 2013 we will only be able to hire Pre-K teachers with certification. We do not support this change due to the fact that there is a predicted shortage of certified Pre-K teachers; therefore we need to continue hiring teachers who are approved to be on permit until there is no longer a shortage.</p>	A-	7.7. has been eliminated
06-11	<p>Chuck Loudin Executive Director cdc@wvwc.edu Child Development Center of Central WV, Inc. 20 Camden Ave.</p>	<p>There is a shortage of qualified pre-k teachers. Until that shortage no longer exists, we should be allowed to use permissible teachers.</p>	A-	7.7. has been eliminated

Buckhannon WV 26201	<p>7.7 Requiring new hires for community programs to hold a BA in early childhood, child development, or Preschool Special Ed or RBA with emphasis in early childhood or child development by 2013-2014 will effectively knock out most child care centers from participation due to the following reasons:</p> <ol style="list-style-type: none"> 1. There will be no more money in 2013 than there is now to pay a BA teacher. School systems are already saying they have squeezed financial conditions, chances are funding will get tighter, not better in the future. 2. Even IF the school system would pay for a BA teacher in a childcare setting, it usually works BEST for the childcare center to hire their own teacher, so the teacher is responsible to the childcare director. Otherwise the teacher is in a 'no-man's land', not directly responsible to anyone - and that does not make for a good program, no matter what the degree. 2. Teachers with the stated qualifications are especially hard to find in more rural areas. 3. If by some reason there is money to pay a BA person, there is no way that childcare can compete with the benefits of the school systems. <p>Regarding quality:</p> <ol style="list-style-type: none"> 1. Childcare has been in the business of providing early childhood education for many years. Many centers are nationally accredited and provide excellent programs that are possibly even more developmentally appropriate for young children than a classroom teacher or classroom that 			06-11	<p>Judy Olson Director friendsrfun@verizon.net Friends-R-Fun Child Dev. Center 70 Friends-R-Fun Drive Summersville WV 26651</p> <p style="text-align: right;">7.7. has been eliminated</p>
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	<p>has been used for older children and has geared down to the preschool level.</p> <p>2. Childcare can usually provide excellent teaching for much less than the public schools can, and can therefore make a valuable contribution to making 'universal pre-K' possible.</p> <p>3. Childcare teachers that have worked in the field and have gained their specialized education in early childhood through the ACDS courses plus further training, provide excellent teaching for the children, are usually very dedicated to be in and stay in the field in spite of the lower pay, and can provide education that equals or excels classrooms with a BA teacher. (The study that is quoted that ties better education with a higher degree for the teacher possibly did NOT compare specialized training in early childhood.</p> <p>At the very time when the State is required to reach 'universal pre-K', to knock out most of the childcare partners, would make 'universal Pre-K' a goal that probably would not be reached, as the public schools may not be able to afford or have the classroom space to take up the slack. If most of the 4 year olds go into the school system, it will create a burden on families that need child care before or after school. It may also effectively cause the closing of child care centers due to funding problems, if they lose their 4 year olds. That would impact the workforce in WV if parents do not have reliable child care.</p>	
06-11	Judy Olson	7.5 - 7.6 It is a great idea to have 'temporary' and

	<p>permanent' authorization status available for community partners. I just hope that does not have to end in 2013.</p>	<p>friendsfun@verizon.net Friends-R-Fun Child Dev. Center 70 Friends-R-Fun Drive Summersville WV 26651</p>	
<p>§126-(28)-(8) Health and Safety Requirements</p>			
	<p>8.2 - teacher caseloads shall not exceed 30. Is that 30 per day with the help of 2 aides?</p>		<p>No</p>
	<p>8.3 - excellent!</p>		<p>No</p>
	<p>8.12 - let's make sure Head Start's philosophy of "anything goes" does not make their employees fearful of correcting students at the most basic level.</p>	<p>Jeff Hoover Superintendent jthoover@access.k12.wv.us Tyler Cty BOE</p>	<p>No</p>
<p>05-16</p>	<p>8.21 - "...when a child desires or exhibits the need to rest..." This do your own thing attitude of sleep when you want, and do what you want, when you want is very PC, but not in the best interest of the big picture of child development. The verbage stricken from 10.4.7g makes a great deal more sense.</p>		<p>NA -</p>
	<p>CONCERNED WITH THE RECOMMENDED CHANGES FOR SECTION 8- I HAVE BEEN A SCHOOL NURSE FOR ABOUT 4 YEARS AND HAVE BEEN DOING THE VISION, DENTAL AND HEALTH SCREENINGS. I HAVE NOTICED ON SEVERAL HEALTH CHECK EXAMS THAT THE AREAS ON VISION, HEARING, LANGUAGE, SPEECH ETC ARE ADDRESSED AS PARENT REPORTS OR CHILD REFUSED. THIS IS ONE</p>	<p>KRISTI CROOK SCHOOL NURSE sammienuising@yahoo.com LEWIS COUNTY BOARD OF EDUCATION 239 COURT AVENUE WESTON WV 26452</p>	<p>NA -</p>

Teacher caseloads are total. These are not classroom caseloads

Young children need the opportunity to rest is needed

HealthCheck is supported by WVDE, WVDHHR and the Governor's office. The policy does not require HealthCheck

	<p>REASON THE SCREENINGS ARE GOOD FOR PREK AND K STUDENTS. ALSO NURSES USE THE SCREENINGS FOR TALKING WITH PARENTS REGARDING HEALTH ISSUES THEIR CHILD HAVE SO WE CAN BE MORE PREPARED TO MEET WITH THEM AT THE BEGINNING OF THE SCHOOL YEAR AND COMPLETE CARE PLANS WITH THE TEACHERS THAT WILL BE HAVING THEM IN THEIR CLASSROOM.</p>	
	<p>Response to Health Requirements, Policy 2525</p>	
<p>HealthCheck is supported by WVDE, WVDHHR and the Governor's office. The policy does not require HealthCheck</p>	<p>NA -</p> <p>The guidelines for hearing screening of the preschool population have been clearly defined by ASHA (1996) and the WV Hearing Screening Task Force (1999). A copy of these documents have been mailed to Kathy Knighton at the State Department of Special Education.</p> <p>ASHA and our WV Hearing Screening Task Force set these guidelines for a reason:</p> <p>Based on years of controlled research, these guidelines met the criteria for sensitivity and specificity required for the identification of potentially, educationally significant, hearing loss. ASHA developed specific guidelines for the preschool population b/c " the testing procedures used for this age group require more training, instruction and caution on the part of the examiner than do traditional procedures used on older children (ASHA, 1996)</p> <p>Hearing screenings must be performed by qualified</p>	<p>LuAnn B Hendershot, AuD, CCC-A Educational Audiology Coordinator lbhender@access.k12.wv.us RESA VII 1201 N 15th St Clarksburg WV 26310</p>
<p>05-17</p>		

individuals. The preschool population is very difficult to test. It requires time to train the children, complete the screening, and document all test results (Permanent health cards have a place for results, tests used and testers signature). If you miss identifying a child in their one and only screening, you could have a lifelong negative impact on communication, health or future academic performance. That is why ASHA recommends that this testing be performed by an audiologist or under the supervision of an audiologist.

Immittance testing to identify potential ME pathology in young children is an important part of the screening. I can understand that in a doctors office, otoscopy would suffice, but I have had many docs request immittance testing when they were not sure what they were seeing.

In a school-based preschool screening, no doctor is looking in the ears and immittance testing is an important part of the screening process B/C middle ear (ME) disease (and associated hearing loss) varies with the time of year. The Fourth Research Conference on Otitus Media recommends that screening take place in both the Spring and Fall during the preschool years (Lim, 1989). If the preschool child only has one hearing screening in their lifetime, we may be missing many educationally significant hearing losses. The data I kept from 1979 to 2001 showed that 37% of the preschool population in RESA VII had educationally significant hearing loss (more than 20dB) with or without ME pathology during their preschool years

ASHA and the WV Hearing Screening Task Force sets specific criteria for ruling out a hearing loss: the child must respond to puretone presentations at 20dB at 1000Hz, 2000Hz and 4000Hz for two out of three presentations. If immittance testing is not used then 500Hz @ 25dB must be added due to its sensitivity to ME pathology. It has been my experience in North Central WV that physicians' audiometers are set to a factory default level of 25dB (maybe b/c that is the screening level for adults). Few that I have spoken with even knew that that is not the recommended level for screening children. Much of the training that the staff receives in a physician's office is by the person who sold them the equipment. Otoacoustic emissions testing has been sold to some physicians to use as a hearing screening tool. Whereas it can be very beneficial in the birth to 2 year old population where we are trying to rule out hearing loss above 30dB, it does not meet the guidelines for screening children 36 months and older. So.....

Who is going to inform the doctors that the protocol stated in the Health Check document does not match the protocol prescribed by ASHA and the WV Hearing Screening Task Force?

Who is going to provide the training for the physician's staff performing the hearing screenings so that all children are receiving the same quality of service?

How are we going to know who failed and needs rescreened? Will someone at the school level review all health records and compile a list of who failed the screening and/or who did not have a screening?

How are we going to know what part of the screening the child had difficulty with? The physical forms I have seen in many years of testing Head Start children have a box that you check if hearing is OK (again based on what criteria). Most return unchecked (what does that mean?) or say CNT.

If the physicians refer any child that fails one hearing screening to an audiologist for evaluation, we are going to have many false positive referrals, therefore eroding confidence in the hearing screening procedure and causing undue anxiety for the parents of the children involved.

If children who cannot respond to the test in the docs office are allowed a second attempt in 4-6 months, the potential to lose that much learning time due to reduced hearing exists.

How many children do you think will get a hearing screening that could last 10 minutes or more for a 3 year old, during a 20 minute physical? Is this fair to the child or the physician?

I believe that we have had a hearing screening program in the State of WV that was among the best in the nation. We

have had it whittled away repeatedly in the last few years. What is the point of making changes to policy that do not improve the procedure?

Concerns about the document:

WEST VIRGINIA COUNCIL OF SCHOOL NURSES

RECOMMENDATION

For

HEARING SCREENINGS

Hearing screening is a compulsory pre-enrollment screening for all children entering public school for the first time in this state, according to West Virginia Code §18-5-17. This hearing screening should be performed by an audiologist, speech pathologist or his/her designee (other professional trained by the audiologist). The Regional Education Service Agencies (RESA) have coordinated service delivery through audiologists who have developed "Hearing Screening Guidelines".

A letter communicating the results of the screening and recommendations should be given to the parent or guardian as soon as possible. A method should be developed for tracking referrals and for encouraging follow-ups as needed. The West Virginia Education Information System (WVEIS) provides a method for recording and tracking hearing screening results.

It is the recommendation of the West Virginia Council of School Nurses that counties shall employ either an

audiologist, speech pathologist or hearing specialist (what or who is a hearing specialist? Hearing aid dealer in WV can call themselves a hearing specialist. A teacher of the hearing impaired may also use this term, but an audiologist generally does not.) to perform hearing screenings. All persons/school personnel who perform hearing screenings must be trained by a (hearing specialist, such as audiologist or speech pathologist (Speech pathologists should not be training anyone to perform preschool hearing screenings. They are not "hearing specialists" and may not meet the guidelines for persons who can even screen the preschool population without further training and/or supervision). A total of 98% of West Virginia children have medical insurance and should be receiving a comprehensive physical exam (i.e. HealthCheck) annually with a hearing screening. The health provider's hearing screening results shall be valid up to one year (recommendations for the preschool population suggest 2 screenings per year since preschoolers are high risk for hearing loss associated with middle ear pathology. This fluctuating hearing loss can have an adverse effect on language and learning.) and meet the requirements of hearing screening, as indicate in W. Va. Code §18-5-17 and West Virginia State Board of Education Policy. <http://www.wvdhhr.org/mcfh/ICAH/healthcheck/Default.htm>

No hearing screening process, consistent criteria for passing, or referral criteria are included in this document. Specific objective criteria as recommended by the American Speech, Language and Hearing Association and the WV Hearing Screening Task Force should be included in this document.

	<p>A copy of said documents have been provided to Kathy Knighton at the Department of Special Education.</p> <p>Sincerely, LuAnn B. Hendershot, AuD Educational Audiology Coordinator RESA VII 1201 N 15th Street Clarksburg, WV 26301 304-624-6554, ext 228 lbhender@access.k12.wv.us</p>	
05-18	<p>April Carpenter Parent keylimepie71@netzero.com Lakeside Elementary School Rt.3 box 119 Hurricane WV 25526</p> <p>I am parent of a child who will be attending Lakeside Elementary Pre-K in the fall and I am very upset that you are not wanting to let the Pre-K ride the bus. To the best of my knowledge there have not been any complaints or problems due the children who currently ride, nor do I think it is in any way fair you to provide transportation for a "Special needs Child" and no transportation for those without. I am sure that's called discrimination. I would have the same problem if you were telling me my child could not ride if they had " Special Needs" I had one child go through Pre-K at the same school and have known children every year thereafter to ride without difficulty. I don't see the logic in putting one child on the bus and follow the same bus to the school to drop off the other!!!!</p>	<p>No</p> <p>This issue was resolved</p>
05-22	<p>Katie Berry Program Coordinator kberry@access.k12.wv.us Monongalia County Starting</p> <p>I feel the classroom ratio is too high. One teacher/aide to every ten students is not enough, especially in an inclusive environment of most classrooms (in Monongalia County). Teachers are often faced with the situation of having to</p>	<p>NA -</p> <p>Staff: child ratios meet the recommendations of the National</p>

<p>Points 668 River Rd. Morgantown WV 26505</p>	<p>address the increased needs of the special needs student, resulting in a loss of instructional time for the remainder of the students. Alternately, the opposite may occur when the teacher feels unqualified, lacks motivation, or time to address the needs of the special needs student and the student gets lost in the rest of the class and misses out on his/her learning and development. I feel there is also a contradiction to the ratio when it is stated that all children must be supervised while using the restroom. Typically when children are using the restroom it is two to three at a time with an adult. This leaves the other adult in the classroom with a ratio that is far above the regulated amount. It would also be virtually impossible for the aide or teacher to take ten children to the restroom, and to supervise them while there. A policy suggestion would be to have a decreased ratio for each classroom and utilize part-time teachers or to require consistent itinerate staff for additional classroom coverage.</p>	<p>Association for the Education of Young Children; Head Start Performance Outcomes, and Child Care Licensing</p>
<p>Marlene Midget Executive Director mmidget@npheadstart.org 51 16th Street Fourth Floor Wheeling WV 26003</p>	<p>8.2 Disagree with 1:20 staff/child ratio during naptime. Explain teacher caseload ..shall not exceed 30 8.5 Add- at no cost to the parent/guardian. 8.1.4.3-Add-staff person who has been trained in Passive Restraint 8.27.2-Add- child must be in a child restraint(seat belt). 8.28.5 Clarify - video games 8.30-Add-a hazardous materials list should be on site at all times.</p>	<p>Staff:child ratios meet child care licensing National School Lunch allow charging parents for meals Passive restraint is a debatable, local</p>
<p>05-24</p>	<p>NA - NA- NA - N o</p>	

	training issue		
05-29	<p>8.2</p> <p>The reduction of a teacher caseload per day from 40 to 30 is a concern. This means that we will have to provide 25% more staffing to implement Pre-K programs. In addition to being a financial concern while we are purchasing furniture and curriculum materials to set up numerous new classrooms, locating 25% more highly qualified staff while competing with surrounding out-of-state districts will be challenging.</p> <p>8.7</p> <p>Currently EPSDT services are not offered through our county health department. It is unclear whether or not local physicians and the health department will be able to complete the vision, hearing, speech, dental, and developmental screenings as well as the physical examinations. Because of the growth of the community, health services are also in great demand.</p>	<p>NA -</p> <p>NA -</p>	<p>Caseloads for pre-k teachers at 40 are too high to allow teachers time for assessment, planning, home visits because teachers in pre-k consider all parts of the day as instructional time</p> <p>Local issue in the eastern panhandle</p>
05-30	<p>8.2</p> <p>I would like some clarification about caseloads. What are the specific number of children allowed in an integrated classroom. Are speech only IEP's included in that number.</p>	<p>NA -</p>	<p>Referred to Ginger Huffman, Preschool Special Needs Coordinator</p>
	<p>Kim Hough Assistant Director of Special Education klhough@access.k12.wv.us Berkeley County Schools 401 S. Queen St. Martinsburg WV 25401</p> <p>Carla Fluharty Pre-K/Preschool Special Needs Teacher cfluhart@access.k12.wv.us Wetzel County Schools RR1, Box 108 A Metz WV 26585</p>		

06-01	<p>Tammy Clarkson Preschool Teacher tclarkso@access.k12.wv.us HJK Elementary 803 Kaiser Avenue Ravenswood WV 26164</p>	<p>Why was the old section 8.7 regarding screening for impairments/delays removed? First of all, it is a means to let the community know that preschool services are available. Furthermore, all children enrolling into public schools must have a speech/language, hearing and vision screenings, and the countywide developmental screening clinic provides us with the opportunity to do this without interrupting instructional time. When developmental screening is done as well, it provides a general baseline for overall progress in addition to the first 12 week progress report. It also gives parents information about what their children are ready to learn next. It can be a parent education opportunity.</p>	
06-01	<p>Nicholas County Early Childhood Collaborative mrdavis@access.k12.wv.us 400 Old Main Drive Summersville WV 26679</p>	<p>3.16 We support language that HealthCheck be "recommended" rather than required. Some providers have developed an equivalent form to meet Head Start requirements.</p>	N +
06-01	<p>LuAnn Radcliffe administrator brookemulti@verizon.net Brooke County Pre School at Grandma's House Child Care Center 701 Virginia Avenue Follansbee WV 26037</p>	<p>Please make clear what and when requirements are to be done. We had registration in February. AFTER registration it was decided the physical needed to be immediate not in August at start of classes. Now in May I have been informed that dental is going to be required. I do not like not knowing information with new parents.</p>	N -
06-03	<p>Kathy Chapman pre-kindergarten teacher kechapma@access.k12.wv.us Berkeley County Schools</p>	<p>As I understand 8.2, it is proposed that the ratio is 1:10 and when children with no IEPs are present the room capacity may go as high as 3:30? I urge the committee to first reconsider the 1:10 ratio and make it 1:9 which is more in</p>	

<p>630 Winchester Ave. Martinsburg WV 25401</p>	<p>accordance with NAEYC standards. The idea of 30 young children in one room, (even if it does meet the 1,050 square footage minimum, is absolutely horrifying to me. I have worked in many phases of early education for the past 18 years: from family child care, family facility child care, advisor to county child care, ACDS instructor, Head Start Inclusion teacher, and now county school system teacher. I have earned my Masters in Early Childhood and I can tell you one thing for certain: the more children in a facility, the less real interaction occurs other than custodial care. While this is not what theory suggests, this is what occurs in reality. I urge the committee to reconsider the proposal to allow 30 children and to take it a step farther and to amend the ratio to 1:9</p>	
<p>James A. Chapman preschool special needs teacher jmchapma@access.k12.wv.us Myself PALC 3635 Winchester Ave. Martinsburg WV 25401</p>	<p>8.2 How can there be 30 preschool children in one room when in the K classroom they can only have 20? Is this a full day program or is it two half day programs? What is the real number one can have in a class at one time? Is it 30 for the two half day programs or 60 for the two half days?</p>	
<p>Lora Crowell School Nurse lcrowell@access.k12.wv.us Berkeley County Schools 457 Tanbridge Drive Martinsburg WV 25401</p>	<p>8.6 (p. 17) states - "Children that are not fully immunized, may be enrolled....but may not enter WV Pre-K classrooms until they have received the first series of shots." In other words, they can attend if shots are not current for their age. 126CSR5.2.1 (p.5) states - "All children entering pre-K, K, and WV school for first time must have immunizations and show proof." This clause does not mention that they can</p>	<p>Actually, kindergartners can be enrolled after their first series as per a superintendent's interpretation</p> <p>N-</p>

		<p>attend class if they have had the first series.</p> <p>This is confusing because we do not allow kindergartners entering school for the first time to attend class until ALL shots are age-appropriate and current. (DTP-3doses; Polio-3doses; MMR- 2 doses). However, we are going to allow Pre-K students to attend as long as they have had the first of their series of shots.</p>		
06-07	<p>Andrea Campbell Assistant Professor acampbell@concord.edu Concord University Marsh Hall 104-A Concord University Athens WV 24712</p>	<p>A caseload of 30 children is scary!!!</p>	N -	
06-07	<p>Martha Davis Pre-k-K Mentor missmary1@verizon.net Nicholas Co. BOE Nicholas County BOE 400 Old Main Dr. Summersville WV 26651</p>	<p>8.7 This appears to not be finished, as there is a colon at the bottom with no list of special required instructions.</p> <p>8.1.8 In some public schools we must share with other classes and grades; not always possible to go into the bathroom with the boys; teachers always stand outside the door; I assume this would be classified as "supervision."</p> <p>8.22 Outdoor activity. Is it possible for some language to be added about going outdoors for a reasonable amount of time in colder weather if the children are adequately clothed? I took the children who wanted to and had boots, snowpants, mittens, etc. out to play in the snow. For some of them this was their only opportunity to get out and have this experience. We even kept a closet of used/donated boots, snowpants, etc. for those children who did not have</p>	N o	This is a local programming issue
			NA -	

			adequate outdoor clothing.			
06-08	Helen Post - Brown President SunbeamCCC@aol.com WVAYC 1654 Mary Lou Retton Drive Fairmont WV 26554		Playgrounds in many Board of Education sites are not safe for Pre-K children. They should follow the same safety regulations for playgrounds that child care centers do. ALL children should be safe in all settings!!	A -		The policy does require the same of all settings. Monitoring and enforcement are the issues here
06-08	Helen Post-Brown Owner/Director HBrown1998@aol.com Sunbeam Child Care Center LLC 1654 Mary Lou Retton Drive Fairmont WV 26554		• Playgrounds in many Board of Education sites are not safe for Pre-K children. They should follow the same safety regulations for playgrounds that child care centers do. ALL children should be safe in all settings!! The playgrounds in Marion County at several sites are not fenced in, do not have adequate ground cover and are too large for pre-k children.	A -		The policy does require the same of all settings. Monitoring and enforcement are the issues here
06-08	Susan Miller President millers@marshall.edu WVCCU 520 22 Street Huntington WV 25703		• Playgrounds in many Board of Education sites are not safe for Pre-K children. They should follow the same safety regulations for playgrounds that child care centers do. ALL children should be safe in all settings!!	A -		The policy does require the same of all settings. Monitoring and enforcement are the issues here
06-08	Kay Tilton Director, Early Care and Education ktilton@wvdhhr.org WVDHHR/Early Care and Education 350 Capitol Street Room, B18		8.1 Change Day Care to Child Care.	A 0		Changed

06-08	<p>Charleston WV 25301</p> <p>Irene Rhodes Owner/Director missirene@breezalink.net Miss Irene's PO Box 947 Martinsburg WV 25402</p>	<p>This program still has to meet WV Regulations for childcare centers. One BIG challenge for centers is to have the 11" of playground mulch for our centers. Why couldn't the Board provide that? Then that mulch would meet THEIR standards as well as ours.</p>	N -	
06-09	<p>Lisa Ray Coordinator LMRay@access.k12.wv.us Harrison County Schools 408 EB Saunders Way Clarksburg WV 26302</p>	<p>Health check form requirement is good. My concern is that a nurse is not an expert in speech and language, so they should still have that screening on the school level.</p>	A -	<p>This concern has been expressed by many respondents</p>
06-09	<p>Linda Ms. bandvs@gmail.com Bunce PO Box 608 Cool Ridge WV 25825</p>	<p>An ongoing issue for PSN teachers is the necessity of leaving the classroom under the supervision of one adult only during IEP meetings. Up till now, it was possible to schedule most of these meetings on Fridays. Now that we have gone to 5 instructional days per week, at least one teacher will have to leave the classroom during these meetings. Generally other school staff familiar with the children are also involved in IEP meetings (such as speech therapists.) This is such a potentially a dangerous situation, given the age and behavioral/health issues of our students. We need protection, as in mandating that IEPs be held on instructional days, (even if preschool must have more noninstructional days than the rest of the school). There are circumstances that make preschool different, especially the inclusive classrooms. Many of the health and safety requirements are ignored by</p>	A-	<p>The hours issue has been addressed</p>

		the school system, or just not possible: easy access to adequate toileting facilities, appropriate amount of space, safe and appropriate playgrounds--my own school will not be able to comply with any of these requirements, especially as the number of preschoolers served increases.		
06-09	Helen Brown Director HBrown1998@aol.com Sunbeam Child Care Center 1654 Mary Lou Retton Drive Fairmont WV 26554	<ul style="list-style-type: none"> Playgrounds in many Board of Education sites are not safe for Pre-K children. They should follow the same safety regulations for playgrounds that child care centers do. ALL children should be safe in all settings!! 	A-	The policy does require the same of all settings. Monitoring and enforcement are the issues here
06-10	PATTY F CUSTER PATTY WZS@AOL.COM BERKELEY COUNTY SCHOOLS 351 ALLENSVILLE ROAD HEDGESVILLE WV 25427	OUR SPECIAL NEEDS CHILDREN ARE ALWAYS PUTTING TOYS AND BLOCKS IN THEIR MOUTHS WE DO NEED EXTRA TIME TO KEEP THEM CLEAN AND SANITIZES	N o	
06-10	Suzanne Viski Director of Special Services sviski@access.k12.wv.us Taylor County Schools P. O. Box 160 82 Utt Drive Grafton WV 26354	In 8.7 it states the Health Check form will be signed by the child's licensed health care provider. While I agree with having each child be screened for health by their health care provider, I do not believe the health care providers are appropriate for speech and language, or hearing screenings. Speech Language Pathologists and Audiologists should be providing these screenings. They are the most qualified to complete these screenings. I worry about Dr's who will over refer students for assessments in these areas as well as Dr's who will under refer in these areas believing "the kids will grow out of it". SLPS, and Audiologists are trained in the	A-	This is an issue of concern

		<p>development of these areas and should be doing the screenings. Public Schools will have additional costs for evaluations and additional screenings if this were to be implemented. The Healthcheck form only states a few board statements in these areas for the Dr to check and are not adequate (nor appropriate) for screenings in these areas.</p>	
06-10	<p>Sharon Phillips srphilli@access.k12.wv.us 235 Manor Drive Martinsburg WV 25403</p>	<p>I currently have two classes of 20 students. I think the reduction to a caseload of thirty students would be an improvement. It is difficult to give all the students the attention they deserve. There are 2 adults in the classroom. When we divide into two groups, we still have 10 children in a group. The children can not respond and participate as much as I would like. The documentation required for Creative Curriculum is very time consuming for 40 students. We have 50 objectives for 40 children. I spend hours on the computer. The problem for our county is providing classrooms for all the children. We are a growth county and have a lack of space. My classroom needs to be used for a morning and afternoon class in order to provide Pre-K for as many children as possible. The county also needs funding to pay for the extra teachers required when the caseload is lessened.</p>	N +
06-11	<p>Karen Cochran Owner kinderhaus@verizon.net Kinder Haus Child Care Center 129 Greenbag Road Morgantown wv 26501</p>	<p>I have visited several sites (including public schools) where the playgrounds are inappropriate and actually unsafe for prek students. I have visited sites where basic health requirements are not adhered to (ex. no handwashing prior to meals, adult/child ratios not being met while teacher leaves the room for planning, etc.), even in public school settings! ALL sites should be required to meet ALL health and safety</p>	A- N + The policy does require the same of all settings. Monitoring and enforcement are the issues here

	<p>requirements. There should be no exceptions and strict enforcement is needed!</p> <p>I support teacher caseloads of 30 when no children with IEP's are enrolled; however, I support speech IEP's being excluded from this caseload requirement.</p> <p>I support the 1/10 ratio.</p> <p>I don't know if this the appropriate space for the following comment, but I have a real concern that three-year-old children with IEPs are enrolled into the PreK classrooms. This allows a child who has just turned three to be in a classroom with children who may have turned five on September 2. This situation occurred in my collaborative classroom and I saw digression in the 3 YO's behavior and cognitive development. Despite this digression, my concerns were left unanswered by the BOE because 2025 "permitted" the situation to continue.</p> <p>I strongly support addition of "At no time should prek children be without adult supervision in the bathroom". Public school principals and teachers need to heed this reg. I have observed prek children being sent down long hallways to bathrooms alone in the public schools in Mon County. I love the language added requiring that prek children being transported by a school bus be with other prek children.</p>	N +	
<p>06-11</p> <p>Melanie Clark Director, Quality Initiatives melanieclark@wvdhhr.org WV DHHR</p>	A 0	Changed	
<p>8.1 should state WVDHHR Child Care Center Licensing</p> <p>8.18 What about with a bathroom in the classroom with a single toilet? The teacher will still need to go in their with</p>			

	<p>the child???</p> <p>8.21 there should be a requirement for the time that children should rest.</p>	<p>350 Capitol Street, rm B-18 Charleston WV 25301</p>	<p>Follows child care licensing</p>
06-11	<p>The proposed change from school-based hearing screenings, conducted by highly qualified speech-language pathologists and audiologists, who adhere to best practice guidelines recommended by their national organization in regard to OBJECTIVE measures of hearing sensitivity and middle ear function (a much more common problem in school-aged children that is not even addressed in the new legislation) on children from three to twenty-one years of age, to a medical model that accepts "subjective" input from the caregiver is a frightening step backwards in regard to child find. Please do NOT let the HealthCheck take us back THIRTY years! Hearing screening is so much more evolved than that!!</p>	<p>Mary Florence Educational Audiologist mflo7@hotmail.com Wood County Schools c/o RESA V 2507 Ninth Avenue Parkersburg WV 26101</p>	<p>A -</p> <p>This issue has been repeatedly expressed by the SLP/Audiologists.</p>
06-11	<p>8.7 Requirement for HealthCheck form within 45 days of enrollment based upon screenings completed within one year may present a hardship for families. Ex: a child who has had a well child visit prior to July will not be within forty-five days of enrollment but will not be covered under insurance for another well child visit until one year from the date of the last visit. Therefore, parents will incur additional out of pocket charges to have additional screening and/or paperwork documentation completed.</p> <p>Additionally, clarification is needed regarding the school system responsibility for pre-enrollment screening as delineated in § 18-5-17 (a) All children entering public school for the first time is this state shall be given prior to</p>	<p>Lisa Martin Director of Special Education ldmartin@access.k12.wv.us Jackson County Schools PO Box 770 Ripley WV 25271</p>	<p>NA -</p> <p>The language allows for other health form</p>

	<p>their enrollment screening tests to determine if they might have vision or hearing impairments or speech and language disabilities.” “The boards shall coordinate the provision of developmental screening with other public agencies...” It is unclear whether or not the required HealthCheck replaces the LEA obligation in state code. While it may be the intent of this policy for families and children to establish a medical home, it is possible that hearing, vision, speech/language and developmental screening currently provided by trained staff of the LEA and interagency providers will not be completed as comprehensively in a physician office. Clear direction is needed if the policy is to supersede state law.</p> <p>8.31 and 8.32 This new requirement is evidently to remove the potential for suffocation and no doubt references possible suffocation with plastic bags, balloons/pieces of balloons that could block the wind pipe, and/or styrofoam beads, peanuts, etc. Clarification is needed regarding whether this is to be interpreted stringently to include such things as zip lock bags and styrofoam cups that are often used when completing art activities with play dough, paint, etc.</p>	
06-11	<p>The proposed change from school-based speech-language screening conducted by highly qualified speech-language pathologists who adhere to best practice guidelines recommended by their national organization in regard to standardized instruments, norm-referenced on children from three to twenty-one years of age, to a medical model that proposes accepting "subjective" input from caregivers is a very troubling step backwards. While the overall intent of</p>	<p>Nancy McManus Head Speech-Language Pathologist nmcmamus@access.k12.wv.us Wood County Schools Wood County Schools, Sp. Ed. Office 1210 Thirteenth Street</p> <p style="text-align: right;">A -</p>

	Parkersburg WV	the legislation to facilitate an ongoing relationship with a primary medical professional prior to entering school is laudable, the "acceptable" speech-language screening is wholly inadequate. At this time, the school system provides for effective, efficient, well-documented and organized tracking of screenings via WVEIS. Please do NOT "fix" a system that is NOT broken!		
06-11	Karen Brunnicardi Director Of Elementary Schools kbrunica@access.12.wv.us Wood County Schools 1210 13th Street Parkersburg WV 26101	8.7 45 days allowance conflicts with the 30 days allowed in childcare to turn in physical form. 8.18 Too much regulation- can't always have an adult with a child in a bathroom.	NA -	Child safety is of the utmost importance
06-11	Christine Mayman Executive Director cheersd@verizon.net CHEERS School Family, Inc. PO Box 344 KEarneysville WV 25430	Playgrounds in many Board of Education sites are not safe for Pre-K children. They should follow the same safety regulations for playgrounds that child care centers do. ALL children should be safe in all settings!!	N -	All settings are required to meet the same standards. This is a monitoring and enforcement issue.
06-11	Chuck Loudin Executive Director cdc@wwvc.edu Child Development Center of Central WV, Inc. 20 Camden Ave. Buckhannon WV 26201	Public school playgrounds should be under the same scrutiny and requirements as our child care licensed playgrounds.	N -	All settings are required to meet the same standards. This is a monitoring and enforcement issue.
06-11	Judy Olson friendsrfun@verizon.net	8.7 The ability to have an "other comprehensive health screening comparable to the HealthCheck protocol" is very	N o	

Friends-R-Fun Child Dev. Center 70 Friends-R-Fun Drive Summersville WV 26651	important to have. HealthCheck is in vogue right now, but another tool may become available that is better or that a doctor may prefer to use. We do not want to put the teacher or administration into a position where they are having to haggle a physician to use a specific form.	
§126-(28)-(9) Standards for Preparing Students		
05-22	Katie Berry Program Coordinator kberry@access.k12.wv.us Monongalia County Starting Points 668 River Rd. Morgantown WV 26505	None
05-24	Marlene Midget Executive Director mmidget@npheadstart.org 51 16th Street Fourth Floor Wheeling WV 26003	Agree
06-07	Mary Jo Graham Professor graham@marshall.edu Marshall University School of Education 1 John Marshall Drive Huntington WV 25755	Why do you include kindergarten standards with the WVLELFSs and Head Start outcome measures? I'm concerned this wording would encourage teachers to insist upon including a kindergarten curriculum in their pre-k.
06-11	Karen Brunica Director Of Elementary Schools kbrunica@access.12.wv.us	9.2 What is "equipped as required"? Can't start out as ideal.

Wood County Schools
1210 13th Street
Parkersburg WV 26101

Policy 2525: West Virginia's Universal Access to a Quality early Education System

Comment Log

May 11, 2007 – June 11, 2007

Action Type
 N: No Response - Negative
 NA: Not Accepted + Positive
 A: Accepted o Neutral

Date	Individual/Organization	Comments	Action/Type	Rationale
5/15/07	Brenda Deist Berkeley County RESA VIII Head Start Teachers	Please do not change the pre-k Policy 2525 to require a minimum of 16 hours per week. I am a teacher for Berkeley county RESA VIII Head Start and currently teach 2 classes, 4 days per week, 3.5 hours each. At Head Start we pride ourselves in running a quality pre-k program. The children are in the class for a minimum of 12 hours. The additional hours per week are needed for developing age appropriate quality lesson plans, entering creativecurriculum.net data (which requires a minimum of 6,000 entries per class) collaborative planning with fellow teachers, participating in required training related to PreK, and maintaining a collaboration with our families through home visits and parent teacher conferences. A required 16 hours, would mean increase transportation cost because buses would have to operate 5 days a week. It would increase the number of substitutes needed because regular	A -	One of many comments from the Eastern Panhandle. Half day programs plus a strong parent components support high quality and are acceptable

05/17/07	Judith Woods Administrator Webster County jlwoods@access.k12.wv.us	classroom staff would need to be pulled for creativecurriculum.net data entry and professional development and home visits and parent teacher conferences. Please do not change the PreK policy 2525.	NA -	As per a decision by Dr. Paine (WVDE), Dr. Johnson (WVBE), Secretary Walker (WVDHHR), and First Lady Gayle Manchin, this language has been re moved from the policy (7.7)
5/31/07	Kelly Miller 112teacherabcs@comcast.net	I am a teacher with the RESA VIII Headstart program in Berkeley Co., and have worked with the program for 14 years, and I have always been proud of our program and the educational experience we have provided to the children we serve. That is why I feel compelled to comment on the state proposal of 126-28-3 to increase the minimum hours to 16. I would like to point out that if the in class time is increased the teacher planning time and record keeping time will decrease. This would not allow the teachers the time to prepare lesson plans and enter assessment data adequately. I think the time teachers spend planning and preparing lesson plans is vital as this time sets the tone of the entire learning experience for the child. I believe we need to	A-	One of many comments from the Eastern Panhandle. Half day programs plus a strong parent components support high quality and are acceptable

		<p>focus on the quality of the educational experience and keep education separate from child care. If we take away the time teachers spend assessing the child's progress and planning for the child's academic experience then we are not going to deliver a developmentally appropriate, educationally sound program. I understand that some programs would be able to meet this minimum hour requirement however, for a program like ours we would have to reduce the number of children we serve. The increase would also put more demands on our budget for transportation of children. Please keep the best interest of the children in mind when proposing changes.</p>		
6/05/07	<p>Jack & Jill Jackandjillpreschools@yahoo.com</p>	<p>128-28-3 3.18 The increase in the minimum hours per week required from 12 to 16 will have several detrimental effects. After meeting with some of the current Pre-k teachers, they seem to already be over-extended in terms of available time to complete all of their professional responsibilities. The enormous amount of creativecurriculum.net data that must be entered for each student is extremely time-consuming. Having partial day programs allows teachers to accomplish this and many other administrative tasks on Mondays. With the shortage of teachers in this area, we are concerned that we will have even more difficulty hiring qualified, dedicated teachers. It is understandable that most teachers interested in</p>	A-	<p>One of many comments from the Eastern Panhandle. Half day programs plus a strong parent components support high quality and are acceptable</p>

		<p>Pre-K would decide to take on a classroom without the burden of even more "take home" work.</p> <p>Additionally, we are concerned that an increase in classroom hours would prohibit the necessary teacher training hours. We would not be able to provide qualified day-to-day substitutes for teachers needing to be out of the classroom, if training has to occur during classroom days.</p> <p>As a private daycare partner offering Pre-K at both our facilities, we are also worried about the increase in the number of meals that would have to be served. We operate on a very tight budget and schedule. Changing the times would cause a conflict in getting meals served to all of our different age groups as well as having sufficient space for each age group, which include our before and after school age children.</p> <p>Many of our parents have also expressed concern about an increase in the number of hours. While they are pleased that a rigorous academic program from the state is being offered, they feel that their four year old children are not ready for a full day of school work, as many still need rest or nap time.</p> <p>With all of these concerns in mind, we do not think that an extension of hours would be beneficial. Berkeley County has been able to create and operate a high-quality WV Universal Pre-k program. We hope to maintain that level of educational availability to our community and do</p>		
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		<p>not feel that may be possible with an increase in required hours. We are concerned that these changes are being proposed because other counties around the state are not able to comply with current standards.</p>		
6/6/2007	<p>Laura Sutton / Berkeley County Schools</p> <p>Donna G. Miller/ Berkeley County Schools</p> <p>Ken Marstiller/ Berkeley County Schools</p> <p>George Michael/ Berkeley County Schools</p> <p>Chris Edwards/ Berkeley County Schools</p> <p>David Kenney/ Berkeley County Schools</p> <p>Jim Welton/ Berkeley County Schools</p> <p>David R. Duell/ Berkeley County Schools</p>	<p>\$126-28-3. Definitions.</p> <p>The increase in the minimum number of hours per week required for WV Universal Pre-K from 12 to 16 is of great concern. Our primary concerns are that the increase in hours will inhibit our ability to retain high quality staff members and decrease the quality of our district's programs.</p> <p>Because Berkeley County has limited space, the majority of our classrooms are partial day programs. This allows us to serve the largest number of eligible four-year olds in order to make two groups of 20 children in three-hour segments while still providing for drop off and pick up times, a duty free lunch for the teacher, and set up and clean up times. For the past few years, Berkeley County has operated a number of partial day programs on a Tuesday through Friday schedule.</p> <p>The proposed increase in hours affect the amounts of time that the teachers have for planning, meeting with parents, entering CreativeCurriculum.net data (a minimum of</p>	A-	<p>One of many comments from the Eastern Panhandle. Half day programs plus a strong parent components support high quality and are acceptable</p>

	<p>Berkeley County Schools</p> <p>Frank Alveto/ Berkeley County Schools</p> <p>Manny Arvon/ Berkeley County Schools</p>	<p>6,000 entries were required this year for teachers who have general education half-day classes with a total of 40 students), collaboration with other Pre-K teachers, participation in eligibility and IEP meetings, developmental testing of children referred for special education services, conducting screenings, participating in required training related to Pre-K. The benefit of a few additional contact hours will not exceed the benefit of a well-planned, intentional instructional design and quality interaction with parents and colleagues. This is an example of a time when quality outweighs quantity.</p> <p>In addition to the required training, Berkeley County offers additional staff development that enhances the Pre-K program. Next year, training will be offered in Creative Curriculum (company representative), CC.net (WVDE), ECERS-R (DHR/WVDE), CPR, first aid, ESL, mental health at it relates to pre-k children, Conscious Discipline, and art as a process for the Pre-K child. Additionally, training will be provided for new personnel on relevant policies and procedures and the Denver Developmental screening instrument. This is a minimum of 42 clock hours of training offered. Our county Pre-K committee believes these topics are important as we encounter diverse needs among our preschool population in our growing community.</p>		
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		<p>The change in hours will likely impact the amount of training offered because substitutes for all personnel participation would have to be provided. In a district in which a large percentage of classrooms are staffed by permanent substitutes due to a shortage of highly qualified personnel, day -to -day substitutes can be difficult to find.</p> <p>Our teachers currently spend a significant portion every Monday entering 6,000 observations they have to collect on their students into the required cc.net system. They must carefully consider where to rank the students on each of the 50 objectives as well as providing narrative observations online and often attaching digital images of students work. Next year, we had plans to increase our usage of the technology by incorporating more online parent participation components. All of our dedicated teachers have spent time after school and at home entering data for this system in addition to the planning time at school that has been afforded them by our program schedule. Even though the teachers had very little time to prepare for this change in data requirements, they have consistently met the prescribed state deadlines. I am concerned that these online data requirements coupled with the elimination of planning time and/or the lack of funding or availability of substitutes will</p>		
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		<p>encourage teachers to seek employment in adjacent higher paying states that are also moving towards increased Pre-K programs. Additionally, I believe that consistent use of substitutes to allow teachers time for data entry is not in the best interest of Pre-K children and consistency in their environments.</p> <p>Berkeley county has four child care partnerships for 2007-2008 and additional potential child care partners that have expressed an interest for subsequent school years. The child care partners on our committee have expressed concern about increase hours per week of Pre-K. Some of our child care centers serve both children who need wrap around care and children who are coming only for Pre-K hours. We provide a meal in each of the half day programs. The child care centers are also serving elementary children before and after school care. Increasing the hours of Pre-K and changing the times causes conflict with getting all the meals served properly to the different age groups and providing appropriate space for all the groups for before and after school care.</p> <p>Our Head Start partner is also affected by these changes. In addition to the same training and data entry issues that our county faces, head Start personnel have additional duty of conducting multiple home visits for each child. Increasing</p>		
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		<p>the hours of the program leaves very little time for these visits to occur.</p> <p>Our preschool special needs classes are impacted by this change because they have additional duties related to testing. They must provide developmental testing for all referred children, write eligibility reported, meet with parents, draft IEP's in addition to the same duties our general education teachers complete. Because of our population growth, our classes are often at the high end of allowable caseload. Additionally, we typically process over 100 referrals per year for students transitioning from Birth to Three or being referred from medical providers or child care. Our preschool special needs teachers and our school psychologist also spend numerous hours guiding the family through the transition process from Pre-k to K and involving the receiving primary school.</p> <p>Transportation, which is required for special needs students and offered to Head Start collaborative students, is also affected by the change in hours. An increase in the number of days per week that Pre-K operates will impact the cost of transportation. While Berkeley county operates separate bus runs for Pre-K students, the schedule impacts our K-12 transportation because</p>		
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some of the same vehicles are utilized for school-aged runs at different times of day.

Additionally, in our growing county, one of our buildings that is utilized as a Pre-K center by day is used for other programs in the evenings. While rooms are dedicated for each function, it is undesirable for Pre-K students and parents and secondary transitional students and parents to cross times. This also creates parking and traffic difficulties at the facility. Because of the additional requirements, we would either be forced to run preschool buses at a very early time in the morning to dismiss the second section if students in time for the transitional program to begin or to make the transitional program begin later in the evening. This could cause problems with preschoolers sleep and schedules or with recruiting teachers to work in the after school transitional program in a county that is already short on highly qualified professional personnel.

Finally, parents have expressed concern about the possibility of a change in schedule. A number of our parents have sought out part time programs because they want to enjoy some time at home with their child, want to have a day a week to schedule appointments, or feel that their child would do better in a half day setting.

		<p>Berkeley County Schools could meet the proposed requirement by moving to full-day programs, but then we would be serving only half as many students as we are currently able to serve. Even with the addition of new child care partners the next two years, we are still far short of serving the projected number of four -year-olds in our growing area. Unfortunately, our already crowded schools do not have extra rooms for additional Pre-K programs.</p> <p>We believe that Berkeley County operates a quality Pre-K program. Our commitment is making improvements in our program every year. The quality of instruction, the collaboration among child care, parents, teaches and head Start, and the retention of highly qualified staff are more important to our students, parents and staff than a few additional contact hours per week. We respectfully request that you reconsider this policy change.</p>		
		<p>126-28-8. Health and Safety Requirements</p> <p>8.2</p> <p>The reduction of a teacher caseload per day from 40 -30 is a concern. This means that we will</p>	<p>NA –</p>	<p>Teacher caseloads for pre-k are much larger than for other elementary grades.</p>

		<p>have to provide 25% more staffing to implement Pre-K programs. In addition to being a financial concern while we are purchasing furniture and curriculum materials to set up numerous new classrooms, locating 25 % more highly qualified staff while competing surrounding our-of state districts will be challenging.</p> <p>8.7 Currently EPSDT services are not offered through our county health department. It is unclear whether or not local physicians and the health department will be able to complete the vision, hearing, speech, dental, and developmental screenings as well as the physical examinations. Because of the growth of the community, h3ealth services are also in great demand.</p>	NA -	This is a locale specific issue
6/8/2007	Jennifer Potter/ Berkeley County parent	<p>126-28-1 General</p> <p>I think 12 hours per week is great. More than that, per day, is hard on the student that is preparing for school. 12 hours per week has been just right. Not too overwhelming</p>	A-	<p>One of many comments from the Eastern Panhandle. Half day programs plus a strong parent components support high quality and are acceptable</p>
		<p>126-28-8 Health and Safety Requirements</p> <p>I feel that 20 students in class is the best fit. Kids this age have a hard time focusing and adding</p>	No	The policy does set the limit for class size at 20.

	<p>more students to one classroom could be problematic and distracting and harder to manage, regardless of how many teachers, assistants and aids you have.</p>			
<p>126-28-8 Health and Safety Requirements</p>	<p>I feel younger children benefit the most from smaller sized classes. If the number of students is increased to 30 I think it will be difficult for the kids to pay attention, and if they are full day classes, difficult for the teachers to handle. More of our Berkeley Co. 4-year-olds can benefit from the current pre-K schedule-10 more kids per facility.</p>	<p>No</p>	<p>Class size are limited to 20 children.</p>	
<p>06/06/07</p>	<p>Michelle Seidel Director, The Mustard Seed Martinsburg, WV 25403</p>	<p>126-28-7 Personnel Standards In reviewing the revisions recommended for staff requirements I feel they are not giving early childhood educator's who have worked extremely hard to receive an Associates degree a change. For example: 1. I am 31 years old and I graduated from Delaware Technical and Community College in 1993 with an Associates Degree in Applied Science-Early Childhood Development. It took me five years to receive my Associates degree in addition to working two jobs just to put me through school. I was un to receive assistance through the school because I lived at home. When I received my degree, I was told I could work with</p>	<p>NA -</p>	<p>State law requires that teachers in public schools have four year degrees and be certified.</p>

children Kindergarten and under. This is the age group I like the most. I felt I wanted to get out there and start helping children instead of continuing my education towards a Bachelors Degree. I taught Pre-k for 10 years prior to becoming a Center Director and now I'm not even qualified to teach the age I adore unless it's a private pre-k. I know there are many pre-k teachers who would love to work for the school system and have Associate Degree. Why are they not getting the chance to teach. Specially when there are not enough teachers to cover the upper grades.

2. I have a state member who has just completed the Apprenticeship Program through WV, Department of Labor. She would like to continue her education and receive an Associates Degree in ECE. She has been teaching Pre-k for over 8 years and has an excellent program. I feel she would make a great asset to your Pre-K program would like to support her Journey by providing the Berkeley County with a space for her classroom when she graduates with an Associates Degree next year. If the changes go through, I will not be able to give up the space because its her classroom which would be given to the pre-k program and I don't want to lose

06/06/07	Dana Hennen Parent Falling Waters, WV 25419	<p>an excellent teacher.</p> <p>126-28-3 As a parent of a 4 year old in the pre-k program this year, I thought the 3 hours for 4 days was perfect for her. It introduced her to the routine of school and still allowed her to be a 'child' I would not have entered her in the program if it were full day!</p> <p>126-28-8 I am apposed to the full day for pre-k. As the program stands at ½ day, you are able to teach 40 children. By changing classes to full day, you would cut the class to 30 children. It would have been disappointed if my daughter would have been 1 of the 10 children cut from the program. PS Ms. Sharon Phillips has been wonderful! How Blessed we were to have her as our daughters teacher!</p>	A-	One of many comments from the Eastern Panhandle. Half day programs plus a strong parent components support high quality and are acceptable
6/9/2007	Teresa Clark/pre-k teacher Webster County	<p>126-28-2.Guidelines</p> <p>2.1 I question The only evaluation of the program success being the Early childhood Environmental Rating Scale. This seems to me to be a rating to the child's environment and I know tat is an important part of the quality program, but not a fair evaluation of program quality of success. It could be one part of a quality program. I would like to see the Ellco also used to evaluate programs. This also gives a good indication of the quality of literacy activities in the program and language develop being encouraged. Many children in our state come from homes where language development and book reading are not</p>	N o	The ELLCO is an excellent tool for literacy quality and programs have the option of using it.

		<p>encouraged. I feel this is an important part of a quality program.</p> <p>126-28-7. Personnel Standards</p> <p>3.26 I do not think someone who has a 2 year degree of any type can be as effective as a trained teacher with at least a 4 year degree. I take offense to this as a trained teacher. A four year degree in early childhood should be the minimum you would settle for. In no other classroom in the state would this be allowed or tolerated. Are young children less important?</p> <p>21 – The idea that a child should be allowed to nap when they feel like it is silly. No classroom can have children napping all day long if they feel like it</p> <p>22 – Is gross motor development and outdoor time considered the same? In WV wather does not allow children to go outside usually from November to April. Can time scheduled in a gym meet this criteria?</p> <p>Last I would like to comment on the restriction of 5 years olds not being allowed to enroll in WV pre-K. First this does not align with WV law which allows a parent to not enroll their child in</p>	<p>NA –</p> <p>NA –</p> <p>No</p> <p>A -</p>	<p>The issue is not the value of a certified teacher but rather the fact that certified teachers, if they are available, cannot be attracted to or retained by community programs because of pay and benefits.</p> <p>This is a misinterpretation of the policy; however, young children should be given the chance to rest if they are tired.</p> <p>The policy has been changed back to its original language.</p>
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	<p>Kindergarten until age 6. it also goes against parents being allowed to make the decision if their child is ready or not to participate in a group program. This seems to be punishing children for not fitting the mold of what a pre-k child should be.</p>		
6/11/07	<p>Terri Wontrobski/ Head Start Director Greenbrier County</p>	<p>126-28-14 Minimum Program Availability</p> <p>Minimum Program availability is being suggested to change to a minimum of 16 hours/week. This suggested change would eliminate the possibility of the Head Start combination program option. Part 1306.34 of the head Start performance Standards lists the combination program option, the number of class sessions and the number of home visits. Greenbrier County presently had 69 center days and 16 home visits a year. This follows the head Start performance Standards. Since 2525 and the head Start Performance Standards are purported to align, consideration is needed to be given in 2525 for the combination option.</p> <p>Wording for 2525 could be a head Start combination model that follows the Head Start performance Standards that has been approved by the head Start regional office will be accepted.</p> <p>A minimum of 108 instructional days will prohibit programs from having initial home visits</p>	<p>NA --</p>
			<p>Frequency, as well as intensity, of intervention matters if pre-k is to make a difference in children's ability and readiness for school. This model is slightly more than half the recommended contact.</p>

		<p>and home visits scheduled into their calendar during the year. A recommended number would be 102 instructional days to allow home visits.</p> <p>A minimum of 16 hours per week would require program to have a minimum of three days a week or five half days. In order to have a full time teacher with these hours, programs will have to choose between double sessions of three hours and fifteen minutes a day (2 per day) or a four day week program. That may well force school districts to choose a four day model while child care would choose a half day model and get child care funding for the remainder of the day. This allows for no flexibility for programs. Fourteen hours a week minimum would permit flexibility of a two day program.</p> <p>Large rural counties that are providing transportation to children have children with a very long day due to early bus runs and long bus runs. This travel time is <u>very</u> hard four or five days a week for a four year old. Greenbrier Head Start did a survey with their families and 85% preferred two or three days with home visits two times a month. Distance on the bus and gas costs for the distance (if parents drove) are major obstacles for rural counties.</p> <p>School districts in WV have set their budgets,</p>	<p>A-</p> <p>NA-</p> <p>NA -</p>	<p>Programs are allowed up to six days for home visit/conferences.</p> <p>Counties can offer a variety of models within the county.</p> <p>85 % of the Head Start eligible families does not reflect the total number of children eligible for pre-k. Greenbrier county needs to expand its program to meet the needs of the families who do not qualify for Head Start.</p>
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		<p>describing the individual providers is removed, “community early childhood provider” needs to be added to the definitions. In the same section, the WVHSA would like to add language that identifies that the classroom is jointly operated and supported.</p> <p>3.12 The WVHSA would like to see the last sentence to be changed adding the word “additional” between “one” and “year” as well as end the sentence with the words “in the best interest of the child.” The remaining words in that sentence need to be stricken. It is the feeling of the WVHSA that the decisions concerning placement of five year olds should be made by a multidisciplinary team.</p> <p>3.23 The WVHSA would like to see additional language that indicates that access is not limited to funding streams or a child’s ability. 126-28-6</p> <p>6.1 Add the words “active participation: after the word “meaningful” I the last sentence.</p> <p>6.3.3 Replace the word “joint” with “universal.” It is also felt that until universality is met in counties, a selection criteria needs to be jointly developed by collaborative teams to prioritize children who may need additional help or services. Partners need to describe how they will work together on determining selection or placement of children following the development</p>	<p>NA-</p> <p>NA-</p> <p>NA o</p> <p>NA o</p> <p>A -</p>	<p>Collaborative community partner is defined.</p> <p>Language in policy revision was changed to address this concern.</p> <p>W. Va. Code 18-5-44 requires voluntary universal pre-k for all four year olds</p> <p>This change has been made</p>
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		<p>of the universal application. This would include joint registration, selection and placement activities. A suggestion was made to have this process attached to the county pre-k plan.</p> <p>6.4. The WVHSA would like to affirm the additional language in this section.</p> <p>6.14 The WVHSA affirms the addition of this language and feels the use of a universal application is a very important tool in effective collaboration.</p> <p>126-28-7</p> <p>The WVHSA expresses concern over the changes to the personnel standards. While it is understood that it may have not the interpretation of 7.3 could lead to exclusive placement of LEA staff in all teaching positions in collaborative classrooms. This would be of particular concern in counties experiencing "Reduction in Force" for teachers. It is also felt that superintendents would continue to be in a position to approve placement of community program teachers in order to apply for the alternate route to certification. This could lead to the loss of employment by Head Start staff. Loss of employment could equate to loss of federal dollars.</p> <p>126-28-8</p> <p>8.2 The WVHSA is concerned with the provision of only one staff person at nap time. It is felt that staff:children ratio needs to be met at all times throughout the day.</p>	<p>N +</p> <p>N +</p> <p>A -</p>	<p>Language was added in section 7 to clarify that the community program is a viable employer for the teaching/ assisting staff</p> <p>This meets licensing guidelines for child care. Head starts may have a</p>
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		<p>8.5 With the current issues in childhood obesity in the country and especially the state of WV, it is felt that it is more imperative than ever that USDA guidelines are followed. There have been issues with staff consuming soda and other inappropriate foods in front of children and not placing them in a containers which would hide the identity of the food or drink. The WVHSA suggests use of language as follows: "Foods served must be high in nutrients and low in fat, sugar, and salt."</p> <p>8.7 Concern has been expressed with the use of the HealthCheck form. Not all pediatricians are utilizing this form, therefore, it would be expected that the form not become mandatory. The possibility of adding language which states the use of the form "per regulations of the operating agency."</p> <p>8.21 Members of the WVHSA expressed that there is a need to indicate a time limit for napping. They suggest one hour unless the child needs additional time. 126-28-10</p> <p>10.2 The WVHSA would like to express appreciation for maintaining standards outlined in this section.</p>	<p>NA -</p> <p>NA</p> <p>N +</p> <p>N+</p>	<p>lower ratio during naptime if they choose.</p> <p>Public school teachers can be encouraged but not mandated to eat school lunch.</p> <p>HealthCheck is not required but recommended</p>
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<p>are unique to WV Pre-k.. If they are not allowed to participate, it would hinder this opportunity. Additionally, it would be cause for a reduction in capacity to provide reliable evaluators in counties. This is due to Head Start directors, education managers, and at times, school principals may be in a of not being allowed to perform this duty. Head Start directors and education managers have the responsibility of supervision of staff within all of their sites and therefore would no longer be able to participate on these teams.</p>	NA -	<p>They can participate on the team but cannot have final say or review classrooms for which they are responsible</p>
<p>Linda McBee, Kay Nesselrote NCWVCAA-Head Start Fairmont, WV 26554</p>	NA -	<p>126-28-3 3.12 Consider adding for the child who may remain in the program for longer than one year <i>that it is based on appropriate intervention/assessment documentation as determined by a team to include pre-k teacher, a behavior support professional, and the child's parent just as it is if a 5 year old is to be placed in pre-k.</i> Also consider the fact that the 5 year old could take up space that HS might need for a low income 4 year old for their enrollment numbers. 3.20 Does paid staff member include Foster Grandparent/ 3.24 Universal application (change level for enrollment to level to determine placement and enrollment.)</p>
	N o	<p>The previous language from the current policy has been reinstated</p> <p>This is not a policy question but the answer is "no"</p> <p>Language clarified</p>
	A o	

		<p>126-28-6 6.4 and 6.6. First used <i>all core partners</i> then used <i>required collaborative partners</i>. Should use same term throughout.</p> <p>126-28-7 We would hope that it is not the intention for LEA's to replace HS Teachers with their Teachers if HS is able to meet the Personnel Standards. We would not want the loss of federal dollars to occur by losing HS teachers.</p> <p>126-28-8 8.2 1 staff:20 children at naptime does not meet HS performance standard</p> <p>8.5 1304.23(b)(ii) HS Performance Standards require that meals and snacks meet the USDA meal pattern or nutrient standard menu planning requirements outlined in 7 CFR. <i>For BOE's snacks are requested to be provided by parents in many cases. BOE's are not able to receive reimbursement for snacks.</i></p> <p>8.5 (b)(iii) All children in morning settings who have not received breakfast at the time they arrive must be served a nourishing breakfast. <i>If BOE's do not provide a family style breakfast to all children it should be noted that they must provide the opportunity for breakfast to the children who have not eaten.</i></p>	<p>A o</p> <p>N o</p> <p>NA -</p> <p>A o</p>	<p>Language clarified</p> <p>This meets child care licensing requirements. Head Starts may have lower ratios</p> <p>Changes made to reflect these concerns</p>
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		<p>(c)(4) All preschool children and assigned classroom staff, including volunteers, eat together family style and share the same menu to the extent possible. <i>This does not occur in many BOE sites. Very rarely does classroom staff eat with children even if they are helping with the meal.</i></p> <p>8.7 It is difficult for agencies to establish the same deadline with each having different requirements. Child Care Licensing requires 30 days not 45.</p> <p>8.11 add <i>in the same room.</i></p> <p>8.18 Consider adding <i>unless the bathroom is within the classroom.</i></p> <p>8.23 Add (s)taff</p> <p>12.4.1 change <i>lease to least There are two 12.4.1.</i></p> <p>126-28-15</p> <p>15.5 Add <i>No WV pre-k can charge fees with the exception of nutritional services.</i></p> <p>15.5.2 Add <i>In February of each year BOE must report to Community Partners the amount of money received from the school aid formula per classroom.</i></p>	<p>NA -</p> <p>N o</p> <p>A o</p> <p>NA o</p> <p>A o</p> <p>A o</p> <p>NA o</p> <p>NA o</p>	<p>If this requirement was made it would conflict for state law</p> <p>Change made Children should not be in the bathroom without supervision Typo corrected</p> <p>Typo corrected</p> <p>The policy as written reflects the intent of the revision committee</p> <p>This is available from the WVDE upon request</p>
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		<p>126-18-16</p> <p>6.2 ECERS-R is used as a part of our system of monitoring our HS operated classrooms and monitoring results are used as part of Performance Appraisals for individuals. Add <i>The Community Partner shall set up a performance evaluation system as per their own policies and procedures.</i></p>	<p>NA o</p>	
<p>6/11/07</p>	<p>Diane Ansari dansari@access.k12.wv.us RESA VII Head Start Director</p>	<p>Although I have several concerns, I will focus on two which will be devastating to our program if they remain as written.</p> <ol style="list-style-type: none"> 1. The requirement that children attend class 16 hours per week is of serious concern. Our staff works very hard entering the CC.Net information, planning lessons, doing home visits, interacting with school personnel in the transition process, participating in professional development and focusing on high quality opportunities for children. For double session classrooms, 16 hour per week would result in teacher having to conduct classes 5 days per week instead of the current 4. Our current options include a 12 hour per week option, a 14 hour per week option, a 26 hour per week option, and homebased. Each option is working well, and based on the results of our CC.Net reports, children are progressing very well in each option. The demands placed upon our staff are extraordinary, and they are doing 	<p>A -</p>	<p>The 12 hour requirement has been reinstated</p>

	<p>a wonderful job; however, I feel that this additional burden will result in teachers who are unable to maintain the quality services which are so important to our children. Please do not change the current policy in this regard.</p> <p>2. The limitation of a total caseload of 30 children for each teacher is a serious concern for us in the Eastern Panhandle. It fails to take into consideration issues including the cost of hiring additional staff to meet this ratio, the need for additional space to accommodate additional classrooms, and the problems related to finding and hiring qualified staff. This is a serious problem in the Eastern Panhandle. Each year we lose teachers to Loudon County because of serious salary disparity. Because of the growth in the county, additional space is not available.</p> <p>We have worked closely with our school and child care partners in Berkeley, Morgan, and Jefferson County to implement the pre-k plans. Dramatic changes at this stage of collaboration are not in the best interest of the Eastern Panhandle. I compare it to a young child who has just learned to walk and somebody comes along and knocks the child over. It is extremely important that we be given time to operate consistently and</p>	<p>NA -</p> <p>Pre-k teachers have a caseload far greater than any other elementary teacher. This limit is necessary to allow appropriate time for planning, individualization, assessment, and effective instruction.</p>
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06/11/07	Michelle Morris Teacher Grace Hanshew Aide Ann Novinger Family Service Worker RESA VIII	confidently for a substantial length of time before we are required to redesign all that we have done so far.		
		<p>To Whom It May Concern:</p> <p>We feel a requirement of 16 hours of instructional times for young children would not be beneficial to the children or the staff who work with those children.</p> <p>At this time I have 2 classes Tuesday through Friday, the morning class runs from 8-11:30 and the afternoon from 11:30 to 3:00. My classroom is located in a daycare center. The area we utilize for our classroom is shared with the school aged children and we are unable to extend our times during those days. The school children return to the daycare center at 3:15.</p> <p>Our Monday are used for imperative trainings, lesson planning, talking with team members, entries and leveling for creative curriculum, home visits, parent/teacher conferences, make up days from time missed due to bad weather and early dismissals by the public schools.</p> <p>I already do much work at home in preparation for our classes and completion of our assessments and portfolios. If a 16 hour week is made a requirement all of work will have to be done at home which I believe will lessen the quality of the work. Furthermore, there will be no time for important trainings to better our programs, not time to work with team members I our class, no</p>	A-	The 12 hour requirement has been reinstated

	<p>time to discuss ideas with other staff in the program. Our Head Start/Pre-k program also has 2 home visits and 2 parent teacher conferences to complete throughout the year. At this time most of them are done on Mondays and in the evenings, a 16 hour week will not allow us the time needed to complete these program requirements.</p> <p>I work in an outer site and do not have access to files or copy machines on a regular basis. If Mondays are taken away due to a 16 hour week, we will not long have the equipment necessary to have regular newsletters to our families. We will also not have adequate time to keep our files updated.</p> <p>I hope you understand the important of continuing a 12 hour minimum for our pre-k children. I believe this 12 hour minimum week allows staff time to prepare and give the children a quality program that will help them to succeed throughout school as well as their life.</p>	<p>6/11/07</p> <p>Valerie Colie 209 Titmouse Lane Hedgesville, WV 25427</p>
<p>A -</p>	<p>I am concerned about the proposed changes to the 2525 policy. It is important that this policy safeguard the quality of the pre-kindergarten programs, and I see that some of the changes suggested will threaten that quality because they threaten program flexibility.</p> <p>The change to a 16 hour minimum class time is a major impediment to maintaining quality. Children learn best when is a program that is well</p>	<p>The 12 hour requirement has been reinstated</p>

		<p>planned and developmentally appropriate. This change would prohibit our current level of staff training and cooperative planning time. For preschoolers to have an effective program, all those involved in that child's program should be involved in planning and sharing observations to that appropriate individualizations can be developed. Currently our program is offering 14 hours in most classrooms with our special needs collaborative program meeting 12 hours per week and providing regular home visits for families. We are able to include parent and aides in the planning process, insuring that the children get a program that best meets the family's and child's needs. We are able to provide regular training opportunities and to regularly review assessments when planning.</p> <p>Having worked with preschoolers for over 15 years, I have observed that our current schedule offers them a good balance of home/school time. This is essential since this is often their first experience away from home and they are often overwhelmed by their time away from home. I realize that this move is connected with funding issues and full day/half day status. It could be that for preschoolers, a different definition of full time should be considered. Because of their age, the same criteria are not applicable. Forcing children to meet an time frame established for older children is not in their best interest nor in the best interest of those who serve them.</p>	
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		<p>I am committed to quality serve for children and their families. I believe that quality early childhood programs are family based and require extra time for family contact that elementary education programs can not provide. Maintaining the current time-frame will allow current high standards to be maintained.</p> <p>Please reconsider this proposed change and retain the 12 hour minimum. A minimum is just that and programs may choose longer hours as best suits their program. Flexibility is the key to quality and allow local programs to determine what is most appropriate for those they serve.</p> <p>I also understand that the proposal would decrease the maximum number of children serve to 15 in each classroom. While the lower numbers are preferable, I recognize the hardship it would put on our programs. We would be required to increase the number of classrooms to serve the numbers we are currently serving and there is no room for additional classrooms. We are already struggling to meet the current demand for services and this would add undue hardship on the programs in the Eastern Panhandle. Our current rations meet daycare licensing regulations and have been serving our children well.</p> <p>Again, flexibility to meet local needs is the key. This move would not serve our community's needs and is not a necessary change for maintaining a quality program. Current levels have allowed us to serve our community, and</p>		
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		<p>meet the needs to parents and children in our program. Other programs across the state can choose to do otherwise, as fits the needs of their communities but legislating this change would be a real hardship to our area.</p> <p>I urge you to reconsider these changes to a policy that is currently providing excellent guidance for the programs it governs.</p>	
<p>6/11//07</p>	<p>Lisa D. Sykes sykes@gmail.com Preschool Special Needs Teacher Berkeley County</p>	<p>I have been a preschool special needs teacher in Berkeley County for the past six years, and a referral agent for the last four years. Teaching special needs preschool students is critical for their future success in school. This quality service provided cannot be done without a day to do the increasing amount of paper work and meetings with parents. In six years, I have watched our program take an exponential increase from 30 students to 192 students. This means that the teachers are constantly receiving referrals. We receive at least three referrals a week during the school year. The IEP season for preschool special needs teachers is from the first day of school to the last day of school. This means that every Monday the teachers are testing students, attending eligibility meeting, drafting IEP's etc. This is only one example of the work that must be completed on Monday.</p> <p>I have twenty one students. I have to do 50 observation narratives on my twenty one students. This means that I must complete 1050 observations and score each one three times per</p>	<p>N o</p>

		<p>year. Most of these observations are done either after school or at home. It is difficult to finish paper work demands even with Monday with no students.</p> <p>Planning for lessons and writing behavior plans with teacher assistants must be done on Mondays. Preschool is constantly growing and changing. Training sessions are essential to keep up with new curriculum requirements. At least half of my students make the transition to elementary school. This means more paper work and meetings with other teachers, parents, therapist, and school psychologist.</p> <p>The quality preschool special needs program CANNOT FUNCTION without the preparation and conference day on Monday. I am a certified teacher with my master's degree who will be forced to leave this position to go to another state if this new policy change occurs. I will then make at least ten thousand more a year and I will have more resources to teach in a quality program. I will then not have to take all of my paper work home on the evening and weekends.</p> <p>The number of hours may increase if this policy is put into place, but the students will be working with substitute teachers or only the teaching assistants. I will have to leave my classroom to attend meetings, work on creative curriculum observations, evaluate students etc. Substitute teachers generally do not even have a degree in education.</p>	
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	<p>Please do not sacrifice quality for quantity. I refuse to work in a program that only considers quantity. West Virginia cannot afford to lose anymore certified teachers. Our special needs students deserve a quality program.</p>		
6/11/07	<p>Janet Lilly, Asst Superintendent Raleigh County Schools jlilly@access.k12.wv.us</p>	<p>126-28-1 The law does not provide for an oversight agency. The board has the responsibility for pre-k collaboration without the ability to enforce this policy. 126-28-2 126-28-3 3.9 Raleigh County's best effort were used to have regularly scheduled collaborative meetings, and from those meetings plan a pre-k system to meet the needs of our students. WE were successful to meet the standards of WVDE, failed to be approved by WVDHHR. 3.10 Vague language...good teachers do not need this section</p>	<p>N - N - NA - N o N -</p>
	<p>3.12 Is this the School Assistance Team? 126-28-4</p>		<p>The revision committee felt this section was necessary</p>
	<p>4.1.1. Home visits can be dangerous for teachers. Should this be in policy? 126-28-6</p>		

	<p>6.1 Why does the LEA write and submit the plan to the WVDHHR? Raleigh County had meaningful collaborative involvement but our plan was not approved by WVDHHR.</p> <p>6.2 I realize this section is a reflection of the law but it is very troubling.</p> <p>6.3 Is early childhood team, the collaborative? 126-28-7</p> <p>Raleigh County is in full support of fully certified teachers for our pre-k programs. 126-28-8</p> <p>8.5 The pre-k lunch in our school is well supervised but with some configurations and health and safety issues may not all be serving family style meals.</p> <p>8.7 Schools do not require a health screening for entrance into kindergarten. It is certainly a good idea but will our public school students be excluded? 126-28-14</p> <p>Is there oversight for pre-k? Who audits the funding streams if collaborative partner does not meet the terms of the contract? What happens? 126-28-1</p>	<p>N -</p> <p>N -</p> <p>N o</p> <p>N o</p> <p>N o</p> <p>N o</p> <p>N o</p>	<p>It's the law 18-5-44</p> <p>Language clarified</p>
<p>6/11/07</p>	<p>Pamela Bishop Preschool Specialist Wyoming County Schools pbishop@access.k12.wv.us</p>	<p>A -</p>	<p>Language reinstated 3.12</p>

		<p>policy. 126-28-4 Parental choice is important. Do not take this out of the Policy. 126-28-6 Is the county plan still submitted yearly. I could not tell by reading this. 126-28-8 It needs to clearly state that we can accept other forms besides the healthcheck form if that is in the intention. Reading the policy seems to indicate this can happen. Do we stop doing screenings for Vision, Speech, Hearing, and Development that we (school system) have always provided and only accept them from a doctor? I do like the time taken out of providing rest time during the day. In some of our classrooms, child went from our setting to daycare that make children have a 2 hour nap. We had to take this into consideration in planning our rest times.</p>	<p>N o N o N +</p>	
6/11/07	<p>Linda Yokum Retired special education teacher Morgantown, WV yokuml@verizon.net</p>	<p>I am a retired special education teacher and the mother of a pre-school special education teacher in Berkeley County. When my daughter first started to teach in Berkeley County, she had approximately 12 students. That number has now grown to 21 students this year. All of these students need Individual Education Plans which take about 2 hours for the meetings</p>	<p>N o</p>	

		<p>plus many more hours to prepare. At the same time that her numbers have increased, services such as occupational and physical therapy have decreased.</p> <p>Then this year they were asked to implement the creative curriculum which takes at least 6 working days to Complete. When my daughter was home for spring break, she worked on school related work the entire week.</p> <p>Now I understand that the day that they had for home visits, IEP meetings and work on the creative curriculum is being taken away. She cannot possibly do all of the required work without this day of preparation. She will be Forced to go to another state or just quit teaching completely. Please retain the preparation day.</p> <p>Please do not demand more and more of our teachers before they all leave the field or the state.</p>	
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Cathy Jones

From: Linda Yokum [yokuml@verizon.net]
Sent: Monday, June 11, 2007 9:27 AM
To: Cathy Jones
Subject: Teaching Load for Pre-School

Dear Ms. Jones,

I am a retired special education teacher and the mother of a pre-school special education teacher in Berkeley County.

When my daughter first started to teach in Berkeley County, she had approximately 12 students. That number has now grown to

21 students this year. All of these students need Individual Education Plans which take about 2 hours for the meetings

plus many more hours to prepare. At the same time that her numbers have increased, services such as occupational and

physical therapy have decreased.

Then this year they were asked to implement the creative curriculum which takes at least 6 working days to complete. When my daughter was home for spring break, she worked on school related work the entire week.

Now I understand that the day that they had for home visits, IEP meetings and work on the creative curriculum

is being taken away. She cannot possibly do all of the required work without this day of preparation. She will be

forced to go to another state or just quit teaching completely. Please retain the preparation day.

Please do not demand more and more of our teachers before they all leave the field or the state.

Yours truly,

Linda Yokum
63 Herrington Manor Drive
Morgantown, WV 26508

126CSR28

POLICY 2525: West Virginia's Universal Access to a Quality Early Education System

COMMENT PERIOD ENDS: June 11, 2007

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2525: West Virginia's Universal Access to a Quality Early Education System. Additional sheets may be attached, if necessary.

Name: Pamela Bishop

Organization: Wyoming County Schools

Title: Preschool Specialist

Street Address: P.O. Box 69,

City: Pineville State: WV Zip: 24874

Please check the box below that best describes your role.

- | | | |
|---|---|--|
| <input type="checkbox"/> School System Superintendent | <input checked="" type="checkbox"/> School System Staff | <input type="checkbox"/> Parent/Family |
| <input type="checkbox"/> Principal | <input type="checkbox"/> Teacher | <input type="checkbox"/> Business/Industry |
| <input type="checkbox"/> Professional Support Staff | <input type="checkbox"/> Service Personnel | <input type="checkbox"/> Community Member |

COMMENTS/SUGGESTIONS

§126-(#)-1. General.

I do not like that parent choice has been taken out of the Policy. As a parent and an educator, I always want to know the options for my child's education. Removing parental choice takes those options away, and gives control of my child's education to the agencies. Parental choice has always been one of the most positive parts of this policy.

§126-(28)-(2). Guidelines.

§126-(28)-(3). Definitions.

§126-(28)-(4). Parent/Guardian Involvement and Family Support.

Parental choice is important. Do not take this out of the Policy.

§126-(28)-(5). Attendance.

§126-(28)-(6). Collaboration and the County Plan.

Is the county plan still submitted yearly? I could not tell by reading this.

§126-(28)-(7). Personnel Standards

§126-(28)-(8). Health and Safety Requirements

It needs to clearly state that we can accept other forms besides the healthcheck form if that is in the intention. Reading the policy completely seems to indicate this can happen.

Do we stop doing screenings for Vision, Speech, Hearing, and Development that we(school system) have always provided, and only accept them from a doctor?

I do like the time taken out of providing rest time during the day. In some of our classrooms, children went from our setting to daycares that make children have a 2 hour

126CSR28

nap. We had to take this into consideration in planning our rest times.

§126-(28)-(9). Standards for Preparing Students.

§126-(28)-(10). Curriculum and Assessment.

§126-(28)-(11). Transition and Continuity

§126-(28)-(12). Inclusive Environments.

§126-(28)-(13). Staff Development and Training.

126CSR28

§126-(28)-(14). Program Oversight.

§126-(28)-(5). Financing.

§126-(28)-(16). Program Evaluation for Quality Improvement.

Please direct all comments to:

Cathy R. Jones, Ed.D
Office of Special Programs, Extended and Early Learning
West Virginia Department of Education
Capitol Building 6, Room 304
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-3741

Sea



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- DATA

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ONLINE COMMENT FORM

POLICY 2525: West Virginia's Universal Quality Early Education System



AntiSpam Measure

1 + 10 =

This is to prevent spammers from using computer software to s form. If you don't answer this correctly we'll assume you are sp comments will not be accepted.

Name: Janet Lilly

Organization: Raleigh County Schools

Email: jlilly@access.k12.wv.us

Title: Assn't Supt.

Address Line 1: 105 Adair St

Address Line 2:

City: Beckley

Select the Box that best describes your role

- Superintendent
- Parent/Family
- Teacher
- Professional Support Staff
- School System
- Principal
- Business/Indust
- Service Person
- Community Member

section 126-(#)-1. General.

The law does not provide for an oversight agency. The LEA has most of the responsibility for the pre-k collaborative and the ability to enforce this policy.

section 126-(28)-(2). Guidelines.

2.1 I strongly support professional educators as our primary

section 126-(28)-(3). Definitions.

3.9 Raleigh County's best efforts were used to have regular collaborative meetings, and from those meetings, plan a way to meet the needs of our students. WE were successful to meet standards of WVDE, failed to be approved by WVDHHR

3.10 Vague language...good teachers do not need this section

3.12 Is this the School Assistance Team?

section 126-(28)-(4). Parent/Guardian Involvement and Family

4.1.1 Home visits can be dangerous for teachers. Should there be a policy?

section 126-(28)-(5). Attendance.

section 126-(28)-(6). Collaboration and the County Plan.

6.1 Why does the LEA write and submit to the WVDHHR? Raleigh had meaningful collaborative involvement, but our plan was not approved by WVDHHR.

6.2 I realize this section is a reflection of the law, but it is very troubling

6.3 Is early childhood team, the collaborative?

section 126-(28)-(7). Personnel Standards

Raleigh County Schools is in full support of fully certifi
for our pre-k programs.

section 126-(28)-(8). Health and Safety Requirements

8.5 The pre-k lunch in our schools is well supervised, b
configurations, and health and safety issues may not all
style meals.

8.7 Schools do not require a health screening for entranc
kindergarten. It is certainly a good idea, but will our
students be excluded?

section 126-(28)-(9). Standards for Preparing Students.

section 126-(28)-(10). Curriculum and Assessment.

section 126-(28)-(11). Transition and Continuity

section 126-(28)-(12). Inclusive Environments.

section 126-(28)-(13). Staff Development and Training.

section 126-(28)-(14). Program Oversight.

Is there oversight for pre-k? Who audits the funding stream? If a collaborative partner does not meet the terms of the contract, what happens?

section 126-(28)-(5). Financing.

section 126-(28)-(16). Program Evaluation for Quality Improvement.

Submit your Comments

Comments can also be mailed or faxed to:

Cathy R. Jones, Ed.D

Office of Special Programs, Extended and Early Learning

West Virginia Department of Education

Capitol Building 6, Room 304

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330

Fax No.: (304) 558-3741

Cathy Jones

From: Lisa Sykes [lsykes@gmail.com]
Sent: Sunday, June 10, 2007 9:55 PM
To: ctrjones@access.k12.wv.us
Subject: Teacher comment on 2525

Cathy R. Jones,

I have been a preschool special needs teacher in Berkeley County for the past six years, and a referral agent for the last four years. Teaching special needs preschool students is critical for their future success in school. This quality service provided cannot be done without a day to do the increasing amount of paper work and meetings with parents. In six years, I have watched our program take an exponential increase from 30 students to 192 students. This means that the teachers are constantly receiving referrals. We receive at least three referrals a week during the school year. The IEP season for preschool special needs teachers is from the first day of school to the last day of school. This means that every Monday the teachers are testing students, attending eligibility meeting, drafting IEP's etc. This is only one example of the work that must be completed on Monday.

I have twenty one students. I have to do 50 observation narratives on my twenty one students. This means that I must complete 1050 observations and score each one three times per year. Most of these observations are done either after school or at home. It is difficult to finish paper work demands even with Monday with no students.

Planning for lessons and writing behavior plans with teacher assistants must be done on Mondays. Preschool is constantly growing and changing. Training sessions are essential to keep up with new curriculum requirements. At least half of my students make the transition to elementary school. This means more paper work and meetings with other teachers, parents, therapist, and school psychologist.

The quality preschool special needs program CANNOT FUNCTION without the preparation and conference day on Monday. I am a certified teacher with my master's degree who will be forced to leave this position to go to another state if this new policy change occurs. I will then make at least ten thousand more a year and I will have more resources to teach in a quality program. I will then not have to take all of my paper work home on the evening and weekends.

The number of hours may increase if this policy is put into place, but the students will be working with substitute teachers or only the teaching assistants. I will have to leave my classroom to attend meetings, work on creative curriculum observations, evaluate students etc. Substitute teachers generally do not even have a degree in education.

Please do not sacrifice quality for quantity. I refuse to work in a program that only considers quantity. West Virginia cannot afford to lose anymore certified teachers. Our special needs students deserve a quality program.

Sincerely,

Lisa D. Sykes, Preschool Special Needs Teacher

Cathy Jones

From: valerie [sprucend@earthlink.net]
Sent: Monday, June 11, 2007 3:51 AM
To: ctrjones@access.k12.wv.us
Subject: Policy2525

I am concerned about the proposed changes to the 2525 policy. It is important that this policy safeguard the quality of pre-kindergarten programs, and I see that some of the changes suggested will threaten that quality because they threaten program flexibility.

The change to a 16 hour minimum class time is a major impediment to maintaining quality. Children learn best when is a program that is well planned and developmentally appropriate.

This change would prohibit our current level of staff training and cooperative planning time. For preschoolers to have an effective program, all those involved in that child's program should be involved in planning and sharing observations so that appropriate individualizations can be developed. Currently our program is offering 14 hours in most classrooms with our special needs collaborative program meeting 12 hours a week and providing regular home visits for families. We are able to include parents and aides in the planning process, insuring that the children get a program that best meets the family's and child's needs. We are able to provide regular training opportunities and to regularly review assessments when planning.

Having worked with preschoolers for over 15 years, I have observed that our current schedule offers them a good balance of home/school time. This is essential since this is often their first experience away from home and they are often overwhelmed by their time away from home.

I realize that this move is connected with funding issues and full day/half day status. It could be that for preschoolers a different definition of full time should be considered. Because of their age, the same criteria are not applicable. Forcing children to meet a time frame established for older children is not in their best interest nor in the best interest of those that serve them.

I am committed to quality service for children and their families. I believe that quality early childhood programs are family based and require extra time for family contact that elementary education programs can not provide. Maintaining the current time-frame will allow current high standards to be maintained.

Please reconsider this proposed change and retain the 12 hour minimum. A minimum is just that, and programs may choose longer hours as best suits their program. Flexibility is the key to quality and allows local programs to determine what is most appropriate for those they serve.

I also understand that the proposal would decrease the maximum number of children served to 15 in each classroom. While lower numbers are preferable, I recognize the hardship it would put on our programs. We would be required to increase the number of classrooms to serve the numbers we are currently serving and there is no room for additional classrooms. We are already struggling to meet the current demand for services, and this would add undue hardship on the programs in the Eastern Panhandle. Our current ratios meet daycare licensing regulations and have been serving our children well.

Again, flexibility to meet local needs is the key. This move would not serve our community's needs and is not a necessary change for maintaining a quality program. Current levels have allowed us to serve our community, and meet the needs of parents and children in our program. Other programs across the state can choose to do otherwise, as fits the needs of their communities, but legislating this change would be a real hardship to our area.

I urge you to reconsider these changes to a policy that is currently providing excellent guidance for the programs it governs.

Valerie Colie
209 Titmouse Lane
Hedgesville, WV 25427

POLICY 2525: West Virginia's Universal Access to a Quality Early Education System

COMMENT PERIOD ENDS: June 11, 2007

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2525: West Virginia's Universal Access to a Quality Early Education System. Additional sheets may be attached, if necessary.

Name: Lena Rapp, Becky Gooch-Erbacher **Organization:** West Virginia Head Start Association

Title: Head Start State Collaboration Director, WVHSA Executive Director

Street Address: 170 Chapel Road

City: Wheeling **State:** WV **Zip:** 26003

Please check the box below that best describes your role.

- | | | |
|---|--|--|
| <input type="checkbox"/> School System Superintendent | <input type="checkbox"/> School System Staff | <input type="checkbox"/> Parent/Family |
| <input type="checkbox"/> Principal | <input type="checkbox"/> Teacher | <input type="checkbox"/> Business/Industry |
| <input type="checkbox"/> Professional Support Staff | <input type="checkbox"/> Service Personnel | <input checked="" type="checkbox"/> Community Member |

COMMENTS/SUGGESTIONS
§126-(#)-1. General.
<p>§126-(28)-(2). Guidelines.</p> <p>2.1.3: The WVHSA would like to see all three approved curricula listed. If not, keep the language as it was. There is a fear that "curricular framework" may be misinterpreted by some partners to the extent that the main curriculum will simply be used as a supplement.</p> <p>2.1.5: The same statement as above applies to this section.</p> <p>2.1.9: The current language of this section has the appearance that would allow counties to have one outside evaluator in place of a team. Alternate language could include the</p>

following: "or a team including outside experienced evaluators".

§126-(28)-(3). Definitions.

3.2: The WVHSA voiced concern that adequate supervision must include wording that the staff must be in the room.

3.5: The WVHSA believes that if language describing the individual providers is removed, "community early childhood provider" needs to be added to the definitions. In this same section, the WVHSA would like to add language that identifies that the classroom is jointly operated and supported.

3.12: The WVHSA would like to see the last sentence to be changed adding the word "additional" between "one" and "year" as well as end the sentence with the words "in the best interest of the child." The remaining words in the sentence to be stricken. It is the feeling of the WVHSA that decisions concerning placement of five year olds be made by a multi-disciplinary team.

3.23: The WVHSA would like to see additional language that indicates that access is not limited to funding streams or a child's ability.

3.24: Add the words "to determine" after the word "level" and strike the word "for".

§126-(28)-(4). Parent/Guardian Involvement and Family Support.

§126-(28)-(5). Attendance.

§126-(28)-(6). Collaboration and the County Plan.

6.1: Add the words "active participation" after the word "meaningful" in the last sentence.

6.3.3: Replace the word "joint" with "universal". It is also felt that until universality is met in counties, a selection criteria needs to be jointly developed by collaborative teams to prioritize children who may need additional help or services. Partners need to describe how they will work together on determining selection or placement of children following the development of the universal application. This would include joint registration, selection and placement activities. A suggestion was made to have this process attached to the county pre-k plan.

6.4: The WVHSA would like to affirm the additional language to this section.

6.14: The WVHSA affirms the addition of this language and feels the use of a universal application is a very important tool in effective collaboration.

§126-(28)-(7). Personnel Standards

The WVHSA expresses concern over the changes to personnel standards. While it is understood that it may have not been the intention, the interpretation of 7.3 could lead to exclusive placement of LEA staff in all teaching positions in collaborative classrooms. This would be of particular concern in counties experiencing "Reduction in Force" (RIF) for teachers. It is also felt that superintendents would continue to be in a position to approve the placement of community program teachers in order to apply for the alternate route to certification. This could lead to the loss of employment by Head Start staff. Loss of employment could equate to loss of federal dollars.

§126-(28)-(8). Health and Safety Requirements

8.2: The WVHSA is concerned with the provision of only one staff person at nap time. It is felt that staff:children ratio needs to be met at all times through out the day.

8.5: With the current issues with childhood obesity in the country and especially the state of WV, it is felt that it is more imperative than ever that USDA guidelines are followed.

There have been issues with staff consuming soda and other inappropriate foods in front of children and not placing them in a container which would hide the identity of the food or drink.

The WVHSA suggests use of language as follows: "Foods served must be high in nutrients and low in fat, sugar and salt."

8.7: Concern has been expressed with the use of the HealthCheck form. Not all pediatricians are utilizing this form, therefore, it would be expected that the form not become mandatory. The possibility of adding language which states the use of a form "per regulations of the operating agency".

8.21: Members of the WVHSA expressed that there is a need to indicate a time limit for napping. They suggest one hour unless the child needs additional time.

§126-(28)-(9). Standards for Preparing Students.

§126-(28)-(10). Curriculum and Assessment.

10.2: The WVHSA would like to express appreciation for maintaining the standards

outlined in this section.

§126-(28)-(11). Transition and Continuity

§126-(28)-(12). Inclusive Environments.

12.4.2: The WVHSA strongly supports this language and would expect that it will stay in tact.

12.5: The WVHSA feels that pre-k plans need to identify self contained preschool special needs classrooms and furthermore need to provide rationale why they are self contained. The WVHSA strongly advocates for inclusive settings and elimination of dual placement of children whenever possible.

§126-(28)-(13). Staff Development and Training.

13.3: The WVHSA agrees with this requirement. There is concern that this may not be provided in counties. It is felt that the pre-k plans need to identify when planning will occur for classrooms.

§126-(28)-(14). Program Oversight.

Stricken item 15.3: The WVHSA expresses concern that it has not been provided with information from the report that is provided to the legislature. If there is a location this information is provided for the public, please provide information on how to access it.

§126-(28)-(5). Financing.

15.5: Strike the first sentence and replace with "No WV Pre-k program can charge any fees to parents with the exception of WVIES nutrition services under the sliding scale and full price lunches and breakfasts.

15.5.2: Members of the WVHSA would like to add language to this section requiring LEA's to disclose the funds that are generated from the collaborative classrooms to their respective community partners.

§126-(28)-(16). Program Evaluation for Quality Improvement.

16.1: It is felt that allowing for local administrators to evaluate classrooms increases their ability to understand the requirements that are unique to WV Pre-k. If they are not allowed to participate, it would hinder this opportunity. Additionally, it would be cause for a reduction in capacity to provide reliable evaluators in counties. This is due to Head Start directors, education managers and, at times, school principles may be in a

126CSR28

position of not being allowed to perform this duty. Head Start directors and education managers have the responsibility of supervision of staff within all of their sites and therefore would no longer be able to participate on these teams.

Please direct all comments to:

Cathy R. Jones, Ed.D
Office of Special Programs, Extended and Early Learning
West Virginia Department of Education
Capitol Building 6, Room 304
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-3741

Cathy Jones

From: Diane Ansari [dansari@access.k12.wv.us]
Sent: Monday, June 11, 2007 4:12 PM
To: ctrjones@access.k12.wv.us
Subject: comments on 2525

Hi Kathy, First and most importantly, I am very very sorry to hear that you are leaving your position and the state. You have been absolutely magnificent in facilitating the creation of the Universal Pre-K program in West Virginia. I wish you the very best, and you will be missed terribly. Diane

Although I have several concerns, I will focus on two which will be devastating to our program if they remain as written.

1. The requirement that children attend class 16 hours per week is of serious concern. Our staff works very hard entering the CC.Net information, planning lessons, doing home visits, interacting with school personnel in the transition process, participating in professional development, and focusing on high quality opportunities for children. For double session classrooms, 16 hours per week would result in teachers having to conduct classes 5 days per week instead of the current 4. Our current options include a 12 hour per week option, a 14 hour per week option, a 26 hour per week session and home-based. Each option is working well, and based on the results of our CC.Net reports, children are progressing very well in each option. The demands placed upon our staff are extraordinary, and they are doing a wonderful job; however, I feel that this additional burden will result in teachers who are unable to maintain the quality services which are so important to our children. Please do not change the current policy in this regard.
2. The limitation of a total caseload of 30 children for each teacher is a serious concern for us in the Eastern Panhandle. It fails to take into consideration issues including the cost of hiring additional staff to meet this ratio, the need for additional space to accommodate additional classrooms, and the problems related to finding and hiring qualified staff. This is a serious problem in the Eastern Panhandle. Each year we lose teachers to Loudon County because of the serious salary disparity. Because of the growth in the county, additional space is not available.

We have worked closely with our school and child care partners in Berkeley, Morgan, and Jefferson Counties to implement the pre-k plans. Dramatic changes at this stage of the collaboration are not in the best interest of the Eastern Panhandle. I compare it to a young child who has just learned to walk, and somebody comes along and knocks the child over. It is extremely important that we be given time to operate consistently and confidently for a substantial length of time before we are required to redesign all that we have done so far.

Thank you for addressing these concerns. My best wishes always. Diane Ansari , RESA VIII Head Start/Pre-K

Cathy Jones

From: Lesmmorris@aol.com
Sent: Monday, June 11, 2007 11:37 AM
To: ctrjones@access.k12.wv.us
Subject: POlicy 2525

To whom it may concern

We feel a requirement of 16 hours of instructional times for young children would not be beneficial for the children or the staff who work with those children.

At this time I have 2 classes Tuesday thru Friday, the morning class runs from 8-11:30 and the afternoon from 11:30-3:00. My classroom is located in a daycare center. The area we utilize for our classroom is shared with the school-aged children and we are unable to extend our times during those days. The school children return to the daycare center at 3:15.

Our Mondays are used for imperative trainings, lesson planning, talking with team members, entries and leveling for the creative curriculum, home visits, parent/teacher conferences, make-up days from time missed due to bad weather and early dismissals by the public schools.

I already do much work at home in preparation for our classes and completion of our assessments and portfolios. If a 16 hour week is made a requirement all of this work will have to be done at home which I believe will lessen the quality of the work. Furthermore, there will be no time for important trainings to better our program, no time to work with the team members in our own class, no time to discuss ideas with other staff in the program. Our Head Start/Pre-K program also has 2 home visits and 2 parent/teacher conferences to complete throughout the year. At this time most of them are done on Mondays and in the evenings, a 16 hour week will not allow us the time needed to complete these program requirements.

I work in an outer site and do not have access to files or copy machines on a regular basis. If Mondays are taken away due to a 16 hour week we will no longer have the equipment necessary to have regular newsletters to our families. We will also not have adequate time to keep our files updated.

I hope you understand the importance of continuing a 12 hour minimum for our Pre-K children. I believe this 12 hour minimum week allows staff time to prepare and give the children a quality program that will help them to succeed throughout school as well as their life.

Sincerely,

Michelle Morris, MA -Teacher at RESA VIII Head Start in Berkeley County
Grace Hanshaw - Aide / Home Visitor
Ann Novinger - Family Service Worker

See what's free at AOL.com.

6/13/2007

From Nobody <nobody@wvde.state.wv.us>



Sent Friday, June 8, 2007 3:13 pm

To fibanez@wvde.state.wv.us , ctrjones@access.k12.wv.us

Subject Comment Received for Policy 2525 (2007-06-08 15:13:04)

Please save this email in a "Comments Received Online" folder. Your folder will be a backup. All comments are saved in our database. The Complete Comments Report from the database can be found here: <http://129.71.2.32/r.html?id=c111c98fb15f6cc4d70b69060b8abc65> This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 2525

#####

Name: jennifer trippett
Organization: cubbys child care center
Email: cubbys449@msn.com
Title: director
Address1: 801 Genesis Blvd.
Address2:
City/State/Zip: bridgeport, wv 26330
Role:
Posted: 2007-06-08 15:13:04
Posted from IP: 154.37.238.34

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Changing the wordage and saying that Child Care centers should give a discounted rate is not fair. These kids would be in my program regardless of whether we were doing PRE K or not. I much preferred the way it was originally stated. That Pre K was an enhancement to our program. That is a much more accurate statement of what is actually happening!!

Comments for section 126-(28)-(7) Personnel Standards

changing the requirements for collaborative settings to hire their own staff would make collaborating very difficult!! Please reconsider

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

From Nobody <nobody@wvde.state.wv.us>

Sent Friday, June 8, 2007 1:31 pm

To fibanez@wvde.state.wv.us , ctrjones@access.k12.wv.us

Subject Comment Received for Policy 2525 (2007-06-08 13:31:55)

Please save this email in a "Comments Received Online" folder. Your folder will be a backup. All comments are saved in our database. The Complete Comments Report from the database can be found here: <http://129.71.2.32/r.html?id=c111c98fb15f6cc4d70b69060b8abc65> This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 2525

#####

Name: Sandra Panrell
Organization: WVUH Child Development Center
Email: panrells@wvuh.com
Title: Director
Address1: PO Box 8012
Address2:
City/State/Zip: Morgantown, WV 26506
Role: Business-Industry
Posted: 2007-06-08 13:31:55
Posted from IP: 157.182.216.2

Comments for section 126-(#)-1 General

I support all the West Virginia Child Care Centers United comments regarding the revisions of Policy 2525.

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

From Nobody <nobody@wvde.state.wv.us>

Sent Friday, June 8, 2007 11:51 am

To fibanez@wvde.state.wv.us , ctrjones@access.k12.wv.us

Subject Comment Received for Policy 2525 (2007-06-08 11:51:14)

Please save this email in a "Comments Received Online" folder. Your folder will be a backup. All comments are saved in our database. The Complete Comments Report from the database can be found here: http://129.71.2.32/r.html?id=c111c98fb15f6cc4d70b69060b8abc65 This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 2525

#####

Name: Susan Miller
Organization: WVCCU
Email: millers@marshall.edu
Title: President
Address1: 520 22 Street
Address2:
City/State/Zip: Huntington, WV 25703
Role:
Posted: 2007-06-08 11:51:14
Posted from IP: 24.210.123.156

Comments for section 126-(#)-1 General

We support 50% collaboration of community partners and appreciate the committee's role in continuing this rule.

Comments for section 126-(28)-(2) Guidelines

- Many quality collaborations are taking place all over the state. But, there are many that are not getting adequate funding to support their program. All child care centers should receive adequate funding to support their centers.
- The LEA shall provide funding for the community program to hire the pre-K teacher if the community programs prefer this model to the model of having a teacher placed by the LEA.
- 2525 states that by 2013 we will only be able to hire Pre-K teachers with certification. We do not support this change due to the fact that there is a predicted shortage of certified Pre-K teachers; therefore we need to continue hiring teachers who are approved to be on permit until there is no longer a shortage.

Comments for section 126-(28)-(3) Definitions

The term, Collaborative classrooms needs to be clarified. Presently we have different models all over the state. Suggestion: Collaborative classrooms shall be defined as classrooms operated by community programs with financial support from the state through LEA.

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Playgrounds in many Board of Education sites are not safe for Pre-K children. They should follow the same safety regulations for playgrounds that child care centers do. ALL children should be safe in all settings!!

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Curriculums and Assessments presently used increase quality in child care center programs and Board of Education programs.

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

- Many quality collaborations are taking place all over the state. But, there are many that are not getting adequate funding to support their program. All child care centers should receive adequate funding to support their centers.
- 2525 states Pre-K childcare programs cannot charge for Pre-K hours, therefore there needs to be a system in place that would reimburse for all Pr-K hours or allow childcare centers to charge for service.

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

ECERS is a great system for quality improvement. Continued training of reliable assessors should take place.

From Nobody <nobody@wvde.state.wv.us>

Sent Friday, June 8, 2007 11:33 am

To fibanez@wvde.state.wv.us , ctrjones@access.k12.wv.us

Subject Comment Received for Policy 2525 (2007-06-08 11:33:03)

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Comment Received for Policy 2525

#####

Name: Helen Post - Brown
Organization: WWAYC
Email: SunbeamCCC@aol.com
Title: President
Address1: 1654 Mary Lou Retton Drive
Address2:
City/State/Zip: Fairmont, WV 26554
Role:
Posted: 2007-06-08 11:33:03
Posted from IP: 24.210.123.156

Comments for section 126-(#)-1 General

We support 50% collaboration of community partners and appreciate the committee's role in continuing this rule.

Comments for section 126-(28)-(2) Guidelines

- Many quality collaborations are taking place all over the state. But, there are many that are not getting adequate funding to support their program. All child care centers should receive adequate funding to support their centers.
- The LEA shall provide funding for the community program to hire the pre-K teacher if the community programs prefer this model to the model of having a teacher placed by the LEA.
- 2525 states that by 2013 we will only be able to hire Pre-K teachers with certification. We do not support this change due to the fact that there is a predicted shortage of certified Pre-K teachers; therefore we need to continue hiring teachers who are approved to be on permit until there is no longer a shortage.
- 2525 states Pre-K childcare programs cannot charge for Pre-K hours, therefore there needs to be a system in place that would reimburse for all Pr-K hours or allow childcare centers to charge for service.

Comments for section 126-(28)-(3) Definitions

The term, Collaborative classrooms needs to be clarified. Presently we have different models all over the state. Suggestion: Collaborative classrooms shall be defined as classrooms operated by community programs with financial support from the state through LEA.

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

2525 states that by 2013 we will only be able to hire Pre-K teachers with certification. We do not support this change due to the fact that there is a predicted shortage of certified Pre-K teachers; therefore we need to continue hiring teachers who are approved to be on permit until there is no longer a shortage.

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Playgrounds in many Board of Education sites are not safe for Pre-K children. They should follow the same safety regulations for playgrounds that child care centers do. ALL children should be safe in all settings!!

Comments for section 126-(28)-(9) Standards for Preparing StudentsComments for section 126-(28)-(10) Curriculum and Assessment

Curriculums and Assessments presently used increase quality in child care center programs and Board of Education programs.

Comments for section 126-(28)-(11) Transition and ContinuityComments for section 126-(28)-(12) Inclusive EnvironmentsComments for section 126-(28)-(13) Staff Development and TrainingComments for section 126-(28)-(14) Program OversightComments for section 126-(28)-(5) Financing

Many quality collaborations are taking place all over the state. But, there are many that are not getting adequate funding to support their program. All child care centers should receive adequate funding to support their centers.

2525 states Pre-K childcare programs cannot charge for Pre-K hours, therefore there needs to be a system in place that would reimburse for all Pr-K hours or allow childcare centers to charge for service.

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

ECERS is a great system for quality improvement. Continued training of reliable assessors should take place.

From Nobody <nobody@wvde.state.wv.us>

Sent Friday, June 8, 2007 11:31 am

To fibanez@wvde.state.wv.us , ctrjones@access.k12.wv.us

Subject Comment Received for Policy 2525 (2007-06-08 11:31:23)

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Comment Received for Policy 2525

#####

Name: Suzy Mastrantoni

Organization:

Email: smastran@access.k12.wv.us

Title: prek teacher

Address1: 160 South 12th Street

Address2:

City/State/Zip: Weirton, WV 26062

Role: Teacher

Posted: 2007-06-08 11:31:23

Posted from IP: 168.216.161.192

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

There is a tremendous amount of extra planning and paper work that goes into a preschool program. If there is an up in the hours, this may decrease the quality of the programs, due to a lack of time.

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

From Nobody <nobody@wvde.state.wv.us>



Sent Friday, June 8, 2007 5:26 pm

To fibanez@wvde.state.wv.us , ctrjones@access.k12.wv.us

Subject Comment Received for Policy 2525 (2007-06-08 17:26:33)

Please save this email in a "Comments Received Online" folder. Your folder will be a backup. All comments are saved in our database. The Complete Comments Report from the database can be found here: <http://129.71.2.32/r.html?id=c111c98fb15f6cc4d70b69060b8abc65> This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 2525

#####

Name: Michele Forsythe
Organization: Holy Family Child Care & Dev. Ctr.
Email: hfccoffice@wirefire.com
Title: Director
Address1: 161 Edgington Lane
Address2:
City/State/Zip: Wheeling, WV 26003
Role: Principal
Posted: 2007-06-08 17:26:33
Posted from IP: 65.78.243.115

Comments for section 126-(#)-1 General

I am commenting on the revisions of 2525.

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

I support 50% collaboration of community partners and appreciate the committee's role in contiuing this rule. Many collaborations are taking place all over the state. Many are not receiving adequate funding to support their programs. It is vital for all child care centers to receive funding to suppport their programs to make quality programs accessible to all of WV's children. Define collaborative classrooms as ones operated by community programs with financial support from the state through LEA. This will bring clarification to the term collaborative classroom.

Comments for section 126-(28)-(7) Personnel Standards

The LEA shall provide funding for the community program to hire the pre-K teacher if the community program prefers this model to the model of having a teacher placed by the LEA. I do not support the change of hiring only PreK teachers with certification(by 2013) due to the predicted shortage of certified PreK teachers. We need to continue to hire teachers who are approved to be on permit until there is no shortage.

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

There must be a system in place that will reimburse for all preK hours or allow child care centers to charge for the service. It is not fiscally responsible for child care centers to offer care and education free of charge.

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Continue to use ECERS to improve quality and provide training for more assessors to use this good system.

ALL children should be safe in all settings. Playgrounds in many BOE sites are not safe for preK children. They should be required to follow the same safety regulations for playgrounds that centers do. This treats all parties involved in these programs fairly.

From Nobody <nobody@wvde.state.wv.us>

Sent Friday, June 8, 2007 11:01 pm

To fibanez@wvde.state.wv.us , ctrjones@access.k12.wv.us

Subject Comment Received for Policy 2525 (2007-06-08 23:01:44)

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The Complete Comments Report from the database can be found here:
<http://129.71.2.32/r.html?id=c111c98fb15f6cc4d70b69060b8abc65>
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Comment Received for Policy 2525

#####

Name: Irene Rhodes

Organization: Miss Irene's

Email: missirene@breezelink.net

Title: Owner/Director

Address1: PO Box 947

Address2:

City/State/Zip: Martinsburg , WV 25402

Role: Professional Support

Posted: 2007-06-08 23:01:44

Posted from IP: 208.10.6.183

Comments for section 126-(#)-1 General

In Berkeley County, where childcare centers are used for the Pre-K program, there needs to be more consideration toward the cost of the program running inside said Center. For example: space given to local school boards to house the program @ 35 sq ft per child which then becomes 'dead space' for the Center. Use of elec., water, sewer, breakdown of mulch, playground equipment reimbursement. And the cost of providing an Aide for free. I did this for several years and have easily calculated a financial loss to my bottom line of about \$25,000 per school year. Center Director's can not afford this. There should be ample reimbursement for Centers, with the center actually making the same profit that they would if they had regular enrollment for the same 4 year olds. I find it disconcerting that so much money was allocated for this project, and yet I personally lost money. The School Board loses -0-, the parents lose -0-, yet the center owners take the entire financial hit!

We all WANT to be supportive, but we operate on a shoestring budget as it is....we can NOT afford to simply give away our space and our Aides. I received about \$10,000.00 per school year from my local Board, and I received a "gift" of \$700. for outdoor equipment....but I paid \$15,000.00 for the Aide... so it doesn't take a rocket scientist to realize that my center lost a sizeable amount of money for trying to be the good buy and offer our support of the program. The bottom line is, Center directors can't take one more hit on their bottom line.

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

I think it's too much to ask middle class parents to provide transportation. Most of them are 2-paycheck families and most of them can not take off after 3 hours to transport their child someplace. I think the Boards should offer transportation so ALL of the children who want to be in the program can.

Comments for section 126-(28)-(5) Attendance

In the field of childcare, we scrutinize our staff ratios daily. . . somebody is out sick, somebody's car broke down...it's an ongoing issue. We swap staff from one age group to another. In this program the parents are expecting this to run like school, where most every day is the same teacher and same aide in that particular classroom. Our parents were very critical. Gimme' a break!! Plus, one day we could not provide a sub. at 8am (last minute illness) and the Pre-K program folded for the day. Geez....in the childcare field we 1) adapt, 2) adjust and 3) overcome. If we closed our doors everytime we didn't specifically meet ratios in one of classrooms for 3-hours, we would be closed everyday.

Comments for section 126-(28)-(6) Collaboration and the County Plan

My school board has been very good to me over the years and I have a wonderful working relationship with them. Yet, I still

http://access.k12.wv.us:1081/frame.html?&security=false&lang=en&charset=escaped_unic... 6/9/2007

From Nobody <nobody@wvde.state.wv.us>

Sent Saturday, June 9, 2007 9:28 am

To fibanez@wvde.state.wv.us , ctrjones@access.k12.wv.us

Subject Comment Received for Policy 2525 (2007-06-09 09:28:40)

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Comment Received for Policy 2525

#####

Name: Lisa Ray
Organization: Harrison County Schools
Email: LMRay@access.k12.wv.us
Title: Coordinator
Address1: 408 EB Saunders Way
Address2:
City/State/Zip: Clarksburg, WV 26302
Role: School System Staff
Posted: 2007-06-09 09:28:40
Posted from IP: 152.163.100.77

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Good to set the minimum and maximum number of hours the pre-k program may operate. Excellent to state that 5 year olds should go to Kindergarten instead of pre-k.

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Health check form requirement is good. My concern is that a nurse is not an expert in speech and language, so they should still have that screening on the school level.

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Caseloads should be lower than 20 when in an inclusive environment.

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Our child care partners believe asking them to reduce their rates will put a burden on them financially and they say they may pull out of the collaborative.

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

From Nobody <nobody@wvde.state.wv.us>

Sent Saturday, June 9, 2007 3:02 pm

To fibanez@wvde.state.wv.us , ctrjones@access.k12.wv.us

Subject Comment Received for Policy 2525 (2007-06-09 15:02:54)

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Comment Received for Policy 2525

#####

Name: Mary Montgomery
Organization: Berkeley Co Schools
Email: memontgo@access.k12.wv.us
Title: Special Education Coordinator
Address1: 515 W. Martin St.
Address2:
City/State/Zip: Martinsburg, WV 25401
Role: School System Staff
Posted: 2007-06-09 15:02:54
Posted from IP: 24.126.31.159

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Raising the minimum number of hours to 16 per week from 12 hours per week will be extremely difficult for large growing counties such as Berkeley - we do not have enough facilities in our area. We offer a quality program in Berkeley County and I do not want to see it sacrificed - our teachers use their time very wisely. They need time to assess the children for the program as well as attending eligibility meeting and preparing IEPs. Creative curriculum also is a time consuming endeavor which must be done as well. Please, do not take their valuable time away from them which would surely take away from the quality of the program.

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

From Nobody <nobody@wvde.state.wv.us>

Sent Saturday, June 9, 2007 10:18 am

To fibanez@wvde.state.wv.us , ctrjones@access.k12.wv.us

Subject Comment Received for Policy 2525 (2007-06-09 10:18:39)

Please save this email in a "Comments Received Online" folder. Your folder will be a backup. All comments are saved in our database. The Complete Comments Report from the database can be found here: <http://129.71.2.32/r.html?id=c111c98fb15f6cc4d70b69060b8abc65> This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 2525

#####

Name: Tamala LaBarge
Organization: Scott's Run Settlement House
Email: tamiam_65@yahoo.com
Title: Child Development Center Dir
Address1: PO Box 398
Address2:
City/State/Zip: Osage, WV 26543
Role: Community Member
Posted: 2007-06-09 10:18:39
Posted from IP: 4.249.189.165

Comments for section 126-(#)-1 General

2525 states Pre-K childcare programs cannot charge for Pre-K hours, therefore there needs to be a system in place that would reimburse for all Pr-K hours or allow childcare centers to charge for service.

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

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Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

From Nobody <nobody@wvde.state.wv.us>

Sent Saturday, June 9, 2007 10:08 am

To fibanez@wvde.state.wv.us , ctrjones@access.k12.wv.us

Subject Comment Received for Policy 2525 (2007-06-09 10:08:25)

Please save this email in a "Comments Received Online" folder. Your folder will be a backup. All comments are saved in our database. The Complete Comments Report from the database can be found here: http://129.71.2.32/r.html?id=c111c98fb15f6cc4d70b69060b8abc65 This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 2525

#####

Name: Linda
Organization: Bunce
Email: bandvs@gmail.com
Title: Ms.
Address1: PO Box 608
Address2:
City/State/Zip: Cool Ridge, WV 25825
Role: Teacher
Posted: 2007-06-09 10:08:25
Posted from IP: 75.108.175.5

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Creative Curriculum is required by most counties, and policy requires face to face conferences with parents at least 2 times per year. However at current caseloads, 40, or even at the proposed maximum caseload of 30, it will not be possible to schedule this many conferences in the one non-instructional day per checkpoint given by Raleigh county. As of this coming year, our county no longer includes a home visiting component. It would be helpful if the state could mandate that enough time be given to at least allow face-to-face conferences for the caseload. Reasonably, one cannot meet with more than 10 families per day. So requiring at least 3 non-instructional days per checkpoint would make it possible to actually comply with this mandate, and it's purpose. The school system in general does not get the value of getting to know families-by defining a required and reasonable time to meet with families, you will be ensuring that the family component can still happen.

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

An ongoing issue for PSN teachers is the necessity of leaving the classroom under the supervision of one adult only during IEP meetings. Up till now, it was possible to schedule most of these meetings on Fridays. Now that we have gone to 5 instructional days per week, at least one teacher will have to leave the classroom during these meetings. Generally other school staff familiar with the childreenn are also involved in IEP meetings (such as speech therapists.) This is such a potentially a dangerous situation, given the age and behavioral/health issues of our students. We need protection, as in

mandating that IEPs be held on instructional days, (even if preschool must have more noninstructional days than the rest of the school). There are circumstances that make preschool different, especially the inclusive classrooms. Many of the health and safety requirements are ignored by the school system, or just not possible: easy access to adequate toileting facilities, appropriate amount of space, safe and appropriate playgrounds--my own school will not be able to comply with any of these requirements, especially as the number of preschoolers served increases.

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

To: Cathy Jones, Office of Special Programs, Extended and Early Learning

From: Katherine Perrine, Preschool Teacher Glade Elementary

Comments on Policy 2525

Section 3.12 – Eligible Child – It is still unclear to me after reading the policy whether a 5 year old can attend Preschool. If they can attend, must they have an IEP? I feel that a 5 year old should be able to attend Preschool if the “team” feels it is in the best interest of the child. I have had children, in my 18 years of teaching preschool, that were not “ready” to go to Kindergarten because of immaturity. They just needed another year to mature. Most of the children that we have kept an extra year, or that Kindergarten has referred to us, have been successful in their Kindergarten year. This year a doctor requested that a Kindergarten child be sent to Preschool instead of Kindergarten because the child was immature and not able to cope in Kindergarten. Will this be possible under the new regulations?

Section 3.148 – Program availability – Currently I have 2 half day sessions that are about 3 hours and 15 minutes long. We have class 4 days a week. On the 5th day we do one of the following: Planning, collaboration, conferences, home visits, continuing education, or putting the Creative Curriculum assessments online. Many parents in our area do not want to send their children to a full day program. If we go to a full day program, where will the other half of the children in my program go? A board of education employee must have 30 minutes planning and 30 minutes duty free lunch, I can see no way we can obtain 16 hours per week. I feel that my children in the half-day program are very successful. We were in the Early Promise Grant and my children performed very well, so I think we should still be given the option of a half-day program. I would like to see the number of hours to remain at 12.

Section 8.18 – It says, “At no time should pre-k children be without adult supervision in the bathroom.” Do you mean that the teacher or aid has to be in the single toilet bathroom with the child? If we must be in the bathroom with the child, I would like to say that many children have “privacy” issues and I do not feel comfortable with standing in a small bathroom, just the

child and I. Instead, I hope that this just means that we have to be available to help the child if needed, but not be "in the bathroom".

Thank you for letting me comment on the policy. If you have any questions, my e-mail address is kcvpg@citlink.net or my phone number is 304-226-5854.

Comments to Proposed WVBE Policy 2525 – Kay Tilton

Support:

3.18 The increase in program availability should improve school readiness. Two day programs, in particular, may offer limited improvements when you consider length of time between classes when absences or holidays occur.

6.3 The additions including in this section should improve collaboration. However, see 6.32 below.

6.7.1 It is extremely important to maintain the requirement for 50% of classrooms to be provided through contractual agreements with community partners.

6.10.2. The addition of this requirement will insure that all WV Pre-k community programs maintain compliance with the same health and safety requirements. This not only assures safe care for children, it levels the playing field for the participation of all community partners.

7.4., 7.5 & 7.6. The permanent and temporary authorizations for teachers in community programs offer an excellent compromise for obtaining very qualified teachers in community programs without requiring BA degrees. It should remain in policy until such time as adequate supports are in place to produce the number of BAs needed in early childhood and to pay the community programs enough to retain them.

Concerns and Suggested Changes:

3.5. The definition of collaborative setting does not adequately address the intent of law or policy. Suggested wording is: "*Collaborative setting* means a classroom of WV Pre-k children operated by a community program with financial support from the state through LEA., or a classroom operated jointly by a community program and the LEA.

6.2 & 6.4 These sections do not correctly portray the process. The committee makes recommendations to the Secretary and the list approved by the Secretary is provided to WVBE, The committee does not actually provide a different list of recommendations to WVBE. This policy does not address what happens if the members of the review committee do not agree, or the State Department of Education disagrees with WVDHHR. Hopefully, the agencies will work it out in advance, so it may not be necessary.

6.3.2. Add the following statement: "The LEA shall allow the community program to hire the pre-K teacher if the community program prefers this model of collaboration over the model of having a teacher placed by the LEA.

6.10.1 Change Day Care to Child Care.

7.7 The requirement of a BA degree for new staff hired after 2012 in community programs is burdensome for child care centers unless adequate funding is provided for them to pay salaries and provide benefits comparable to those of public school teachers. Recent research and current thinking also questions the necessity of a BA if other criteria are met, such as an AA with specific early childhood professional development.

8.1 Change Day Care to Child Care.

10.4.1. In tribute to our colleague, Ann Nutt, I would like to propose retaining all specific information related to curriculum. While it may be duplicative with other documents, it never hurts for us to review what is really important for the children in a pre-k program.

15. Program oversight is as essential to improving and maintaining quality as teacher qualifications, professional development, and curriculum standards. A regular monitoring system is needed.

16.2 Please add: The ECERS-R shall not be used as a monitoring tool for determining whether to continue or discontinue a contract for a community partner.

Comments on WV Policy 2525

My name is Teresa Clark. I have been a pre-k teacher in Webster County's school system for 20 years. I have a masters degree in education and a specialization in early childhood.

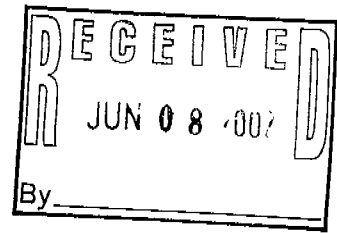
2.1- I question The only evaluation of program success being the Early Childhood Environmental Rating Scale. This seems to me to be a rating of the child's environment and I know that is an important part of a quality program, but not a fair evaluation of program quality of success. It could be one part of a quality program. I would like to see the Ellco also used to evaluate programs. This also gives a good indication of the quality of literacy activities in the program and language development being encouraged. Many children in our state come from homes where language development and book reading are not encouraged. I feel this is an important part of a quality program.

3.26- I do not think someone who has a 2 year degree of any type can be as effective as a trained teacher with at least a 4 year degree. I take offense to this as a trained teacher. A four year degree in early childhood should be the minimum you would settle for. In no other classroom in the state would this be allowed or tolerated. Are young children less important?

21—The idea that a child should be allowed to nap when they feel like it is silly. No classroom can have children napping all day long if they feel like it.

22- Is gross motor development time and outdoor time considered the same? In WV weather does not allow children to go outside usually from November to April. Can time scheduled in a gym meet this criteria?

Last I would like to comment on the restriction of 5 years olds not being allowed to enroll in WV pre-K. First this does not align with WV law which allows a parent to not enroll their child in Kindergarten until age 6. It also goes against parents being allowed to make the decision if their child is ready or not to participate in a group program. This seems to be punishing children for not fitting the mold of what a pre-k child should be.



126CSR28

POLICY 2525: West Virginia's Universal Access to a Quality Early Education System

COMMENT PERIOD ENDS: June 11, 2007

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2525: West Virginia's Universal Access to a Quality Early Education System. Additional sheets may be attached, if necessary.

Name: Jennifer Potter Organization: Parent

Title: Parent

Street Address: 371 Berkshire Dr.

City: Falling Waters State: WV Zip: 25419

Please check the box below that best describes your role.

- School System Superintendent School System Staff Parent/Family
- Principal Teacher Business/Industry
- Professional Support Staff Service Personnel Community Member

COMMENTS/SUGGESTIONS
<p>' 126-(#)-1. General. I think 12 hours per week is great. More than that, per day, is hard on the student that is preparing for school. 12 hours per week has been just right. not too overwhelming</p>
<p>' 126-(28)-(2). Guidelines.</p>

126CSR28

' 126-(28)-(3). Definitions.

' 126-(28)-(4). Parent/Guardian Involvement and Family Support.

' 126-(28)-(5). Attendance.

' 126-(28)-(6). Collaboration and the County Plan.

' 126-(28)-(7). Personnel Standards

' 126-(28)-(8). Health and Safety Requirements

I feel that 20 students in class is the best fit. Kids this age have a hard time focusing and adding more students to one classroom could be problematic, distracting and harder to manage, regardless of how many teachers, assistants and aids you have.

' 126-(28)-(9). Standards for Preparing Students.

126CSR28

' 126-(28)-(5). Financing.

' 126-(28)-(16). Program Evaluation for Quality Improvement.

Please direct all comments to:

Cathy R. Jones, Ed.D
Office of Special Programs, Extended and Early Learning
West Virginia Department of Education
Capitol Building 6, Room 304
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-3741



GREENBRIER HEAD START / PRE-K
 Terri Wontrobski, Director

RECEIVED
 JUN 12 2007
 By _____

✓
 [Handwritten initials]

Greenbrier County Schools
 202 Chestnut Street
 Lewisburg, WV 24901
 Telephone: 304-647-6470
 Fax: 304-647-6490

Date: June 11, 2007

No. of Pages: 6

To: Cathy Jones

Fax: (304) 558-1613

From: Terri Wontrobski, Director

Pam Massey, Secretary

Comments:

Cathy:

Attached are comments to 2525. I have also attached section 1306.3 and 1306.34 from
the Head Start Performance Standard regarding the combination program. Thanks.

Terri Wontrobski

NOTE: If any of these pages are illegible or if you do not receive the same number of pages as stated above,
 please contact us immediately.

COMMENTS

126-28-14 Minimum Program Availability

Minimum Program availability is being suggested to change to a minimum of 16 hours/week. This suggested change would eliminate the possibility of the Head Start combination program option. Part 1306.34 of the Head Start Performance Standards lists the combination program option, the number of class sessions and the number of home visits. Greenbrier County presently has 69 center days and 16 home visits a year. This follows the Head Start Performance Standards. Since 2525 and the Head Start Performance Standard are purported to align, consideration needs to be given in 2525 for the combination option.

Wording for 2525 could be a Head Start combination model that follows the Head Start Performance Standard that has been approved by the Head Start regional office will be accepted.

126-28-14 Minimum Program Availability

A minimum of 108 instructional days will prohibit programs from having initial home visits and home visits scheduled into their calendar during the year. A recommended number would be 102 instructional days to allow for the home visits.

126-28-14 Minimum Program Availability

A minimum of 16 hours per week would require program to have a minimum of three days a week or five half days. In order to have a full time teacher with these hours, programs will have to choose between double sessions of three hours and fifteen minutes a day (2 per day) or a four day a week program. That may well force school districts to choose a four day model while child care would choose the half day model and get child care funding for the remainder of the day. This allows for no flexibility for programs. Fourteen hours a week minimum would permit flexibility of a two day program.

126.28.14 Minimum Program Availability

Large rural counties that are providing transportation to children have children with a very long day due to early bus runs and long bus runs. This travel time is very hard four or five days a week for a four year old. Greenbrier Head Start did a survey with their families and 85% preferred two or three days with the home visit two times a month. Distances on the bus and gas costs for the distance (if parents drove) are major obstacles for rural counties.

126.28 Minimum Program Availability

School districts in WV have set their budgets, plans and timetables for full compliance with 2525 for 2012-2013. The change in the hours per day from 12 to 16 hours will require school districts to now have to re-figure their plan and project additional costs to change from 2 days/ week to 4 days/week. This is double the number of staff and classroom. This will all need to be done by 2012. Further, districts with increasing population will now need to provide for the additional classrooms. No funding is provided in 2525 for new construction for additional classroom.

PART 1306 — HEAD START STAFFING REQUIREMENTS AND PROGRAM OPTIONS

Subpart A — General

1306.1 Purpose and scope.

This Part sets forth requirements for Early Head Start and Head Start program staffing and program options that all Early Head Start and Head Start grantee and delegate agencies, with the exception of Parent Child Center programs, must meet. The exception for Parent Child Centers is for fiscal years 1995, 1996, and 1997 as consistent with section 645A(e)(2) of the Head Start Act, as amended. These requirements, including those pertaining to staffing patterns, the choice of the program options to be implemented and the acceptable ranges in the implementation of those options, have been developed to help maintain and improve the quality of Early Head Start and Head Start and to help promote lasting benefits to the children and families being served. These requirements are to be used in conjunction with the Head Start Program Performance Standards at 45 CFR 1304, as applicable.

1306.2 Effective dates.

(a) Except as provided in paragraph (b) of this section, Head Start grantees funded or re-funded after June 7, 1993, must comply with these requirements by such times in their grant cycles as new groups of children begin receiving services. This does not preclude grantees from voluntarily coming into compliance with these regulations prior to the effective date.

(b) With respect to the requirements of Sec. 1306.32(b)(2), grantees that are currently operating classes in double session center-based options for less than three and a half hours per day, but for at least three hours per day, may continue to do so until September 1, 1995, at which time they must comply with the three and one-half hour minimum class time requirement.

1306.3 Definitions.

(a) *Center-based program option* means Head Start services provided to children primarily in classroom settings.

(b) *Combination program option* means Head Start services provided to children in both a center setting and through intensive work with the child's parents and family at home.

(c) *Days of operation* means the planned days during which children will be receiving direct Head Start component services in a classroom, on a field trip or on trips for health-related activities, in group socialization or when parents are receiving a home visit.

(d) *Double session variation* means a variation of the center-based program option that operates with one teacher who works with one group of children in a morning session and a different group of children in an afternoon session.

(e) *Full day variation* means a variation of the center-based program option in which program operations continue for longer than six hours per day.

(f) *Group socialization activities* means the sessions in which children and parents enrolled in the home-based or combination program option interact with other home-based or combination children and parents in a Head Start classroom, community facility, home, or on a field trip.

(g) *Head Start class* means a group of children supervised and taught by two paid staff members (a teacher and a teacher aide or two teachers) and, where possible, a volunteer.

(h) *Head Start parent* means a Head Start child's mother or father, other family member who is a primary caregiver, foster parent, guardian or the person with whom the child has been placed for purposes of adoption pending a final adoption decree.

1306.34 Combination program option.

(a) *Combination program option requirements:*

(1) Grantees implementing a combination program option must provide class sessions and home visits that result in an amount of contact with children and families that is, at a minimum, equivalent to the services provided through the center-based program option or the home-based program option.

(2) Acceptable combinations of minimum number of class sessions and corresponding number of home visits are shown below. Combination programs must provide these services over a period of 8 to 12 months.

Number of class sessions	Number of home visits
96	8
92-95	9
88-91	10
84-87	11
80-83	12
76-79	13
72-75	14
68-71	15
64-67	16
60-63	17
56-59	18
52-55	19
48-51	20
44-47	21
40-43	22
36-39	23
32-35	24

(3) The following are examples of various configurations that are possible for a program that operates for 32 weeks:

- A program operating classes three days a week and providing one home visit a month (96 classes and 8 home visits a year);
- A program operating classes two days a week and providing two home visits a month (64 classes and 16 home visits a year);

- A program operating classes one day a week and providing three home visits a month (32 classes and 24 home visits a year).

(4) Grantees operating the combination program option must make a reasonable estimate of the number of days during a year that centers may be closed due to problems such as inclement weather or illness, based on their experience in previous years. Grantees must make provisions in their budgets and program plans to operate make-up classes up to the estimated number, and provide these classes, when necessary, to prevent the number of days of classes from falling below the number required by paragraph (a)(2) of this section. Grantees must make up planned home visits that were canceled by the program or by the program staff if this is necessary to meet the minimums required by paragraph (a)(2) of this section. Medical or social service appointments may not replace home visits.

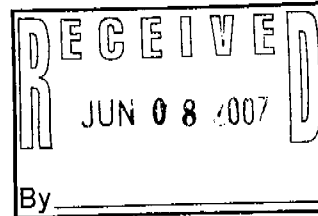
(b) *Requirements for class sessions:* (1) Grantees implementing the combination program option must comply with the class size requirements contained in Sec. 1306.32(a).

(2) The provisions of the following sections apply to grantees operating the combination program option: Sec. 1306.32(b) (2), (5), (6), (7) and (9).

(3) If a grantee operates a double session or a full day variation, it must meet the provisions concerning double-sessions contained in Sec. 1306.32(c)(1) and (3) and the provisions for the center-based program option's full day variation found in Sec. 1306.32(d).

(c) *Requirements for home visits:* (1) Home visits must last for a minimum of 1 and 1/2 hours each.

(2) The provisions of the following section, concerning the home-based program option, must be adhered to by grantees implementing the combination program option: Sec. 1306.33(a) (4) and (5); and Sec. 1306.33(b).



126CSR28

POLICY 2525: West Virginia's Universal Access to a Quality Early Education System

COMMENT PERIOD ENDS: June 11, 2007

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2525: West Virginia's Universal Access to a Quality Early Education System. Additional sheets may be attached, if necessary.

Name: Rebecca Cline Organization: Parent/BC Pre-K Comm. Mbr.

Title: Parent / Core Partner - Berkeley Co. Pre-K Comm.

Street Address: 390 Camelot Blvd.

City: Falling Waters State: WV Zip: 25419

Please check the box below that best describes your role.

- School System Superintendent
- School System Staff
- Parent/Family
- Principal
- Teacher
- Business/Industry
- Professional Support Staff
- Service Personnel
- Community Member

COMMENTS/SUGGESTIONS

'126-(#)-1. General. - I think keeping Pre-K on the same schedule (half day 4 days per week) is ideal. It is a long day for a 4-year-old, but not long enough that they start having behavior issues. My son was tired after school, but always excited and happy to go to school. Half day is the perfect stepping stone for full-day kindergarten. For children that need full-day care, wraparound care is offered through

'126-(28)-(2). Guidelines. The day care locations, and I think that is an incentive for the day care providers to participate in the BC Pre-K program, as they may be getting additional paying customers that they might not have. Also for parents trying to get their older children on and off busses, a half day schedule is more convenient; as many parents drive their kids to Pre-K.

126CSR28

' 126-(28)-(3). Definitions.

' 126-(28)-(4). Parent/Guardian Involvement and Family Support.

' 126-(28)-(5). Attendance.

' 126-(28)-(6). Collaboration and the County Plan.

' 126-(28)-(7). Personnel Standards

' 126-(28)-(8). Health and Safety Requirements *I feel younger children benefit the most from smaller sized classes. If the number of students is increased to 30 I think it will be difficult for the kids to pay attention, and if they are full day classes, difficult for the teachers to handle. More of our Berkeley Co. 4-year-olds can benefit from the current Pre-K schedule - 10 more kids per facility.*

' 126-(28)-(9). Standards for Preparing Students.

126CSR28

' **126-(28)-(10). Curriculum and Assessment.**

' **126-(28)-(11). Transition and Continuity**

' **126-(28)-(12). Inclusive Environments.**

' **126-(28)-(13). Staff Development and Training.**

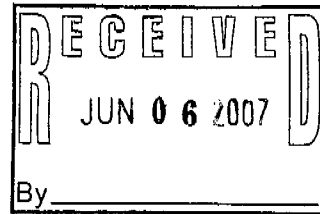
' **126-(28)-(14). Program Oversight.**

126CSR28

' 126-(28)-(5). Financing.
' 126-(28)-(16). Program Evaluation for Quality Improvement.

Please direct all comments to:

Cathy R. Jones, Ed.D
Office of Special Programs, Extended and Early Learning
West Virginia Department of Education
Capitol Building 6, Room 304
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-3741



126CSR28

POLICY 2525: West Virginia's Universal Access to a Quality Early Education System

COMMENT PERIOD ENDS: June 11, 2007

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2525: West Virginia's Universal Access to a Quality Early Education System. Additional sheets may be attached, if necessary.

Name: Manny P. Arvon Organization: Berkeley County Schools

Title: Superintendent

Street Address: 401 South Queen Street

City: Martinsburg State: WV Zip: 25401

Please check the box below that best describes your role.

- School System Superintendent
- School System Staff
- Parent/Family
- Principal
- Teacher
- Business/Industry
- Professional Support Staff
- Service Personnel
- Community Member

COMMENTS/SUGGESTIONS
'126-(#)-1. General.
'126-(28)-(2). Guidelines.

' 126-(28)-(3). Definitions.

3.18

The increase in the minimum number of hours per week required for WV Universal Pre-K from 12 to 16 is of great concern. Our primary concerns are that the increase in hours will inhibit our ability to retain highly qualified staff members and decrease the quality of our district's programs.

Because Berkeley County has limited space, the majority of our classrooms are partial day programs. This allows us to serve the largest number of eligible four-year-olds in order to make progress towards full implementation in 2012. Partial day classrooms involve serving two groups of 20 children in three-hour segments while still providing for drop off and pick up times, a duty-free lunch for the teacher, and set up and clean up times. For the past few years, Berkeley County has operated a number of partial day programs on a Tuesday through Friday schedule.

The proposed increase in hours affects the amount of time that teachers have for planning, meeting with parents, entering CreativeCurriculum.net data (a minimum of 6,000 entries were required this year for teachers who have general education half-day classes with a total of 40 students), collaboration with other Pre-K teachers, participation in eligibility and IEP meetings, developmental testing of children referred for special education services, conducting screenings, and participating in required training related to Pre-K. The benefit of a few additional contact hours will not exceed the benefit of well-planned, intentional instructional design and quality interactions with parents and colleagues. This is an example of a time when quality outweighs quantity.

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' 126-(28)-(4). Parent/Guardian Involvement and Family Support.

' 126-(28)-(5). Attendance.

126CSR28

' 126-(28)-(6). Collaboration and the County Plan.

' 126-(28)-(7). Personnel Standards

' 126-(28)-(8). Health and Safety Requirements

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126CSR28

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' 126-(28)-(11). Transition and Continuity

' 126-(28)-(12). Inclusive Environments.

' 126-(28)-(13). Staff Development and Training.

' 126-(28)-(14). Program Oversight.

126CSR28

' 126-(28)-(5). **Financing.**

' 126-(28)-(16). **Program Evaluation for Quality Improvement.**

Please direct all comments to:

Cathy R. Jones, Ed.D
Office of Special Programs, Extended and Early Learning
West Virginia Department of Education
Capitol Building 6, Room 304
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-3741

126CSR28

✓ WV

POLICY 2525: West Virginia's Universal Access to a Quality Early Education System

COMMENT PERIOD ENDS: June 11, 2007

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2525: West Virginia's Universal Access to a Quality Early Education System. Additional sheets may be attached, if necessary.

Name: Frank Aliveto Organization: Berkeley County Schools

Title: Deputy Superintendent

Street Address: 401 South Queen Street

City: Martinsburg State: WV Zip: 25401

Please check the box below that best describes your role.

- | | | |
|--|--|--|
| <input type="checkbox"/> School System Superintendent | <input type="checkbox"/> School System Staff | <input type="checkbox"/> Parent/Family |
| <input type="checkbox"/> Principal | <input type="checkbox"/> Teacher | <input type="checkbox"/> Business/Industry |
| <input checked="" type="checkbox"/> Professional Support Staff | <input type="checkbox"/> Service Personnel | <input type="checkbox"/> Community Member |

COMMENTS/SUGGESTIONS
'126-(#)-1. General.
'126-(28)-(2). Guidelines.

' 126-(28)-(3). Definitions.

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126CSR28

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126CSR28

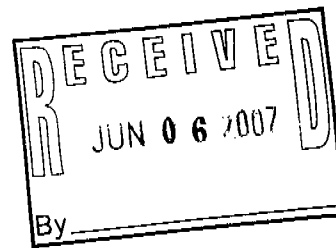
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126CSR28



POLICY 2525: West Virginia's Universal Access to a Quality Early Education System

COMMENT PERIOD ENDS: June 11, 2007

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Title: Assistant Superintendent

Street Address: 401 South Queen Street

City: Martinsburg State: WV Zip: 25401

Please check the box below that best describes your role.

- School System Superintendent
- School System Staff
- Parent/Family
- Principal
- Teacher
- Business/Industry
- Professional Support Staff
- Service Personnel
- Community Member

COMMENTS/SUGGESTIONS
'126-(#)-1. General.
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126CSR28

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126CSR28

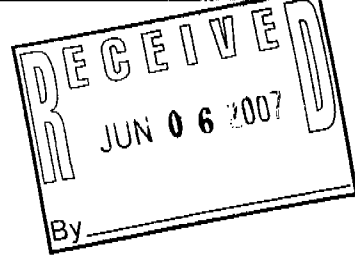
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126CSR28



POLICY 2525: West Virginia's Universal Access to a Quality Early Education System

COMMENT PERIOD ENDS: June 11, 2007

COMMENT RESPONSE FORM

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Name: Jim Welton Organization: Berkeley County Schools

Title: Citizen

Street Address: 401 South Queen Street

City: Martinsburg State: WV Zip: 25401

Please check the box below that best describes your role.

- School System Superintendent
- School System Staff
- Parent/Family
- Principal
- Teacher
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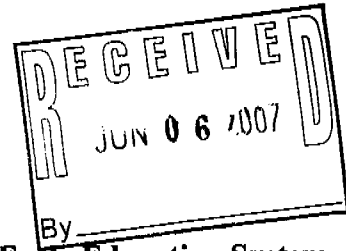
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Please direct all comments to:

Cathy R. Jones, Ed.D
Office of Special Programs, Extended and Early Learning
West Virginia Department of Education
Capitol Building 6, Room 304
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-3741

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POLICY 2525: West Virginia's Universal Access to a Quality Early Education System

COMMENT PERIOD ENDS: June 11, 2007

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2525: West Virginia's Universal Access to a Quality Early Education System. Additional sheets may be attached, if necessary.

Name: David Kenney Organization: Berkeley County Schools

Title: Director, Research and Technology

Street Address: 401 South Queen Street

City: Martinsburg State: WV Zip: 25401

Please check the box below that best describes your role.

- School System Superintendent
- School System Staff
- Parent/Family
- Principal
- Teacher
- Business/Industry
- Professional Support Staff
- Service Personnel
- Community Member

COMMENTS/SUGGESTIONS
<p>'126-(#)-1. General.</p>
<p>'126-(28)-(2). Guidelines.</p>

' 126-(28)-(3). Definitions.

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126CSR28

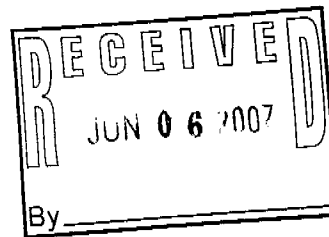
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COMMENT PERIOD ENDS: June 11, 2007

COMMENT RESPONSE FORM

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Name: Chris Edwards Organization: Berkeley County Schools

Title: Director, Federal Programs

Street Address: 401 South Queen Street

City: Martinsburg State: WV Zip: 25401

Please check the box below that best describes your role.

- School System Superintendent
- School System Staff
- Parent/Family
- Principal
- Teacher
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COMMENTS/SUGGESTIONS
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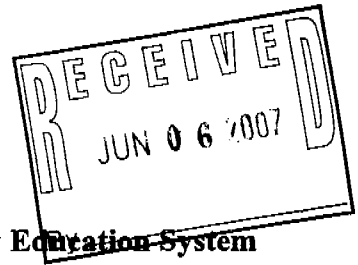
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126CSR28



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COMMENT PERIOD ENDS: June 11, 2007

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Title: Director of Pupil Services

Street Address: 401 South Queen Street

City: Martinsburg State: WV Zip: 25401

Please check the box below that best describes your role.

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- School System Staff
- Parent/Family
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- Teacher
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126CSR28

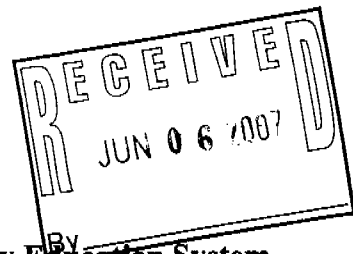
' 126-(28)-(5). Financing.

' 126-(28)-(16). Program Evaluation for Quality Improvement.

Please direct all comments to:

Cathy R. Jones, Ed.D
Office of Special Programs, Extended and Early Learning
West Virginia Department of Education
Capitol Building 6, Room 304
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-3741

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POLICY 2525: West Virginia's Universal Access to a Quality Early Education System

COMMENT PERIOD ENDS: June 11, 2007

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2525: West Virginia's Universal Access to a Quality Early Education System. Additional sheets may be attached, if necessary.

Name: Ken Marsteller Organization: Berkeley County Schools

Title: Business Manager

Street Address: 401 South Queen Street

City: Martinsburg State: WV Zip: 25401

Please check the box below that best describes your role.

- School System Superintendent
- School System Staff
- Parent/Family
- Principal
- Teacher
- Business/Industry
- Professional Support Staff
- Service Personnel
- Community Member

COMMENTS/SUGGESTIONS
<p>'126-(#)-1. General.</p>
<p>'126-(28)-(2). Guidelines.</p>

' 126-(28)-(3). Definitions.

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126CSR28

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' 126-(28)-(5). Attendance.

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126CSR28

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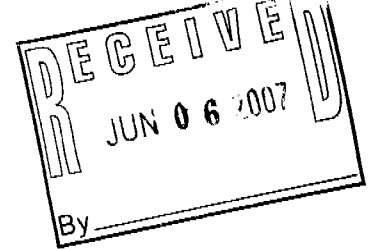
126CSR28

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POLICY 2525: West Virginia's Universal Access to a Quality Early Education System

COMMENT PERIOD ENDS: June 11, 2007

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2525: West Virginia's Universal Access to a Quality Early Education System. Additional sheets may be attached, if necessary.

Name: Donna G. Miller Organization: Berkeley County Schools

Title: Director of Instruction

Street Address: 401 South Queen Street

City: Martinsburg State: WV Zip: 25401

Please check the box below that best describes your role.

- School System Superintendent School System Staff Parent/Family
- Principal Teacher Business/Industry
- Professional Support Staff Service Personnel Community Member

COMMENTS/SUGGESTIONS
' 126-(#)-1. General.
' 126-(28)-(2). Guidelines.

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126CSR28

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126CSR28

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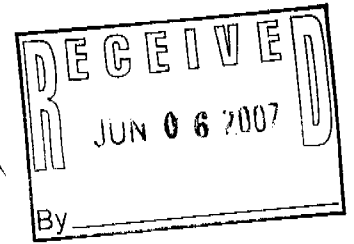
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POLICY 2525: West Virginia's Universal Access to a Quality Early Education System

COMMENT PERIOD ENDS: June 11, 2007

COMMENT RESPONSE FORM

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Name: Laura Sutton Organization: Berkeley County Schools

Title: Director of Legal Services

Street Address: 401 South Queen Street

City: Martinsburg State: WV Zip: 25401

Please check the box below that best describes your role.

- School System Superintendent School System Staff Parent/Family
- Principal Teacher Business/Industry
- Professional Support Staff Service Personnel Community Member

COMMENTS/SUGGESTIONS
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E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-3741

Comment Received for Policy 2525 (2007-05-15 130146)

From: Nobody [nobody@wvde.state.wv.us]
Sent: Tuesday, May 15, 2007 1:02 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-05-15 13:01:46)

Please save this email in a "Comments Received Online" folder. Your folder will be a backup. All comments are saved in our database. The Complete Comments Report from the database can be found here:
<http://129.71.2.32/r.html?id=c111c98fb15f6cc4d70b69060b8abc65>
This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 2525

#####

Name: G. Ronald Brown
Organization: Office of Sp. Ed., Berkeley
Email: grbrown@access.k12.wv.us
Title: Director
Address1: Special Education
Address2: Berkeley County
City/State/Zip: Martinsburg, WV 22611
Role: School System Staff
Posted: 2007-05-15 13:01:46
Posted from IP: 168.216.159.45

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

126-28-3. Opposed to increased time. Programs are growing and we would not be able to accommodate this increase in time and continue to grow the program. This little time added would not be sufficient to enhance the program when compared to the issues created by this change. Thanks

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

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Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Comment Received for Policy 2525 (2007-05-15 143758)
From: Nobody [nobody@wvde.state.wv.us]
Sent: Tuesday, May 15, 2007 2:38 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-05-15 14:37:58)

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Comment Received for Policy 2525

Name: Melissa Anderson
Organization: Lewis County BOE
Email: mcanders@access.k12.wv.us
Title: PK Teacher
Address1: RT.2 Box 196V
Address2:
City/State/Zip: Jane Lew, WV 26378
Role: Teacher
Posted: 2007-05-15 14:37:58
Posted from IP: 168.216.192.42

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

2.1.11. Preferred class size 12-15 students with one certified teacher and one teacher's aide. Allows staff to meet ALL needs of ALL students (Example: social, emotional, and educational needs)

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Comment Received for Policy 2525 (2007-05-15 143758)

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

From: Rachel Ringler [rsjsringler@msn.com]

Sent: Tuesday, May 15, 2007 3:55 PM

To: ctrjones@access.k12.wv.us

Dear State Board Members,

I am writing you in regard to Policy 2525 and the extension of the minimum hours required for Pre-K classes from 12 to 16. I am a Preschool Special Needs educator, my responsibilities include entering anecdotal notes for the newly implemented Creative Curriculum (cc.net) that is at least 6,000 entries; and then I have Individual Education Programs (IEPs) for children entering the program. This process includes formal screenings of individuals, writing an eligibility letter of notification, writing an IEP and meeting with a team to go over the IEP and rights of the child, this is at least a four hour process. Then of course there is lesson planning which I barely have enough time for now. I want to give the children the best education I can possibly give them and if we add more hours not only will it impede my planning, but it will trickling down not only to the children in my classroom but my children at my home as well. And my children deserve a parent as much as the students deserve a teacher. I already do most of the creative curriculum entries at my home as well as the majority of my lesson planning as well, (I actually try to improve my teaching skills not just use the same information year after year.) I know the main concern is the children in the classroom, children from three to five years in age have an attention span from 5 to 15 minutes if we are lucky, by expanding the days and time you are asking them to sit beyond what is age appropriate, this will increase behavioral issues and we really do not need to add behavioral problems to the programs if unnecessary.

Then there are the finances; if you plan on implementing this have you thought about the large sum of money that will be needed to fund coverage so teachers get at least a half an hour for lunch and another half an hour of duty free planning everyday! As it stands now the teachers in my building barely get twenty minutes for lunch, but have we complained, no because our program is working. This doesn't even begin to touch the cost of finding someone to cover the class when screenings, eligibility, and meetings for new IEPs are done, as well as IEP transitioning to Kindergarten and annual IEPs. Who is suffering then.... The children! That means a substitute teacher will be in the classroom frequently throughout the school year. Then we would see a decline in the outcomes achieved. Then add in the time for our extended learning which requires a minimum of 18 hours a school year. All of these things have been done on the one day students do not attend and it is a money saver in comparison to what you are proposing.

Why fix something that is not broken? Please rethink your plans. We work in the classrooms, and we too want to see the children succeed, they are like our own! Listen to our voices and concerns and do not take them lightly, if you do the children are the only ones who will suffer AND THAT IS NOT TAKING THEIR BEST INTEREST TO HEART or PUTTING THE CHILD FIRST. Substitutes are often difficult to find, and if you are luckily enough to find one it will not be the same substitute every time either; and children with special needs have even more difficulty with the transitioning of strange people, this often causes outburst and undesirable behaviors to say the least. Remember, this is just for myself multiply it times the number of teachers and then aides as well.

Transportation is also a concern; with gas prices going up, it is often more difficult for parents to transport their child, and it is a big expense. We want the children to attend everyday so they do not miss learning opportunities. I know you are saying this doesn't affect special needs classes but it does for our peers. Our peer program is an integral part of the success of our students with disabilities. (In this aspect we need to think of the families, and children.)

Finally, the building our school uses has transitional school upon teacher dismissal. If we increase our time, we loose our building; that is 7 classrooms, 14 classes and a minimum of 180 students. WOW! Is it worth their education? Even if we had teacher planning at the end of the day (carrying over into

transitional school) we are looking at starting school at 7:30 and that means children getting on the bus at 6:30 at what time would they get up? Again, you are looking at behavioral issues.

You want teachers who are well rested, teachers who have opportunities to collect **correct** data, teachers who have lessons that meet standards and are well thought out; **you want teachers who are able to give their best to the children to produce the best and highest outcomes.** You want **children to succeed** and in order to do this we must keep everything on age appropriate levels, we do not want to over work them, or create undesirable behaviors we want to keep the success going and in order to do so we need to leave the hours at a minimum of 12 hours. **12 hours is what is best and age appropriate for the best possible outcomes for our children, keep the teacher in the classroom not a substitute.**

Thank you for allowing me to express my concerns. It is my hope and my belief that the best interest of the children would be to leave the program that works so well, alone. If there are problems elsewhere maybe you need to consider having them visit facilities like ours as to run more efficiently.

Sincerely,

Rachel L. Ringler
Pre-K Special Needs Educator
Berkeley County Pre-K Planning Committee

Comment Received for Policy 2525 (2007-05-15 172944)
From: Nobody [nobody@wvde.state.wv.us]
Sent: Tuesday, May 15, 2007 5:30 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-05-15 17:29:44)

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Comment Received for Policy 2525
#####

Name: Beverley A. Kane
Organization:
Email: bhillkane@yahoo.com
Title: Teacher's aide
Address1: 9240 winchester Ave.
Address2:
City/State/zip: Bunker Hill, w.Va. 25413
Role: Service Personnel
Posted: 2007-05-15 17:29:44
Posted from IP: 70.106.46.173

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

As a teacher's aide at Pikeside Special needs Pre-K, I have some concerns about the extended hours at the school. The children go 4 days, with AM and PM classes. It seems like this enough hours for them. Some are tired when they come and tired when they leave.
Mondays are the teachers' and aides' planning day. We have no laminator and the children's projects are planned and sometimes need lamination, which has to be done in Martinsburg. It's an extra trip to town, but with a day to do it, it really helps.

I understand Jefferson County has one class on Mondays and one class on Fridays, giving the teachers and aides a half-day each day to do planning.
With all the IEP meetings and Creative Curriculum requirements that the teachers have to enter in the computer, it doesn't seem fair to take away their time at school and add extra hours to do their forms on each child.

Each of us have our own family to consider, and want to be with in the evenings. Could you please find a way to have planning time without putting extended workhours on our workdays?

Thank you.
Sincerely,
Beverley A. Kane

Comment Received for Policy 2525 (2007-05-16 122948)

From: Nobody [nobody@wvde.state.wv.us]
Sent: Wednesday, May 16, 2007 12:30 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-05-16 12:29:48)

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Comment Received for Policy 2525

#####

Name: Dean warrenfeltz
Organization: Berkeley County Schools
Email: dwarrenf@access.k12.wv.us
Title: Principal
Address1: 650 winchester Ave
Address2:
City/State/Zip: Martinsburg, WV 25401
Role: Principal
Posted: 2007-05-16 12:29:48
Posted from IP: 168.216.219.219

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Changes to the minimum number of hours for attendance in the program are not feasible within the time constraints and without a huge financial impact.

Our Pre-K teachers need Mondays to prepare for quality Pre-K activities for the week, to meet with parents, and to complete the monumental task of inputting observations for cc.net. We do not want to increase hours of the program at the expense of the quality of the 12 hours that students now attend.

No students on Mondays has provided opportunities to present on-going, research based staff development to all the personnel working with the Pre-K program. These days have also been used for Evaluation and IEP meetings for our Pre-K Special Needs population. Special needs teachers have the additional duty of performing developmental testing for all referred children and writing eligibility reports. They also draft IEP's for the IEP committees' usage and conduct meetings with parents to update existing IEP's.

The change could impact child care centers with agreements/contracts to be a part of the program in terms of space utilization for meals and before and after care.

The change impacts transportation and increases the expense of the transportation service for those programs that offer it or are required to provide it.

Some parents may not want to have their child attend an extra day or a full day. A number of parents have sought out a part-time program because they want to enjoy some time at home with their child, want to have a day a week to schedule their child's appointments, etc. or feel that their child would do better in a half-day setting.

Comment Received for Policy 2525 (2007-05-16 122948)

The change impacts Head Start and the provision of the required home visits, etc.

There are concerns about the financing and supply and demand issue of providing substitutes for cc.net data entry as well as the impact that providing substitutes would have on the routines of Pre-K children.

There is an issue with extending the day at Pikeside and convergence of traffic with transitional school.

All these impacts indicate that it is not in the best interest of our Pre-K program to increase the attendance hours.

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comment Received for Policy 2525 (2007-05-16 122948)

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Comment Received for Policy 2525 (2007-05-16 130420)

From: Nobody [nobody@wvde.state.wv.us]
Sent: Wednesday, May 16, 2007 1:04 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-05-16 13:04:20)

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Comment Received for Policy 2525

#####

Name: Ashley Pearson
Organization: Berkeley county schools
Email: ashpearson@aol.com
Title: Speech Assistant
Address1: PO Box 146
Address2:
City/State/Zip: Keedysville, MD 21756
Role: Professional Support
Posted: 2007-05-16 13:04:20
Posted from IP: 205.188.116.139

Comments for section 126-(#)-1 General

My comment deals with seciton 3.18 that changes the hour requirement from a minimum of 12 to a minimum of 16.
This change in hours will likely create a five day school week for Pre-K. This is a problem for special needs programs. There are so many referrals and children to be evaluated that a day with no children is essential to complete all the testing. It may be that to get in the hours needed, there would be only one class a day instead of two, reducing the number of children who are able to receive these services (it would be hard to solve this by creating more classes due to a lack in staffing). If this takes place, it will be completely contradictory to the spirit of this new policy. How can it be argued to increase hours for education welfare when less students will be served? Lastly, There is no reason stated for this change and I find nothing in the legislature or code or framework mandating these hours. Is there any evidence to support that more hours will be beneficial?

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comment Received for Policy 2525 (2007-05-16 130420)

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement



Comment Received for Policy 2525 (2007-05-16 133935)

From: Nobody [nobody@wvde.state.wv.us]
Sent: Wednesday, May 16, 2007 1:40 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-05-16 13:39:35)

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Comment Received for Policy 2525

#####

Name: Jeff Hoover
Organization: Tyler Cty BOE
Email: jthoover@access.k12.wv.us
Title: Superintendent
Address1:
Address2:
City/State/Zip: ,
Role: Superintendent
Posted: 2007-05-16 13:39:35
Posted from IP: 168.216.243.232

Comments for section 126-(#)-1 General

School systems with far higher qualified employees offer a far better educational model for Pre-K than does Head Start. It is a step backwards when the public school system's Pre-K program is brought down by policy to Head Start standards rather than bringing Head Start's programs up to our standards. Overall the changes are positive.

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

3.12 leave in the section where a teacher and parent can determine if a child needs a 2nd year, or not.

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

7.2 - excellent! when will the posting at the Head Starts begin to upgrade their teachers credentials?

Comments for section 126-(28)-(8) Health and Safety Requirements

8.2 - teacher caseloads shall not exceed 30. Is that 30 per day with the help of 2 aides?

Comment Received for Policy 2525 (2007-05-16 133935)

8.3 - excellent!

8.12 - let's make sure Head Start's philosophy of "anything goes" does not make their employees fearful of correcting students at the most basic level.

8.21 - "...when a child desires or exhibits the need to rest..." This do your own thing attitude of sleep when you want, and do what you want, when you want is very PC, but not in the best interest of the big picture of child development. The verbage stricken from 10.4.7g makes a great deal more sense.

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

16.1 & 16.2 some verbage that the ecers-r teams should be a mixture of Head Start and LEA members for each evaluated site. That gives a better perspective. Also, ecers-r reviews in no way should include evaluation comments about the quality of teaching. Ratings are to be shared, but personnel comments need to be saved for the employing agency. 16.3 - excellent.

Comment Received for Policy 2525 (2007-05-17 082146)

From: Nobody [nobody@wvde.state.wv.us]

Sent: Thursday, May 17, 2007 8:22 AM

To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us

Subject: Comment Received for Policy 2525 (2007-05-17 08:21:46)

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Comment Received for Policy 2525

#####

Name: Tonya Blackburn

Organization: Harrison County Schools

Email: tblackbu@access.k12.wv.us

Title: Kinidergarten Teacher

Address1: 208 Kidd Ave.

Address2:

City/State/Zip: Stonewood, WV 26301

Role: Teacher

Posted: 2007-05-17 08:21:46

Posted from IP: 168.216.230.113

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

3.12 It seems as though this section of the policy is putting more emphasis on chronological age rather than developmental readiness. There are many factors that influence developmental readiness: gender, prematurity, malnutrition, and low birth weight just to name a few. It is apparant that all children don't crawl, walk or talk at the same time yet it is now being mandated that all children, except those who have some sort of exceptionality are ready to learn at the same time. Our classrooms in pre-k and kindergarten are developmentally appropriate to all learners; yet, once students leave kindergarten they must have the skills necessary to be successful learners. Also, with No Child Left Behind, kindergarten students are given informal math assessments and DIBELS. A child who is is not able to focus and attend or a child who cannot cope emotionally may experience difficulty. There are some children who are late bloomers and require that extra year at home to matur! e. who better to make that decision for their child than a parent. This section of the policy takes that decision away from the parent. Pre-school is a wonderful opportunity for children to develop social skills such as taking turns, sharing and playing. It gives the children extended rest time and down time which may be important for children with short attention spans. I understand that sometimes pre-kindergarten evaluations have been used to target students who may benefit from a year in pre-k before attending kindergarten. I believe most teachers who recommend this to parents are only giving advice based on what would be in the best interest of the child. A parent must first agree with the teacher before a child is placed in pre-k instead of kindergarten. If the parents do not agree, then the child will ultimately be placed in kindergarten. Once again, most recomendations for children are in the best interest of the child. Children who turn 5 years old in late ! August may not be socially comfortable with students who turn ! 5 in ear ly September. There is a year's difference between these children. Some parents consider the big picture when making the decision to wait a year before sending their child to pre-school. These reasons may include the fact that

Comment Received for Policy 2525 (2007-05-17 082146)
their child may become a follower to the older students instead of have the leadership qualities that older students possess. Also, some will be going to college at 17 years old instead of 18. Parents should be the ultimate decision makers when it comes to their child, not a policy. It would seem more logical if the policy made some sort of accomodations for children who are not developmentally ready for pre-k at 4 years old. Chronological age should not be the ultimate criteria for school entrance.

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

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Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Comment Received for Policy 2525 (2007-05-17 102117)

From: Nobody [nobody@wvde.state.wv.us]

Sent: Thursday, May 17, 2007 10:21 AM

To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us

Subject: Comment Received for Policy 2525 (2007-05-17 10:21:17)

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Comment Received for Policy 2525

#####

Name: KRISTI CROOK

Organization: LEWIS COUNTY BOARD OF EDUCATION

Email: sammienursing@yahoo.com

Title: SCHOOL NURSE

Address1: 239 COURT AVENUE

Address2:

City/State/Zip: WESTON, WV 26452

Role: School System Staff

Posted: 2007-05-17 10:21:17

Posted from IP: 168.216.145.216

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

CONCERNED WITH THE RECOMMENDED CHANGES FOR SECTION 8- I HAVE BEEN A SCHOOL NURSE FOR ABOUT 4 YEARS AND HAVE BEEN DOING THE VISION, DENTAL AND HEALTH SCREENINGS. I HAVE NOTICED ON SEVERAL HEALTH CHECK EXAMS THAT THE AREAS ON VISION, HEARING, LANGUAGE, SPEECH ETC ARE ADDRESSED AS PARENT REPORTS OR CHILD REFUSED. THIS IS ONE REASON THE SCREENINGS ARE GOOD FOR PREK AND K STUDENTS. ALSO NURSES USE THE SCREENINGS FOR TALKING WITH PARENTS REGARDING HEALTH ISSUES THEIR CHILD HAVE SO WE CAN BE MORE PREPARED TO MEET WITH THEM AT THE BEGINNING OF THE SCHOOL YEAR AND COMPLETE CARE PLANS WITH THE TEACHERS THAT WILL BE HAVING THEM IN THEIR CLASSROOM.

Comment Received for Policy 2525 (2007-05-17 102117)

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Comment Received for Policy 2525 (2007-05-17 11:15:49)

From: Nobody [nobody@wvde.state.wv.us]
Sent: Thursday, May 17, 2007 11:16 AM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-05-17 11:15:49)

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Comment Received for Policy 2525

Name: LuAnn B Hendershot, AuD, CCC-A
Organization: RESA VII
Email: lbhender@access.k12.wv.us
Title: Educational Audiology Coordinator
Address1: 1201 N 15th St
Address2:
City/State/Zip: Clarksburg, WV 26310
Role: Professional Support
Posted: 2007-05-17 11:15:49
Posted from IP: 168.216.197.247

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Response to Health Requirements, Policy 2525

The guidelines for hearing screening of the preschool population have been clearly defined by ASHA (1996) and the WV Hearing Screening Task Force (1999). A copy of these documents have been mailed to Kathy Knighton at the State Department of Special Education.

ASHA and our WV Hearing Screening Task Force set these guidelines for a reason:

Based on years of controlled research, these guidelines met the criteria for sensitivity and specificity required for the identification of potentially, educationally significant, hearing loss. ASHA developed specific guidelines for the preschool population b/c " the testing procedures used for this age group require more training, instruction and caution on the part of the examiner than do traditional procedures used on older children (ASHA, 1996)

Hearing screenings must be performed by qualified individuals. The preschool population is very difficult to test. It requires time to train the children, complete the screening, and document all test results (Permanent health cards have a place for results, tests used and testers signature). If you miss identifying a child in their one and only screening, you could have a lifelong negative impact on communication, health or future academic performance. That is why ASHA recommends that this testing be performed by an audiologist or under the supervision of an audiologist.

Immittance testing to identify potential ME pathology in young children is an important part of the screening. I can understand that in a doctors office, otoscopy would suffice, but I have had many docs request immittance testing when they were not sure what they were seeing.

In a school-based preschool screening, no doctor is looking in the ears and immittance testing is an important part of the screening process B/C middle ear (ME) disease (and associated hearing loss) varies with the time of year. The Fourth Research Conference on Otitis Media recommends that screening take place in both the Spring and Fall during the preschool years (Lim, 1989). If the preschool child only has one hearing screening in their lifetime, we may be missing many educationally significant hearing losses. The data I kept from 1979 to 2001 showed that 37% of the preschool population in RESA VII had educationally significant hearing loss (more than 20dB) with or without ME pathology during their preschool years

ASHA and the WV Hearing Screening Task Force sets specific criteria for ruling out a hearing loss: the child must respond to puretone presentations at 20dB at 1000Hz, 2000Hz and 4000Hz for two out of three presentations. If immittance testing is not used then 500Hz @ 25dB must be added due to its sensitivity to ME pathology. It has been my experience in North Central WV that physicians' audiometers are set to a factory default level of 25dB (maybe b/c that is the screening level for adults). Few that I have spoken with even knew that that is not the recommended level for screening children. Much of the training that the staff receives in a physician's office is by the person who sold them the equipment. Otoacoustic emissions testing has been sold to some physicians to use as a hearing screening tool. Whereas it can be very beneficial in the birth to 2 year old population where we are trying to rule out hearing loss above 30dB, it does not meet the guidelines for screening children 36 months and older. So.....

who is going to inform the doctors that the protocol stated in the Health Check document does not match the protocol prescribed by ASHA and the WV Hearing Screening Task Force?

who is going to provide the training for the physician's staff performing the hearing screenings so that all children are receiving the same quality of service?

How are we going to know who failed and needs rescreened? Will someone at the school level review all health records and compile a list of who failed the screening and/or who did not have a screening?

How are we going to know what part of the screening the child had difficulty with? The physical forms I have seen in many years of testing Head Start children have a box that you check if hearing is OK (again based on what criteria). Most return unchecked (what does that mean?) or say CNT.

If the physicians refer any child that fails one hearing screening to an audiologist

Comment Received for Policy 2525 (2007-05-17 111549)

for evaluation, we are going to have many false positive referrals, therefore eroding confidence in the hearing screening procedure and causing undue anxiety for the parents of the children involved.

If children who cannot respond to the test in the docs office are allowed a second attempt in 4-6 months, the potential to loose that much learning time due to reduced hearing exists.

How many children do you think will get a hearing screening that could last 10 minutes or more for a 3 year old, during a 20 minute physical? Is this fair to the child or the physician?

I believe that we have had a hearing screening program in the State of WV that was among the best in the nation. We have had it whittled away repeatedly in the last few years. What is the point of making changes to policy that do not improve the procedure?

Concerns about the document:

WEST VIRGINIA COUNCIL OF SCHOOL NURSES

RECOMMENDATION
For
HEARING SCREENINGS

Hearing screening is a compulsory pre-enrollment screening for all children entering public school for the first time in this state, according to west Virginia Code §18-5-17. This hearing screening should be performed by an audiologist, speech pathologist or his/her designee (other professional trained by the audiologist). The Regional Education Service Agencies (RESA) have coordinated service delivery through audiologists who have developed "Hearing Screening Guidelines". A letter communicating the results of the screening and recommendations should be given to the parent or guardian as soon as possible. A method should be developed for tracking referrals and for encouraging follow-ups as needed. The west Virginia Education Information System (WVEIS) provides a method for recording and tracking hearing screening results.

It is the recommendation of the west Virginia Council of School Nurses that counties shall employ either an audiologist, speech pathologist or hearing specialist (what or who is a hearing specialist? Hearing aid dealer in WV can call themselves a hearing specialist. A teacher of the hearing impaired may also use this term, but an audiologist generally does not.) to perform hearing screenings. All persons/school personnel who perform hearing screenings must be trained by a (hearing specialist, such as audiologist or speech pathologist (Speech pathologists should not be training anyone to perform preschool hearing screenings. They are not "hearing specialists" and may not meet the guidelines for persons who can even screen the preschool population without further training and/or supervision). A total of 98% of west Virginia children have medical insurance and should be receiving a comprehensive physical exam (i.e. HealthCheck) annually with a hearing screening. The heal!

th provider's hearing screening results shall be valid up to one year (recommendations for the preschool population suggest 2 screenings per year since preschoolers are high risk for hearing loss associated with middle ear pathology. This fluctuating hearing loss can have an adverse effect on language and learning.) and meet the requirements of hearing screening, as indicate in W.Va. Code §18-5-17 and west Virginia State Board of Education Policy.

<http://www.wvdhhr.org/mcfh/ICAH/healthcheck/Default.htm>

No hearing screening process, consistent criteria for passing, or referral criteria are included in this document. Specific objective criteria as recommended by the American Speech, Language and Hearing Association and the WV Hearing Screening Task Force should be included in this document. A copy of said documents have been provided to Kathy Knighton at the Department of Special Education.

Comment Received for Policy 2525 (2007-05-17 111549)

Sincerely,
LuAnn B. Hendershot, AuD
Educational Audiology Coordinator
RESA VII
1201 N 15th Street
Clarksburg, WV 26301
304-624-6554, ext 228
lbhender@access.k12.wv.us

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

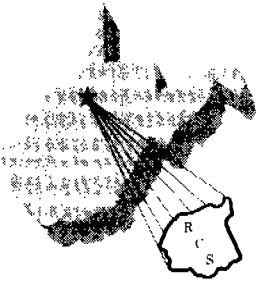
Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement



Ritchie County Schools

134 South Penn Avenue, Harrisville, WV 26362
Dr. Richard Butler, Superintendent

Telephone 304-643-2991
Fax 304-643-2994

TO: WVASA Members
FROM: Rick Butler, Pre-K Committee Chair
DATE: May 17, 2007
SUBJECT: Some Areas of Interest in Policy 2525

5/23/07
Anthony Jones
Supt. Perspective
Questions, please call 2525!
Thanks,
[Signature]

Following is a list of areas that caught my attention as I reviewed Policy 2525 (on comment until June 11, 2007). There certainly may be other areas that interest you and I would encourage you to provide comments to WVDE prior to June 11.

- 2.1.1 Good change – eliminates parent placement choice
- 2.1.3 Establishes WVELSF as part of required curriculum
- 2.1.9 Establishes ECERS-R as “official” evaluation instrument
- 3.10 Characteristic of a lot of new language encouraging hands-on, interactive activities
- ✓ 3.18 **Check this one carefully**, screws up 2-3/3-2 day plans some counties may be using
- 6.1 Characteristic of a lot of new language requiring more collaborative input
- 6.3 New term – I think they meant “county collaborative team”
- ✓ 6.6 **Introduces a “sanction”** if changes not submitted and approved
- ✓ 6.7 **No changes here but keeps the 50% community classroom requirement by 2012-13**
- 6.10 Requires specific professional development
- 6.13 Moves contract and budget deadlines from July 15 to August 1
- 6.14 Requires use of “universal” application and enrollment process
- 7.1 thru 7.9 Establishes a new “dichotomy” of requirements for Pre-K teachers and grandfathers non-certified people in 2014.
- 8.6 New immunization language
- 8.7 Requires HealthCheck form
- 8.18 Micromanages potty time
- 8.21 Micromanages nap time
- ✓ 9.2 **Requires new Pre-K classrooms to “equipped as required”**
- ✓ 13.3 **Requires joint planning time for teachers, co-teachers, and “other professional personnel”** ?
- 15.5 -- 15.5.2 Requires WV Pre-K to be free to parents

Control # 7237

126CSR28

POLICY 2525: West Virginia's Universal Access to a Quality Early Education System

COMMENT PERIOD ENDS: June 11, 2007

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2525: West Virginia's Universal Access to a Quality Early Education System. Additional sheets may be attached, if necessary.

Name: SUE PEROS, RN, MS Organization: Boone County Schools
 Title: School Nurse Director
 Street Address: 69 Ave. B
 City: Madison State: WV Zip: 25130

Please check the box below that best describes your role.

- School System Superintendent
- School System Staff
- Parent/Family
- Principal
- Teacher
- Business/Industry
- Professional Support Staff
- Service Personnel
- Community Member

COMMENTS/SUGGESTIONS
<p>'126-(#)-1. General.</p>
<p>'126-(28)-(2). Guidelines.</p>

126CSR28

<p>' 126-(28)-(3). Definitions.</p>
<p>' 126-(28)-(4). Parent/Guardian Involvement and Family Support.</p>
<p>' 126-(28)-(5). Attendance.</p>
<p>' 126-(28)-(6). Collaboration and the County Plan.</p>
<p>' 126-(28)-(7). Personnel Standards</p>
<p>' 126-(28)-(8). Health and Safety Requirements <i>I really liked the new specific language re: the Pre-K Exam and when it is due. also - very important that we stop repetitive screenings! Thank you!</i></p>
<p>' 126-(28)-(9). Standards for Preparing Students.</p>

Comment Received for Policy 2525 (2007-05-18 120312)

From: Nobody [nobody@wvde.state.wv.us]

Sent: Friday, May 18, 2007 12:03 PM

To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us

Subject: Comment Received for Policy 2525 (2007-05-18 12:03:12)

Please save this email in a "Comments Received Online" folder. Your folder will be a backup. All comments are saved in our database. The Complete Comments Report from the database can be found here:

<http://129.71.2.32/r.html?id=c111c98fb15f6cc4d70b69060b8abc65>

This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 2525

#####

Name: Scott Cochran

Organization:

Email: scochran@access.k12.wv.us

Title:

Address1: 1189 erbacon rd.

Address2:

City/State/Zip: cowen, wv 26206

Role: Principal

Posted: 2007-05-18 12:03:12

Posted from IP: 168.216.220.9

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

I feel as a Parent and a High School Administrator that the proposed policy changes are not what is in the best interest of 4 or 5 year old children. Just because my son is five years old and attended a pre-k program this year doesnt make him ready to attend Kindergarden. I and his teacher know what is in the best interest for him not this policy. Because of social or maturity issues i should be able to decide what is best for my son and not driven by this policy change. I also feel that reasons for permitting another year of pre-K is driven way to much by Special Ed. policies. We as educators should do what is best for the 4 or 5 year old now and not set them up for failure down the road.

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Comment Received for Policy 2525 (2007-05-18 120312)

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Comment Received for Policy 2525 (2007-05-18 155525)

From: Nobody [nobody@wvde.state.wv.us]
Sent: Friday, May 18, 2007 3:55 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-05-18 15:55:25)

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Comment Received for Policy 2525

Name: April Carpenter
Organization: Lakeside Elementary School
Email: keylimepie71@netzero.com
Title: Parent
Address1: Rt.3 box 119
Address2:
City/State/Zip: Hurricane, WV 25526
Role: Parent-Family
Posted: 2007-05-18 15:55:25
Posted from IP: 64.136.49.225

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

I am parent of a child who will be attending Lakeside Elementary Pre-K in the fall and I am very upset that you are not wanting to let the Pre-K ride the bus. To the best of my knowledge there have not been any complaints or problems due the children who currently ride, nor do I think it is in any way fair you to provide transportation for a "Special needs Child" and no transportation for those without. I am sure that's called discrimination. I would have the same problem if you were telling me my child could not ride if they had " Special Needs" I had one child go through Pre-K at the same school and have known children every year thereafter to

Comment Received for Policy 2525 (2007-05-18 155525)
ride without difficulty. I don't see the logic in putting one child on the bus and
follow the same bus to the school to drop off the other!!!!

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Comment Received for Policy 2525 (2007-05-18 215344)

From: Nobody [nobody@wvde.state.wv.us]

Sent: Friday, May 18, 2007 9:54 PM

To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us

Subject: Comment Received for Policy 2525 (2007-05-18 21:53:44)

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Comment Received for Policy 2525

#####

Name: Bill Marcum

Organization:

Email: holstermaker@suddenlink.net

Title:

Address1: rt 1box55a

Address2:

City/State/Zip: kermit, wv 25674

Role: Service Personnel

Posted: 2007-05-18 21:53:44

Posted from IP: 75.109.49.184

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

how many full time cooks and part time cooks are there per student? or in other words for every 75 or 100 students there should be (1)cook, is it up to each county to decide ? or is there a state law stating for every so many students there will be X number of cooks, who decides and what is it? thank you

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) standards for Preparing Students

Comment Received for Policy 2525 (2007-05-18 215344)

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

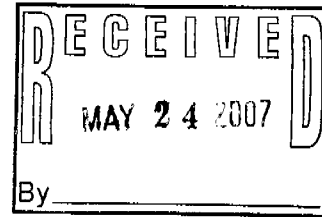
Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Cathy Jones
Office of Special Programs
Extended and Early Learning
Capitol Building 6, Room 304
1900 Kanawha Blvd., East
Charleston, WV 25305



Beverley A. Kane
9240 Winchester Ave.
Bunker Hill, W. Va. 25413
May 21, 2007

Dear Madam,

Concerning the extension of the special needs pre-school at Pikeside where I work as a Teacher's aide, I would like to comment on this proposed policy.

I feel that a longer day will not benefit the children. They have a hard time focusing on Their work for 3 hours. Adding more time to their day will really make them more tired And irritable. Some come in tired and want to sleep . An earlier day will not help this.

The teachers and aides use Mondays now to do planning and special projects. The teachers have assessments on new students and do IEP meetings on Mondays. Staying longer will not help the morale of the teachers and aides.

The financial costs to have substitutes replace the teachers and aides while they go to Special training classes usually done on Mondays will be very expensive.

I understand the southern counties don't have as many children as we do. We can't help That so many people have moved here and have lots of special needs children.

The buses will have to do more running and that will cost more.

The transition school that is held after the pre-school is out for the day, will be affected If this policy is used. The transition school is for middle and high school students who Couldn't behave themselves in their schools. After so many infractions, they go to Transition school to be taught their book lessons and how to control their behavior.

Please re-consider the policy and not have so many hours for the children and us , so that We can do a better job with these special children.

Sincerely,
Beverley A. Kane

From: Heidi Bach [energyabc30@yahoo.com]
Sent: Wednesday, May 23, 2007 3:30 PM
To: ctrjones@access.k12.wv.us
Subject: proposed changes for Policy 2525
Dear Ms. Jones-

I am writing to express my concerns with some of the proposed changes regarding Policy 2525. As a manager for a PreK program, I am most concerned with the proposed increase in the minimum number of hours (from 12 to 16 hours per week) . Although I can understand the desire to provide more classroom time for our children, I also know that increasing classroom time will decrease the quality of the programs as well as the completion of many requirements the teachers have. For example, the teachers are required to enter data for cc.net. A minimum of 6,000 entries are required for a regular ed teacher who has two half-day classes. Teachers also need time for collaborative weekly planning, to participate in trainings, to conduct screenings/assessments and to attend IEP meetings, just to mention a few. The impact would also be a financial one because substitution would be necessary for teachers to fulfill their other responsibilities.

Thanking you in advance for your time and consideration. Heidi Bach

Now that's room service! Choose from over 150,000 hotels
in 45,000 destinations on Yahoo! Travel to find your fit.

From: jkb2705@comcast.net
Sent: Monday, May 21, 2007 3:23 PM
To: ctrjones@access.k12.wv.us
Subject: Pre-K 16 hour policy

I am writing this e-mail in regards to the pre-k policy 2525. I am an employee of RESA VIII Head Start in Berkeley County and I would like to share my thoughts about the proposed 16 hour school week for pre-k children. These changes will be detrimental to education of the children and the quality and consistency of our program. Having a 16 hour week will impact on the amount of time teachers' use for assessments, trainings, planning and servicing our families. As a Head Start program we assist families with health services and pride ourselves on family involvement. This policy will take this valuable time away. In my opinion, I think the state has the right to impose a minimum, but 16 hours is not a realistic number for all pre-k programs. I am strongly opposed to the 16 hour school week. Thank you for your time and consideration in this ! matter.

Jennifer Bennett

Comment Received for Policy 2525 (2007-05-22 124727)

From: Nobody [nobody@wvde.state.wv.us]
Sent: Tuesday, May 22, 2007 12:47 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-05-22 12:47:27)

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Comment Received for Policy 2525

#####

Name: Katie Berry
Organization: Monongalia County Starting Points
Email: kberry@access.k12.wv.us
Title: Program Coordinator
Address1: 668 River Rd.
Address2:
City/State/Zip: Morgantown, WV 26505
Role: Community Member
Posted: 2007-05-22 12:47:27
Posted from IP: 168.216.186.242

Comments for section 126-(#)-1 General

None

Comments for section 126-(28)-(2) Guidelines

None

Comments for section 126-(28)-(3) Definitions

I question the decision to not include 5 year old children in the classroom, if they have not previously been in the Pre-K program. I have many friends and colleagues who have expressed concern over the situation of a child with a "late" birthday-turning 5 in August/July, whom they feel may no be ready for the Pre-k and kindergarten environments based on the September 1st cutoff. If the parents delay entry into Pre-K the first year, they have no option if they make the decision to delay Kindergarten as well. I feel an exception should be made for children and families in this situation

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

None

Comments for section 126-(28)-(5) Attendance

None

Comments for section 126-(28)-(6) Collaboration and the County Plan

None

Comments for section 126-(28)-(7) Personnel Standards

See 16 (Program Evaluation for Quality Improvement) comments.

Comments for section 126-(28)-(8) Health and Safety Requirements

I feel the classroom ratio is too high. One teacher/aide to every ten students is
Page 1

Comment Received for Policy 2525 (2007-05-22 124727)

not enough, especially in an inclusive environment of most classrooms (in Monongalia County). Teachers are often faced with the situation of having to address the increased needs of the special needs student, resulting in a loss of instructional time for the remainder of the students. Alternately, the opposite may occur when the teacher feels unqualified, lacks motivation, or time to address the needs of the special needs student and the student gets lost in the rest of the class and misses out on his/her learning and development. I feel there is also a contradiction to the ratio when it is stated that all children must be supervised while using the restroom. Typically when children are using the restroom it is two to three at a time with an adult. This leaves the other adult in the classroom with a ratio that is far above the regulated amount. It would also be virtually impossible for the aide or teacher to take ten children to the restroom, and to supervise them while there. A policy suggestion would be to have a decreased ratio for each classroom and utilize part-time teachers or to require consistent itinerate staff for additional classroom coverage.

Comments for section 126-(28)-(9) Standards for Preparing Students

None

Comments for section 126-(28)-(10) Curriculum and Assessment

None

Comments for section 126-(28)-(11) Transition and Continuity

None

Comments for section 126-(28)-(12) Inclusive Environments

None

Comments for section 126-(28)-(13) Staff Development and Training

None

Comments for section 126-(28)-(14) Program Oversight

None

Comments for section 126-(28)-(5) Financing

None

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

I have concern over the local Board of Education bureaucracy (seniority/hiring/firing policy) practices affecting the quality of many of the classrooms. I feel measures to prevent this are not adequately addressed in this portion of the policy. Although the teacher may meet the Personnel Standards discussed in 126-(28)-(7), this does not ensure they are implementing a quality early childhood environment for the students. I feel this is a critical time in a child's learning and by simply following the teacher evaluation process set forth by the county and state (WVBE 5310) board of education policies we are inhibiting the possibility for quick and immediate action for programs that are not of quality. We must hold our Pre-K programs and teachers to a higher standard, if we want to ensure for longitudinal success.

Comment Received for Policy 2525 (2007-05-22 130207)

From: Nobody [nobody@wvde.state.wv.us]

Sent: Tuesday, May 22, 2007 1:02 PM

To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us

Subject: Comment Received for Policy 2525 (2007-05-22 13:02:07)

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Comment Received for Policy 2525

#####

Name: Paula Ellison

Organization: Universal Pre-K

Email: pellison@access.k12.wv.us

Title: Preschool Special Needs Teacher

Address1: 108 College Drive

Address2:

City/State/Zip: Peterstown, WV 24945

Role: Teacher

Posted: 2007-05-22 13:02:07

Posted from IP: 168.216.31.110

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Eligible Child - Please clarify if a speech (only) IEP is enough documentation to support the need for a five year old child to repeat pre-k.

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comment Received for Policy 2525 (2007-05-22 130207)

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Comment Received for Policy 2525 (2007-05-23 085455)

From: Nobody [nobody@wvde.state.wv.us]
Sent: Wednesday, May 23, 2007 8:55 AM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-05-23 08:54:55)

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Comment Received for Policy 2525

#####

Name: Karen Underwood
Organization:
Email: mrsunderwood@hotmail.com
Title:
Address1: PO Box 324
Address2:
City/State/Zip: Hilltop, WV 25855
Role: Parent-Family
Posted: 2007-05-23 08:54:55
Posted from IP: 168.216.99.255

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comment Received for Policy 2525 (2007-05-23 085455)

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Head Start programs provide breakfast and lunch at no cost. The public school's preschool program charges for breakfast and lunch. If meals are provided free in one place, then they should be provided in all places.

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Comment Received for Policy 2525 (2007-05-24 084847)

From: Nobody [nobody@wvde.state.wv.us]
Sent: Thursday, May 24, 2007 8:49 AM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-05-24 08:48:47)

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Comment Received for Policy 2525

#####

Name: Marlene Midget
Organization:
Email: mmidget@npheadstart.org
Title: Executive Director
Address1: 51 16th Street Fourth Floor
Address2:
City/State/Zip: wheeling , WV 26003
Role: Community Member
Posted: 2007-05-24 08:48:47
Posted from IP: 64.181.124.10

Comments for section 126-(#)-1 General

Agree

Comments for section 126-(28)-(2) Guidelines

2.1.5- What does "curricular frameworks" mean

Comments for section 126-(28)-(3) Definitions

3.12 Change wording from including toilet training to "or" toilet training. Currently it reads as if toilet training is a developmental delay. Child remaining in program for longer than 1 year-does this contradict HS Perf. Standards? 3.26
-Agree

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Agree

Comments for section 126-(28)-(5) Attendance

Agree

Comments for section 126-(28)-(6) Collaboration and the County Plan

6.3.1 and 6.3.4 - these statements contradict each other
6.4 State must enforce guidelines and policies of 2525 not leave it up to the local team to enforce or question. 6.7 Can the percentage or ratio of money returned to community partners be designated by 2525-ex. 10%. 6.9-Agree that classroom teachers be part of team. Who pays for sub?

Comments for section 126-(28)-(7) Personnel Standards

Agree

Comments for section 126-(28)-(8) Health and Safety Requirements

Comment Received for Policy 2525 (2007-05-24 084847)

8.2 Disagree with 1:20 staff/child ratio during naptime. Explain 'teacher caseload ..shall not exceed 30
8.5 Add- at no cost to the parent/guardian.
8.1.4.3-Add-staff person who has been trained in Passive Restraint 8.27.2-Add-child must be in a child restraint(seat belt).
8.28.5 Clarify - video games 8.30-Add-a hazardous materials list should be on site at all times.

Comments for section 126-(28)-(9) Standards for Preparing Students

Agree

Comments for section 126-(28)-(10) Curriculum and Assessment

Agree

Comments for section 126-(28)-(11) Transition and Continuity

Agree

Comments for section 126-(28)-(12) Inclusive Environments

Agree

Comments for section 126-(28)-(13) Staff Development and Training

Agree

Comments for section 126-(28)-(14) Program Oversight

Agree

Comments for section 126-(28)-(5) Financing

15.5.2 why does 2525 say that a reduction in child care tuition during pre-k hours, if pre-k is supposed to be at no cost to the parent?

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Agree

Comment Received for Policy 2525 (2007-05-29 11:26:03)

From: Nobody [nobody@wvde.state.wv.us]
Sent: Tuesday, May 29, 2007 11:26 AM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-05-29 11:26:03)

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Comment Received for Policy 2525

#####

Name: Kim Hough
Organization: Berkeley County Schools
Email: klhough@access.k12.wv.us
Title: Assistant Director of Special Education
Address1: 401 S. Queen St.
Address2:
City/State/Zip: Martinsburg, WV 25401
Role: School System Staff
Posted: 2007-05-29 11:26:03
Posted from IP: 168.216.255.220

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

8.2

The reduction of a teacher caseload per day from 40 to 30 is a concern. This means that we will have to provide 25% more staffing to implement Pre-K programs. In addition to being a financial concern while we are purchasing furniture and curriculum materials to set up numerous new classrooms, locating 25% more highly qualified staff while competing with surrounding out-of-state districts will be challenging.

8.7

Currently EPSDT services are not offered through our county health department. It is unclear whether or not local physicians and the health department will be able to complete the vision, hearing, speech, dental, and developmental screenings as well as the physical examinations. Because of the growth of the community, health services are also in great demand.

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comment Received for Policy 2525 (2007-05-29 112603)

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

8.2

The reduction of a teacher caseload per day from 40 to 30 is a concern. This means that we will have to provide 25% more staffing to implement Pre-K programs. In addition to being a financial concern while we are purchasing furniture and curriculum materials to set up numerous new classrooms, locating 25% more highly qualified staff while competing with surrounding out-of-state districts will be challenging.

8.7

Currently EPSDT services are not offered through our county health department. It is unclear whether or not local physicians and the health department will be able to complete the vision, hearing, speech, dental, and developmental screenings as well as the physical examinations. Because of the growth of the community, health services are also in great demand.

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Comment Received for Policy 2525 (2007-05-29 124601)

From: Nobody [nobody@wvde.state.wv.us]
Sent: Tuesday, May 29, 2007 12:46 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-05-29 12:46:01)

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Comment Received for Policy 2525

Name: Cathy Stout
Organization: Jackson County Schools
Email: ccstout@access.k12.wv.us
Title: Preschool Coordinator
Address1: P.O. Box 770
Address2:
City/State/Zip: Ripley, WV 25271
Role: Teacher
Posted: 2007-05-29 12:46:01
Posted from IP: 168.216.111.237

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

3.12 - Regarding the statement that three year old children can be included if they meet the enrollment guidelines of the community partner: If childcare or Head Start are our collaborative partners and they enroll three year olds without IEPs, then are those children eligible for state aid formula? If so and we are to have universal enrollment, could these same three year olds not attend any program in the county that is part of the collaborative, including LEA programs if parents request? It seems that any three year old could be included with few exclusions.

Regarding the statement that only IEP children may be in pre-k as five year olds: Is the statement following the IEP statement listing who must be a member of the determining team intended to define the EC/IEP group or another team that could place other five year olds in PRE-K? This is unclear. If it is the 2419 multidisciplinary evaluation team or EC/IEP team, this document does not need to define those members. Regardless of which children the team is to address, it should say "specialist(s)" in the areas of concern. Not every child needs a behavior support specialist and many need other types of specialists.

Regarding 3.16 - Do children no longer have to have developmental screening?

Regarding 3.18 Minimum hours should be 14 or 15. We have many parents that only want two days and two whole school days work best for them with other children in school. School days for children are usually 7-7 1/2 hours. Plus, schools are required to provide transportation to IEP children. You will bankrupt counties requiring them to put buses on the road for four trips per day (mid-day runs). Sixteen hours would only be possible in four 1/2 days.

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comment Received for Policy 2525 (2007-05-29 124601)

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Regarding 7.4.2 - Specialized Training - How many hours are required?

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

1.6.1 Regarding ECERS teams - Direct supervision refers to building principals rather than county level directors?

Comment Received for Policy 2525 (2007-05-29 170410)

From: Nobody [nobody@wvde.state.wv.us]
Sent: Tuesday, May 29, 2007 5:04 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-05-29 17:04:10)

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Comment Received for Policy 2525

#####

Name: Linda S. Johnson
Organization: RESA V111 Head Start
Email: kidkare911@yahoo.com
Title: Teacer Assist.
Address1: p.o. box 295
Address2:
City/State/Zip: Inwood, WV 25428
Role: Professional Support
Posted: 2007-05-29 17:04:10
Posted from IP: 70.16.172.231

Comments for section 126-(#)-1 General

Head Start is often the child's first experience away from the family. For most, this is their first formal learning experience. Extending the time to require a sixteen hour week would be a disservice to the child. Flexibility is an absolute necessity in any early childhood program. The change will create a situation which will negatively impact the children we serve. Quality does not always depend on quantity. Our children are best served by staff who are well prepared and have had time to plan developmentally appropriate programs. It takes a great deal of time to meet with parents in the home in order to include the parents, the childrens first teacher, in the planning of the program. Staff will no longer be available to meet the many needs of the family if the school day is extended. Staff will no longer be available for vital trainings, which allow us to meet the needs of our families. I have been in the field of early childhood education for 27 years. Please allow those!

of us in the field to continue to nurture and guide these young children in a QUALITY program which takes time and effort to create and maintain.

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comment Received for Policy 2525 (2007-05-29 170410)
Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

If our school week is extended to a minimum of 16 hours there will be no time for vital staff training and development.

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Comment Received for Policy 2525 (2007-05-29 193316)

From: Nobody [nobody@wvde.state.wv.us]

Sent: Tuesday, May 29, 2007 7:33 PM

To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us

Subject: Comment Received for Policy 2525 (2007-05-29 19:33:16)

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Comment Received for Policy 2525

#####

Name: Diana Montgomery

Organization: Berkeley County Schools

Email: dlmslp@hotmail.com

Title: Speech Language Pathologist

Address1: 405 Galloway Road

Address2:

City/State/Zip: Martinsburg, WV 25403

Role: Professional Support

Posted: 2007-05-29 19:33:16

Posted from IP: 208.10.6.30

Comments for section 126-(#)-1 General

I am a speech therapist for preschoolers with special needs. My Mondays are extremely busy with evaluations, writing assessment reports, drafting IEPs, initial and annual IEP/Eligibility meetings, and planning. When Mondays are not completely booked with evaluations and meetings, I need them as planning time to communicate with parents, plan for therapy, construct visual support strategies/augmentative communication systems, and to participate in staff developments/trainings. Therefore, to lose Mondays under the proposed policy plan would cause a problem for time needed to perform these duties. If students came full day for Tuesday-Friday, only half of the students would be served in this area. As this area continues to expand so does the need for more services. The growth in Berkeley County is ongoing and steady. Thank you for considering my comments on this matter. Sincerely, Diana Montgomery

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comment Received for Policy 2525 (2007-05-29 193316)

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Comment Received for Policy 2525 (2007-05-30 122935)

From: Nobody [nobody@wvde.state.wv.us]
Sent: Wednesday, May 30, 2007 12:30 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-05-30 12:29:35)

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Comment Received for Policy 2525

#####

Name: Carla Fluharty
Organization: wetzel County Schools
Email: cfluhart@access.k12.wv.us
Title: Pre-K/Preschool Special Needs Teacher
Address1: RR1, Box 108 A
Address2:
City/State/Zip: Metz, WV 26585
Role: Teacher
Posted: 2007-05-30 12:29:35
Posted from IP: 168.216.129.17

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

I have a real concern with parents not being allowed to exercise their right as a parent to keep their child in a Pre-K program a second year. Some children do not have the maturity they need for kindergarten. They do not necessary, and in most cases to not have a special need. I don't think parents or teachers should lose the chance to help a child mature with another year of pre-k.

I am glad to see a change in contact hours. I am not sure that it is enough to keep administrators from making changes that can hurt. I had an administrator comment to me that the Pre-k positions could be changed to half time positions. A half time employee according to him does not have to be given planning.

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Are the community partners going to be willing to give up some of their control. We have had problems in the past with confidentiality issues with our local Head Start. They are unwilling to share information.

Comments for section 126-(28)-(7) Personnel Standards

Comment Received for Policy 2525 (2007-05-30 122935)

Comments for section 126-(28)-(8) Health and Safety Requirements

I would like some clarification about caseloads. What are the specific number of children allowed in an integrated classroom. Are speech only IEP's included in that number.

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Thank you for allowing service staff to be included in Pre-K trainings. That has not been allowed in the past in our county.

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Comment Received for Policy 2525 (2007-05-30 141720)

From: Nobody [nobody@wvde.state.wv.us]
Sent: Wednesday, May 30, 2007 2:17 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-05-30 14:17:20)

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Comment Received for Policy 2525

#####

Name: Helen Davies
Organization: Monongalia County Head Start
Email: hdavies@access.k12.wv.us
Title: Head Start/Pre-k Coordinator
Address1: 1433 Dorsey Avenue
Address2:
City/State/Zip: Morgantown, WV 26501
Role: School System Staff
Posted: 2007-05-30 14:17:20
Posted from IP: 168.216.135.113

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Add a statement such as:
Teachers holding a Preschool special Needs certification will also be able to count the time they spend delivering the curriculum as individualized for each child with an IEP as also delivering the IEP objectives when the two are the same.

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) standards for Preparing Students

Comment Received for Policy 2525 (2007-05-30 141720)

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Comment Received for Policy 2525 (2007-05-31 112608)

From: Nobody [nobody@wvde.state.wv.us]
Sent: Thursday, May 31, 2007 11:26 AM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-05-31 11:26:08)

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Comment Received for Policy 2525

#####

Name: Robin Romano
Organization:
Email: gse02241@mail.wvnet.edu
Title:
Address1: P.O. Box 9
Address2:
City/State/Zip: Cowen, WV 26206
Role: Parent-Family
Posted: 2007-05-31 11:26:08
Posted from IP: 129.71.136.145

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

I am writing in response to pre-school teachers not being allowed to take five year olds. If not for my sons preschool teacher being able to take him he would have had to go on to kindergarten and be the youngest in his class, and perhaps having trouble and being retained. Now he is in the fourth grade and making either the A or B honor roll and enjoying his friends and classwork. Please do not take the decision to hold a child back in preschool away from the teachers just because a child is five years old, some children grow and mature at a different rate than other children and need the extra year in preschool to help them adjust and become socially acclimated because they are shy or they are the youngest in their group. Please reconsider this decision you are making regarding the children of this state.

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Comment Received for Policy 2525 (2007-05-31 112608)

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

2

Comment Received for Policy 2525 (2007-06-01 001602)

From: Nobody [nobody@wvde.state.wv.us]
Sent: Friday, June 01, 2007 12:16 AM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-06-01 00:16:02)

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Comment Received for Policy 2525

Name: Claudia Martin
Organization: RESA VIII/Head Start
Email: cmartin71@aol.com
Title: Teacher
Address1: 13702 woodland Hts. Dr.
Address2:
City/State/Zip: Hagerstown, MD 21742
Role: Teacher
Posted: 2007-06-01 00:16:02
Posted from IP: 152.163.100.77

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

As a teacher in the pre-k/head start program I must implore you to reconsider increasing the minimum number of hours for a child to attend the program. Many of the children have never experienced formal education and to increase the number of hours they attend could be detrimental to their achieving their full potential because of fear. One of the guidelines you encourage is parent/family involvement and accepting each child as part of a family. Our program requires a minimum of 2 home visits a year, 2 formal parent conferences and active parent participation. If the children's day is lengthened, it will take away from the time teachers have to do home visits where we actively show the parents how to be involved in their child's learning experiences. Lengthening the day will also have an effect on the continued training of the staff as we are required to have training and to expect all of the continued ed training to be done on the employee's personal time is unrealisti! c. Please reconsider this decision for the welfare of these early learners.

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards
Page 1

Comment Received for Policy 2525 (2007-06-01 001602)

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Comment Received for Policy 2525 (2007-06-01 114342)

From: Nobody [nobody@wvde.state.wv.us]

Sent: Friday, June 01, 2007 11:44 AM

To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us

Subject: Comment Received for Policy 2525 (2007-06-01 11:43:42)

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Comment Received for Policy 2525

#####

Name: Tammy Clarkson

Organization: HJK Elementary

Email: tclarkso@access.k12.wv.us

Title: Preschool Teacher

Address1: 803 Kaiser Avenue

Address2:

City/State/Zip: Ravenswood, WV 26164

Role: Teacher

Posted: 2007-06-01 11:43:42

Posted from IP: 168.216.91.159

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Regarding 3.12 Eligible Child - Does the final sentences ("The child may remain in the program for longer than one year if the decision is in the best interest...") apply to children WITHOUT IEPs? Since it follows that sentences regarding special needs, I was assuming not. However, if it does apply to all students, perhaps the statement could be worded to indicate that it is. If it DOES NOT apply to children WITHOUT IEPs, I would like to see that changed to include ALL children in the classroom. We occasionally have students (i.e., children with summer birthdates) that are not ready for the kindergarten experience for a variety of educationally sound reasons, and parents do not want them to attend and risk a possible retention.

Most parents want their children to begin their academic education with the best foundation possible. While I agree that the decision should be based on best interest and curricular assessment data and not just parents, it should be a decision!

available to all preschool students not just those with IEPs. Lastly, in my experience, kindergarten teachers do not agree with policies that send a child to kindergarten solely based on age (i.e. Head Start sending them because they cannot service them if they are school age) because these policies do not look at the best interest of ALL children, especially when 4 day programs are available. These types of policies are where we begin leaving children behind!

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comment Received for Policy 2525 (2007-06-01 114342)

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Why was the old section 8.7 regarding screening for impairments/delays removed? First of all, it is a means to let the community know that preschool services are available. Furthermore, all children enrolling into public schools must have a speech/language, hearing and vision screenings, and the countywide developmental screening clinic provides us with the opportunity to do this without interrupting instructional time. When developmental screening is done as well, it provides a general baseline for overall progress in addition to the first 12 week progress report. It also gives parents information about what their children are ready to learn next. It can be a parent education opportunity.

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Comment Received for Policy 2525 (2007-06-01 115629)

From: Nobody [nobody@wvde.state.wv.us]
Sent: Friday, June 01, 2007 11:56 AM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-06-01 11:56:29)

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Comment Received for Policy 2525

#####

Name: Nicholas County Early Learning Collaborative

Organization:

Email: mrdavis@access.k12.wv.us

Title:

Address1: 400 Old Main Drive

Address2:

City/State/Zip: Summersville , WV 26651

Role:

Posted: 2007-06-01 11:56:29

Posted from IP: 168.216.39.167

Comments for section 126-(#)-1 General

2.1.9 reads "evaluate program SUCCESS." ECERS-R is an environmental rating scale and should read "evaluate program ENVIRONMENT." Program evaluation should involve child outcomes, surveys, interview, etc.

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

3.7 needs to read "LICENSED provider of early childhood services. 3.10 should read substantial portion of the day AS DEFINED BY ECERS-R" Substantial is open to interpretation. 3.12 The first underlined portion utilizes IEP to resolve eligibility issues. The last two sentences, starting with "In a WV pre-k classroom" contradicts the earlier statement that IEP is the determining factor. 3.13 "OBSERVER" is used. In 2.1.9, the term EVALUATOR is used. The language needs to be consistent.

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

7.7 This is an unfunded mandate and will devastate child care centers, eliminating them from the collaborative process. A child care provider who has extensive hands on experience, has completed ACDS, and has specialized training in Early Childhood

Comment Received for Policy 2525 (2007-06-01 115629)
could potentially be as "qualified" as a bachelor-level teacher. There will be no more money in 2013-14 than there is now. Even if someone has "permanent" authorization, due to inevitable turnover, a potentially good child care program would be knocked out of the collaborative process. Even if by some miracle there would be funding available for higher salaries, child care will never be able to match the benefits of BOE employees. Even partners such as Head Start will not be able to match BOE salaries.

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Comment Received for Policy 2525 (2007-06-01 123804)

From: Nobody [nobody@wvde.state.wv.us]
Sent: Friday, June 01, 2007 12:38 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-06-01 12:38:04)

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Comment Received for Policy 2525

Name: David LeMaster
Organization:
Email: dlemaster@bop.gov
Title:
Address1: 411 Charles Street
Address2:
City/State/Zip: GLENVILLE, WV 26351
Role: Parent-Family
Posted: 2007-06-01 12:38:04
Posted from IP: 72.84.50.121

Comments for section 126-(#)-1 General

It has come to my attention effective for the 2007-2008 school year my child will be denied access to WV Pre-k. A change is being recommended to exclude children whom turn 5 years old before September 1 in Policy 2525 Section 3.12. My wife and I have been proactive in my child's education even before entering your school system. Until this recent proposal, enrollment into WV Pre-k was determined by mutual agreement between the teacher and parent/guardian. My son's date of birth is August 31, 2002. Prior to the 2006-2007 school year, my wife, whom is a teacher, had several discussions with other teachers currently in the school system. It was deemed through those conversations "not in the best interest of the child" to place him in WV Pre-k last year. It is well documented that the development of young boys is slower than their female counterparts. This information was even conveyed to me today, June 1, 2007, by members of the Gilmer County Board of Education. It disturbs me that the West Virginia Department of Education is no longer worried about the best interests of the child. This is supported by the removal of those words in your Policy 2525 Section 3.12.

I urge you to reconsider the implementation of proposed changes for two main reasons: 1 - My child's development will be hindered due a change in policy. A policy we were in compliance with before and during the 2006-2007 school year. 2 - This is not in the best interest of child.

David LeMaster

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comment Received for Policy 2525 (2007-06-01 123804)
Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Comment Received for Policy 2525 (2007-06-01 125714)

From: Nobody [nobody@wvde.state.wv.us]
Sent: Friday, June 01, 2007 12:57 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-06-01 12:57:14)

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Comment Received for Policy 2525

Name: Nicholas County Early Childhood Collaborativeq
Organization:
Email: mrdavis@access.k12.wv.us
Title:
Address1: 400 Old Main Drive
Address2:
City/State/Zip: Summersville, WV 26679
Role: Professional Support
Posted: 2007-06-01 12:57:14
Posted from IP: 168.216.39.167

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

4.1.1 needs stronger language to encourage home visits.

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

6.13 Since Day care runs the risk of having their contracts not approved by the BOE and because applications have been taken and classrooms planned, the date should be earlier than July 15, rather than later. 6.14 Universal application presents some issues: Head Start needs income information on the application; BOE's are not allowed to "require" income information. Head Start is reluctant to allow language that makes income information an optional part of the application.

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

3.16 We support language that HealthCheck be "recommended" rather than required. Some providers have developed an equivalent form to meet Head Start requirements.

Comment Received for Policy 2525 (2007-06-01 125714)
Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Friday, June 01, 2007 6:01 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-06-01 18:00:49)

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Comment Received for Policy 2525

Name: LuAnn Radcliffe
Organization: Brooke County Pre School at Grandma\'s House Child Care Center
Email: brookemulti@verizon.net
Title: administrator
Address1: 701 Virginia Anenue
Address2:
City/State/Zip: Follansbee, WV 26037
Role: School System Staff
Posted: 2007-06-01 18:00:49
Posted from IP: 71.182.32.215

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

I feel that there should be some "help" to the County teams when deciding the best hours to offer pre school classes. For the past three years that we have been involved in this program we have had a AM class 9:00 - 11:30 and PM class 12:00 - 2:30 five days a week. This does not allow extra time for the family involvement that I feel should be happening. We do not have enough time now to do home visits or meet with teachers from other WV pre schools to collaborate. Now the hours are increasing from 12 to 16 hours per week. How will two classes be able to be done back to back without further limiting parent contact daily. If more hours per day it will interfere with the bus schedule of departure and arrival of school children. I would request one day per week for teacher collaboration, parent visits and record keeping. Four days of four hours would be pre school.

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Please make clear what and when requirements are to be done. We had registration in February. AFTER registration it was decided the physical needed to be immediate not in August at start of classes. Now in May I have been informed that dental is going to be required. I do not like not knowing information with new parents.

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Sunday, June 03, 2007 1:50 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-06-03 13:50:00)

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Comment Received for Policy 2525

#####

Name: Brenda Riffe
Organization: Kanawha County Schools
Email: Briffe@kcs.kana.k12.wv.us
Title: Pre-K teacher w/ special needs
Address1: Lakewood Elem.
Address2: Penn. Ave.
City/State/Zip: St. Albans, WV 25177
Role: Teacher
Posted: 2007-06-03 13:50:00
Posted from IP: 75.108.200.187

Comments for section 126-(#)-1 General

My general concern is that as a WV Pre-k teacher with special needs, I can't begin to imagine having twenty children in my classroom with one assistant! I do not want to be liable or responsible for that number of children with the severity of special needs that I have had in the past. (Obviously, I need to read a copy of policy 2419.)

I like that normal developing five year olds will be served in the already existing program of Kindergarten! I think we need to stick to this in order to serve all four year olds.

Comments for section 126-(28)-(2) Guidelines

Changing the hours to 16 hrs per week seems a little impossible. Will we be going back to a five day weeks every week with no staff development or other training? I also am very concerned with the no planning period, no lunch and no time to enter our jots and observations into the CC net. Spending weekends and evenings doing this redundant paper work and planning has cost us many teachers again this year. WV Pre-K is the greatest thing we have done for education!

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Sunday, June 03, 2007 7:50 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-06-03 19:49:38)

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Comment Received for Policy 2525

#####

Name: Kathy Chapman
Organization: Berkeley County Schools
Email: kechapma@access.k12.wv.us
Title: pre-kindergarten teacher
Address1: 630 Winchester Ave.
Address2:
City/State/Zip: Martinsburg, WV 25401
Role: Teacher
Posted: 2007-06-03 19:49:38
Posted from IP: 151.205.152.175

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

In section 3.148 Regarding program availability: While it is important to provide as much time as possible, I strongly disagree with increasing the minimum hours to 16 per week. Our county already operates our programs for four days per week for three hours each day. The day offers two back-to-back sessions with only one-half hour in between. During that 30 minute span, often parents are late picking up their children, need some of our time in regard to discussion of issues with their child, my aide and I must "set-up" for the next class and take our only break. On Mondays, the day with no classes, we work from beginning until end planning, preparing the materials for the next week, working with parent meetings or phone calls, attending IEP meetings, and we often are in training sessions particular to the Pre-k program. It has been suggested that if we are mandated to extend our hours to 16 that a substitute will be available to cover the class so that we can attend training ! or work with planning. I can't tell you how much disaster I see looming! Firstly, I am concerned with the overall decline of the quality of the program if the program is handled by a substitute unqualified to work with preschool children. Secondly, in our area there are not enough substitutes for employment, let alone qualified personnel. I urge you to reconsider the hours and leave them as they currently stand.

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

7.4 While it is difficult to attract, hire, and maintain qualified personnel, it is my professional opinion that it is important to maintain the high quality standard of adhering to hiring only those personnel who currently or are eligible to obtain Professional Licensing. Allowing some personnel to be employed under the Permanent Authorization for Community Programs will weaken the integrity and intent of the Universal Access to a Quality Education...emphasis on quality. I strongly urge reconsideration of this amendment.

Comments for section 126-(28)-(8) Health and Safety Requirements

As I understand 8.2, it is proposed that the ratio is 1:10 and when children with no IEPs are present the room capacity may go as high as 3:30? I urge the committee to first reconsider the 1:10 ratio and make it 1:9 which is more in accordance with NAEYC standards. The idea of 30 young children in one room, (even if it does meet the 1,050 square footage minimum, is absolutely horrifying to me. I have worked in many phases of early education for the past 18 years: from family child care, family facility child care, advisor to county child care, ACDS instructor, Head Start Inclusion teacher, and now county school system teacher. I have earned my Masters in Early Childhood and I can tell you one thing for certain: the more children in a facility, the less real interaction occurs other than custodial care. While this is not what theory suggests, this is what occurs in reality. I urge the committee to reconsider the proposal to allow 30 children and to take it a step farther and ! to amend the ratio to 1:9

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

13.3 It is important to set the time aside for staff to accomplish meaningful joint planning and I applaud the committee for considering this a worthwhile point. I do see large issues with accomplishing this if the program increases the minimum hours offered to the children from 12 to 16. Currently, in our program, 1 day is set aside, (normally Monday), to accomplish parent meetings, phone calls to parents, planning, training, IEP meetings, etc.

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

The following form is provided to assist those who choose to comment on Policy 2525: West Virginia's Universal Access to a Quality Early Education System. Additional sheets may be attached, if necessary.

Name: Judith Woods Organization: Webster County Schools

Title: Administrator

Street Address: 315 S. Main Street

City: Webster Springs, State: WV Zip: 26288

Please check the box below that best describes your role.

- | | | |
|--|--|--|
| <input type="checkbox"/> School System Superintendent | <input type="checkbox"/> School System Staff | <input type="checkbox"/> Parent/Family |
| <input type="checkbox"/> Principal | <input type="checkbox"/> Teacher | <input type="checkbox"/> Business/Industry |
| <input checked="" type="checkbox"/> Professional Support Staff | <input type="checkbox"/> Service Personnel | <input type="checkbox"/> Community Member |

COMMENTS/SUGGESTIONS
§126-(#)-1. General.
§126-(28)-(2). Guidelines.
§126-(28)-(3). Definitions.

§126-(28)-(4). Parent/Guardian Involvement and Family Support.

§126-(28)-(5). Attendance.

§126-(28)-(6). Collaboration and the County Plan.

§126-(28)-(7). Personnel Standards

The policy doesn't state anything about the two year AB teacher continuing his/her classes to become fully certified. We need to have some assurance that these teachers will have to pursue their 4 year certification and that the agency in which they work will help support that with reasonable timelines.

§126-(28)-(8). Health and Safety Requirements

§126-(28)-(9). Standards for Preparing Students.

§126-(28)-(10). Curriculum and Assessment.

§126-(28)-(11). Transition and Continuity

§126-(28)-(12). Inclusive Environments.

§126-(28)-(13). Staff Development and Training.

§126-(28)-(14). Program Oversight.

§126-(28)-(5). Financing.

§126-(28)-(16). Program Evaluation for Quality Improvement.

Please direct all comments to:

Cathy R. Jones, Ed.D
Office of Special Programs, Extended and Early Learning
West Virginia Department of Education
Capitol Building 6, Room 304
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-3741

Cathy Jones

From: Tammy Shirley [tjshirle@access.k12.wv.us]
Sent: Thursday, June 07, 2007 12:49 PM
To: ctrjones@access.k12.wv.us
Subject: policy 2525

It has come to my attention that policy 2525 is open for discussion due to some impending changes. These changes would not be put in place to better serve the students. Clearly they were thought up by some person who sits at a desk and spends little to no time in an actual classroom with preschool special needs students. Explain to me how having a substitute in the classroom on a regular basis is good for any student because the regular teacher is in IEP meetings that would usually be held on Mondays when students would not be in class. When are the meetings going to take place for new students and exiting students. How are staff members going to be able to attend mandatory trainings. (autism, cpi, cpr etc.) When are staff members going to have time to discuss strengths and weaknesses of children and modifications for these students to enable them to have successful school careers. These changes will take away from the students.

Thank you for your time and consideration

Roberta Payton

6/7/2007

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Thursday, June 07, 2007 4:29 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-06-07 16:29:02)

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Comment Received for Policy 2525

Name: Terry Riley
Organization: Morgan County Schools
Email: tjriley@access.k12.wv.us
Title: Director
Address1: 247 Harrison Ave
Address2:
City/State/Zip: Berkeley Springs, WV 25411
Role: School System Staff
Posted: 2007-06-07 16:29:02
Posted from IP: 168.216.151.56

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

The area of greatest concern with the proposed Policy revision is listed below:

"3.148. Minimum Program availability means offering each preschool class a minimum of 16 hours per week and a maximum of 28 hours per week during the school year calendar for no less than 108 instructional days per school year."

Morgan County currently offers six classrooms that meet for 3.5 hours per day four days a week for a total of 14 hours. This is in addition to one classroom that meets 6.5 hours per day based upon transportation needs. In 2007-08 we will actually expand to one additional half-time classroom with a new community partner.

To meet the new minimum hour standard, these classes would have to increase to four hours per day. This would total an eight-hour day for teachers which is a half-hour over their maximum required work day.

Options to meet this standard would be to only have all day classes, hire additional part-time staff to address extended day services or meet five days a week.

These options all would require increased costs to community partners and the school system and/or a reduction of services to students as fewer classrooms could be offered. Going to a five-day setting would also require additional staff or limit services to students. Currently this day is used to conduct Head Start required home visits and work with their home-based students. It is also used to provide required collaborative planning, transition planning with kindergarten teachers and other required training sessions without disrupting the educational process.

Maintaining the minimum hours at 12 per week would not preclude anyone from offering more services to meet the specific needs of their students. However, increasing the minimum

will have major impacts on larger counties and growth counties.

Morgan County is working hard to make Universal Pre-Kindergarten work for all parents and students. We currently go above and beyond by providing two additional hours per week. This proposed change could actually cause us to reduce services instead of allowing us to continue to expand our program.

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

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Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Thursday, June 07, 2007 4:19 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-06-07 16:19:05)

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Comment Received for Policy 2525

#####

Name: Gayle Neldon
Organization: WVU Dept. of Speech Pathology & Audiology
Email: Gayle.Neldon@mail.wvu.edu
Title: Hearing Clinic Coordinator
Address1: 805 Allen Hall
Address2: PO Box 6122
City/State/Zip: Morgantown, WV 26506
Role: Professional Support
Posted: 2007-06-07 16:19:05
Posted from IP: 157.182.15.60

Comments for section 126-(#)-1 General

Can this be correct? The hearing screening protocol is "seems to hear"? What a step into the dark ages of health care that is. Hearing loss is not an all-or-nothing disorder. Hearing loss exists in degrees ranging from normal through mild, moderate, moderately-severe, and severe to profound. At what point will the subjective screening protocol correctly identify children who need further evaluation? How will primary care physician's voices be standardized to make sure that all children with not normal hearing will be identified? Beyond degree of hearing loss, the configuration of hearing loss has to be considered. A flat configuration indicates that hearing loss is essentially the same across the frequency, or pitch, ranges. However a child with a low frequency hearing loss, or more commonly, a high frequency hearing loss could certainly "seem to hear" yet be at significant risk of poor academic success because although speech (the teacher's voice) may be perceived, it

may not be understood. In the case of high frequency hearing loss, the presence of background noise further confounds the difficulty hearing instruction.

I am aware of a hearing screening tool in one pediatrician's office in past years. The screening consists of a closed set of pictures with a decreasing intensity of spoken words that the child must point to. It seems at first like a good tool, however the recorded word list is not randomized in the sense that words may be repeated. Therefore, as a child identifies a word at a louder intensity, that picture is eliminated from the pool of potential words from which to choose. At the softer intensities, where identification would be most important for screening, the child may have a 50% or 33% chance of passing purely by chance.

I can certainly understand a rationale for one healthcare provider to be responsible for several medical/health related screenings. And I understand that in counties where a speech-language pathologist or audiologist is not available to do hearing screenings, school nurses may have to do them. However, this is not a territorial issue. There are certified audiometric technicians across the country who do industrial and other hearing tests and screenings and I support their work. But to replace audiometric screening with a "seems to hear" protocol is a step in the wrong direction, regardless of who is doing the screening.

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Thursday, June 07, 2007 1:57 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-06-07 13:56:34)

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This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 2525

#####

Name: Mary Jo Graham
Organization: Marshall University
Email: graham@marshall.edu
Title: Professor
Address1: School of Education
Address2: 1 John Marshall Drive
City/State/Zip: Huntington, WV 25755
Role: Community Member
Posted: 2007-06-07 13:56:34
Posted from IP: 206.212.24.101

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

I would add a definition of caseload used in section 8.2. A caseload of 30--does this mean in different morning and afternoon sessions or does it mean a teacher can oversee two rooms with 15 children each at the same time?

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Research is tending to support the benefits of 4 year degrees on quality of classrooms. By allowing an associates degree for community programs, does this mean that children from low income homes or homes with working families will have lesser quality programs? It seems like this has the potential to set up a two tiered system. Shouldn't all children have highly qualified teachers? Also, if an RBA is going to be acceptable, a clear definition of what courses are required in the emphasis in early childhood would be important.

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Why do you include kindergarten standards with the WVLSFs and Head Start outcome measures? I'm concerned this wording would encourage teachers to insist upon including a kindergarten curriculum in their pre-k.

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

I have concern about the ECERS as the assessment--depending upon who is completing it and how it is being used. As a program evaluation only it may be helpful if it is administered by highly trained people. However, that has not been the case--teachers have been evaluated and some people administering the ECERS do not have a good understanding of what the various criteria mean. I would recommend that all ECERS evaluators must complete Modules I, II, III before going out! And then they be tested for interrater reliability. Continue looking for better assessments and perhaps pilot the CLAS to see if there is a better way of knowing how the programs operate.

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Monday, June 04, 2007 10:05 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-06-04 22:05:24)

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Comment Received for Policy 2525

#####

Name: Sara Winfrey
Organization: Wyoming County Schools
Email: swinfrey@access.k12.wv.us
Title: teacher
Address1: PO Box 97
Address2:
City/State/Zip: Mullens, WV 25882
Role: Teacher
Posted: 2007-06-04 22:05:24
Posted from IP: 72.64.22.177

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Parents should always have a choice regarding which agency provides their child's education at this critical stage of development.

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement



Please do not change the PreK Policy 2525 to require a minimum of 16 hours per week. I am a teacher for Berkeley county RESA VIII Head Start and currently teach 2 classes 4 days a week, 3.5 hours each. At Head Start, we pride ourselves in running a quality PreK program. The children are in the class for a minimum of 12 hours. The additional hours per week are needed for developing age appropriate quality lesson plans, entering creativecurriculum.net data (which requires a minimum of 6,000 entries per class), collaborative planning with fellows teachers, participating in required training related to PreK, and maintaining a collaboration with our families through home visits and parent teacher conferences.

A required 16 hours, would mean increase transportation cost because buses would have to operate 5 days a week. It would increase the number of substitutes needed because regular classroom staff would need to be pulled for creativecurriculum.net date entry and professional development and home visits and parent teacher conferences.

Please do not change the PreK policy 2525.

Brenda Diest

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Tuesday, June 05, 2007 8:21 AM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-06-05 08:20:45)

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Comment Received for Policy 2525

#####

Name: James A. Chapman
Organization: Myself
Email: jmchapma@access.k12.wv.us
Title: preschool special needs teacher
Address1: PALC
Address2: 3635 Winchester Ave.
City/State/Zip: Martinsburg, WV 25401
Role: Teacher
Posted: 2007-06-05 08:20:45
Posted from IP: 168.216.159.98

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

3.18 The increase of the hours will take away the time needed to plan, do the Creative Curriculum on the web. Also the time needed to meet with parents and do the evaluations and IEPs. Also the time added on will take away the time needed for 13.3 time set aside for joint planning.

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

8.2 How can there be 30 preschool children in one room when in the K classroom they can only have 20? Is this a full day program or is it two half day programs? What is the real number one can have in a class at one time? Is it 30 for the two half day programs or 60 for the two half days?

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

13.3 If you go back to 3.18 you have taken away the time for time to be set aside for joint planning. We can only work so many hours in one week. Teachers are to work 7 1/2 hours a day and aides only 7. Not only do we need time for joint planning but also time for parent meetings and doing the Creative Curriculum.

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

From: i12teachabcs@comcast.net
Sent: Thursday, May 31, 2007 11:37 AM
To: ctrjones@access.k12.wv.us
Subject: 16 hour class week

Dear Cathy,

Hi, I am a teacher with the RESA VIII Headstart program in Berkeley Co., and have worked with the program for 14 years, and I have always been proud of our program and the educational experience we have provided to the children we serve. That is why I feel compelled to comment on the state proposal of 126-28-3 to increase the minimum hours to 16. I would like to point out that if the in class time is increased the teacher planning time and record keeping time will decrease. This would not allow the teachers the time to prepare lesson plans and enter assessment data adequately. I think the time teachers spend planning and preparing lesson plans is vital as this time sets the tone of the entire learning experience for the child. I believe we need to focus on the quality of the educational experience and keep education separate from child care. If we take away the time teachers spend assessing the child's progress and planning for the child's academic experience then we are not going to deliver a developmentally appropriate, educationally sound program. I understand that some programs would be able to meet this minimum hour requirement however, for a program like ours we would have to reduce the number of children we serve. The increase would also put more demands on our budget for transportation of the children. Please keep the best interest of the children in mind when proposing changes.

Thank you for your time and attention, Kelly Miller

**Cathy Jones**

From: Jack & Jill [jackandjillpreschools@yahoo.com]
Sent: Tuesday, June 05, 2007 3:54 PM
To: ctrjones@access.k12.wv.us
Subject: Comments on Policy 2525

Dear Cathy,

As a new private daycare provider for the Pre-K program in Berkeley County, we have several concerns about the changes in Policy 2525. Although the 2007-2008 academic year will be our first year of participation, we feel that we have now invested enough time in becoming acquainted with the program to understand the effect that some of these changes may have.

Comments on:

' 126-(28)-(3)

3.18

The increase in the minimum number of hours per week required from 12 to 16 will have several detrimental effects. After meeting with some of the current Pre-K teachers, they seem to already be over-extended in terms of available time to complete all of their professional responsibilities. The enormous amount of CreativeCurriculum.net data that must be entered for each student is extremely time-consuming. Having partial day programs allows teachers to accomplish this and many other administrative tasks on Mondays. With a shortage of teachers in this area, we are concerned that we will have even more difficulty hiring qualified, dedicated teachers. It is understandable that most teachers interested in Pre-K would decide to take on a classroom without the burden of even more "take home" work.

Additionally, we are concerned that an increase in classroom hours would prohibit the necessary teacher training hours. We would not be able to provide qualified day-to-day substitutes for teachers needing to be out of the classroom, if training has to occur during classroom days.

As a private daycare partner offering Pre-K at both of our facilities, we are also worried about the increase in the number of meals that would have to be served. We operate on a very tight budget and schedule. Changing the times would cause a conflict in getting meals served to all of our different age groups as well as having sufficient space for each age group, which include before and after school age children.

Many of our parents have also expressed concern about an increase in the number of hours. While they are pleased that a rigorous academic program from the state is being offered, they feel that their four year-old children are not ready for a full day of school work, as many still need rest or nap time.

With all of these concerns in mind, we do not think that an extension of hours would be beneficial. Berkeley County has been able to create and operate a high-quality WV Universal Pre-K program. We hope to maintain that level of educational availability to our community and do not feel that may be possible with an increase in required hours. We are concerned that these changes are being proposed because other counties around the state are not able to comply with current standards.

Thank you very much for your time and would look forward to working with the state and Berkeley

6/7/2007

County to operate the highest quality of Pre-K education.

Sincerely,

You snooze, you lose. Get messages ASAP with AutoCheck
in the all-new Yahoo! Mail Beta.

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Tuesday, June 05, 2007 9:43 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-06-05 21:43:23)

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Comment Received for Policy 2525

#####

Name: Jennifer Dieter
Organization: Berkeley County Schools
Email: jdieter@access.k12.wv.us
Title: Secretary
Address1: 210 Care Bear Drive
Address2:
City/State/Zip: Martinsburg, WV 25401
Role: Service Personnel
Posted: 2007-06-05 21:43:23
Posted from IP: 71.168.49.236

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

As a secretary I see the work that goes into preparing and setting up testing to the special needs pre-k program. The teachers and staff need to have Mondays to allow time for meeting with the children to evaluate them. If the the hours are increased there would not be adequate time to evaluate the students. The teachers would not be able to have ample time to do there preparation needed for these students. There would be an impact on the training that is required and would not allow time to do so. Transportation will be affected by the change in hours as well as the cost. Other programs located in the buildings would be affected with traffic difficulties and parking issues. Changing to a full day program to meet the hours increase would affect the students because we would not be able to serve as many students as we are currently able to serve. I believe that it is in the best interest of all involved that the preschool hours stay the same and not be increased so tha! t we can continue to provide our students with the best education and be able to meet the specific needs that are required for our students.

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Wednesday, June 06, 2007 8:48 AM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-06-06 08:47:46)

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Comment Received for Policy 2525

Name: Lora Crowell
Organization: Berkeley County Schools
Email: lcrowell@access.k12.wv.us
Title: School Nurse
Address1: 457 Tanbridge Drive
Address2:
City/State/Zip: Martinsburg, WV 25401
Role: Professional Support
Posted: 2007-06-06 08:47:46
Posted from IP: 168.216.135.255

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

8.6 (p. 17) states - "Children that are not fully immunized, may be enrolled...but may not enter WV Pre-K classrooms until they have received the first series of shots." In other words, they can attend if shots are not current for their age.

126CSR5.2.1 (p.5) states - "All children entering pre-K, K, and WV school for first time must have immunizations and show proof." This clause does not mention that they can attend class if they have had the first series.

This is confusing because we do not allow kindergartners entering school for the first time to attend class until ALL shots are age-appropriate and current. (DTP-3doses; Polio-3doses; MMR- 2 doses). However, we are going to allow Pre-K students to attend as long as they have had the first of their series of shots.

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Cathy Jones

From: Tammy Shirley [tjshirle@access.k12.wv.us]
Sent: Thursday, June 07, 2007 9:01 AM
To: ctrjones@access.k12.wv.us
Subject: policy 2525 comments

I am writing in response to making the pre-k program a 5 day a week program. If this policy passes, a substitute will be needed at the very minimum 2 days a month. Monday's are used to plan for the week, enter multiple notes in cc.net, trainings, IEP development, testing new students, face to face meeting with birth to three and meeting with parents. There is no possible way I can continue to test new students, write IEP's, comply with IEP's and manage the paperwork for creative curriculum. This policy is not in the best interest of the children we serve and it is certainly not in the best interest of the staff who serve them.

Thank you for your time,
Tammy Shirley

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Wednesday, June 06, 2007 12:03 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-06-06 12:03:16)

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Comment Received for Policy 2525

Name: Penny Olmstead
Organization: Brooke county Pre-School
Email: bpcmolmstead@aol.com
Title: EISE
Address1: RD3 Box 610 Bruin Drive
Address2:
City/State/Zip: Wellsburg, WV WV 26070
Role: Teacher
Posted: 2007-06-06 12:03:16
Posted from IP: 168.216.247.172

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

I have concerns that increasing the hours to 16 hours per week. Being a 5-day program and servicing an a.m. and p.m. class, to meet the requirements students will need to be in attendance 3.25 hours per week (3 hours and 15 minutes). We barely have time for lunch and no time for prep or collaboration. Who will monitor this?

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Thursday, June 07, 2007 11:43 AM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-06-07 11:42:45)

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Comment Received for Policy 2525

Name: Andrea Campbell
Organization: Concord University
Email: acampbell@concord.edu
Title: Assistant Professor
Address1: Marsh Hall 104-A
Address2: Concord University
City/State/Zip: Athens, WV 24712
Role: Teacher
Posted: 2007-06-07 11:42:45
Posted from IP: 74.43.240.3

Comments for section 126-(#)-1 General

In regards to ECERS-R, it maybe helpful if consistent language is used in terms of "evaluator or observer". On p.4 evaluator is used, p.6 observer is used, and on p.33 observer is used

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

Comments for section 126-(28)-(8) Health and Safety Requirements

A caseload of 30 children is scary!!!

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement

Our state is fortunate to have Policy 2525. It is a great policy for ensuring quality for our children. I would like to see more accountability with Policy 2525 that includes county, school, or teacher consequences for failure to implement the policy.

Cathy Jones

From: Tammy Shirley [tjshirle@access.k12.wv.us]
Sent: Thursday, June 07, 2007 11:44 AM
To: ctrjones@access.k12.wv.us
Subject: policy 2525



I am a special education aide with the Berkeley County Schools and I would like to comment on the policy 2525.

It is my understanding that under this new policy you would like to add additional hours to the pre-k program. This will

make it virtually impossible to maintain records for cc.net as well as make it difficult to prepare for daily activities as

written for the creative curriculum. Many of these children need work adapted to meet their needs. There is so much

that goes in to working with special needs students on top of socialization skills. If the policy changes, the classroom

will be without the regular teacher a minimum of two days a month and four days during exit meetings. Aides will need

to have coverage to attend specialized training sessions. Where is the additional money coming from to pay for substitutes. Items will not be sanitized on a regular basis due to lack of time. Please take these concerns into consideration when voting on this new policy.

Julia Dopson

126CSR28

POLICY 2525: West Virginia's Universal Access to a Quality Early Education System**COMMENT PERIOD ENDS: June 11, 2007****COMMENT RESPONSE FORM**

The following form is provided to assist those who choose to comment on Policy 2525: West Virginia's Universal Access to a Quality Early Education System. Additional sheets may be attached, if necessary.

Name: Michelle Seidel Organization: The Mustard Seed

Title: Director

Street Address: 101 W. Martin Street

City: Martinsburg State: WV Zip: 25403

Please check the box below that best describes your role.

- | | | |
|---|--|---|
| <input type="checkbox"/> School System Superintendent | <input type="checkbox"/> School System Staff | <input checked="" type="checkbox"/> Parent/Family |
| <input checked="" type="checkbox"/> Principal | <input type="checkbox"/> Teacher | <input type="checkbox"/> Business/Industry |
| <input type="checkbox"/> Professional Support Staff | <input type="checkbox"/> Service Personnel | <input type="checkbox"/> Community Member |

COMMENTS/SUGGESTIONS

'126-(#)-1. General

'126-(28)-(2). Guidelines.

Comments/Suggestions on 126-28-87 Personnel Standards

In reviewing the revisions recommended for Staff Requirements I feel they are not giving Early Childhood Educator's who have worked extremely hard to receive an Associates Degree a chance. For Example:

1. I am 31 years old and I graduated for Delaware Technical & Community College in 1993 with an Associates Degree in Applied Science- Early Childhood Education Technology-Early Childhood Development. It took me five years to receive my Associates Degree in addition to working two jobs just to put me through school. I was unable to receive assistance through the school because I lived at home. When I received my degree I was told I could work with any children Kindergarten and under. This is the age group I like the most. I felt I wanted to get out there and start helping children instead of continuing my education towards a Bachelors Degree. I taught Pre-k for 10 years prior to becoming a Center Director and now I'm not even qualified to teach the age I adore unless it's a private pre-k. I know there are many pre-k teachers who would love to work for the school system and have Associate Degree. Why are they not getting the chance to teach? Specially, when there are not enough teachers to cover the upper grades.
2. I have a staff member who has just completed the Apprenticeship Program through WV, Department of Labor. She would like to continue her Education and receive an Associates Degree in ECE. She has been teaching Pre-k for over 8 years and has an excellent program. I feel she would make a great asset to your Pre-K program and would like to support her in her Journey by providing the Berkeley County with a space for her classroom when she graduates with an Associates Degree next year. If the changes go through I will not be able to give up the space because it's her classroom which would be given to the Pre-K program and I don't want to lose an excellent teacher.

I appreciate your time in reviewing my comments and I feel people with Associates degrees would make great Pre-k teachers for this program. If you have an questions feel free to contact me at (304) 263-9291.

Sincerely,



Michelle Seidel

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Thursday, June 07, 2007 12:16 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2007-06-07 12:15:36)

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Comment Received for Policy 2525

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Role: School System Staff
Posted: 2007-06-07 12:15:36
Posted from IP: 168.216.89.207

Comments for section 126-(#)-1 General

Comments for section 126-(28)-(2) Guidelines

Comments for section 126-(28)-(3) Definitions

Comments for section 126-(28)-(4) Parent/Guardian Involvement and Family Support

Comments for section 126-(28)-(5) Attendance

Comments for section 126-(28)-(6) Collaboration and the County Plan

Comments for section 126-(28)-(7) Personnel Standards

7.7 In theory I agree that all teachers should be eligible for a full WVDE early childhood teaching certificate. Unfortunately for community day programs this may prove to be an impossibility. In a rural area such as ours 4-year degree people are often hard to find. If there proves to be a glut in the teacher market the community program may be able to snare such a person for 1 maybe even two years, but they will leave that work situation ASAP for a job in the public school system due to increased salary and benefits. Where does that leave them? On the other hand there are people who are interested in no further education than the associate degree and are wonderful teachers. In a rural area such as ours working full time and taking classes can be nigh unto impossible. Glenville is less than 2 hours away but after working 8 hours with children 3.5-4 hours of driving is a large barrier and that works ONLY if the college is offering a needed class in the evening! Perha! ps we need some articulation agreements with higher ed if this provision

is to stick,

Comments for section 126-(28)-(8) Health and Safety Requirements

8.7 This appears to not be finished, as there is a colon at the bottom with no list of special required instructions. 8.1.8 In some public schools we must share with other classes and grades; not always possible to go into the bathroom with the boys; teachers always stand outside the door; I assume this would be classified as "supervision."

8.22 Outdoor activity. Is it possible for some language to be added about going outdoors for a reasonable amount of time in colder weather if the children are adequately clothed? I took the children who wanted to and had boots, snowpants, mittens, etc. out to play in the snow. For some of them this was their only opportunity to get out and have this experience. We even kept a closet of used/donated boots, snowpants, etc. for those children who did not have adequate outdoor clothing.

Comments for section 126-(28)-(9) Standards for Preparing Students

Comments for section 126-(28)-(10) Curriculum and Assessment

Comments for section 126-(28)-(11) Transition and Continuity

Comments for section 126-(28)-(12) Inclusive Environments

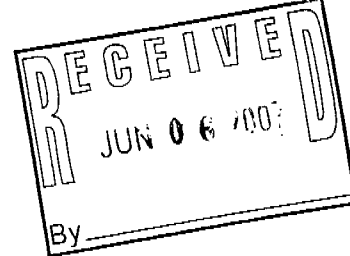
Comments for section 126-(28)-(13) Staff Development and Training

Comments for section 126-(28)-(14) Program Oversight

Comments for section 126-(28)-(5) Financing

15.5.2 Until there is a change in the reimbursement rate for meals in collaborative day care centers many will operate at a deficit.

Comments for section 126-(28)-(16) Program Evaluation for Quality Improvement



126CSR28

POLICY 2525: West Virginia's Universal Access to a Quality Early Education System

COMMENT PERIOD ENDS: June 11, 2007

COMMENT RESPONSE FORM

The following form is provided to assist those who choose to comment on Policy 2525: West Virginia's Universal Access to a Quality Early Education System. Additional sheets may be attached, if necessary.

Name: Doug Hennen Organization: _____

Title: Parent (mother)

Street Address: 194 MORNINGSIDE DR.

City: FALLINGWATERS State: WV Zip: 25419

Please check the box below that best describes your role.

- School System Superintendent School System Staff Parent/Family
- Principal Teacher Business/Industry
- Professional Support Staff Service Personnel Community Member

COMMENTS/SUGGESTIONS
<p>' 126-(#)-1. General.</p>
<p>' 126-(28)-(2). Guidelines.</p>

' 126-(28)-(3). Definitions. AS A parent of a 4yr old in the pre-k program this year, I thought the 3 hours for 4 days was perfect for her. It introduced her to the routine of school & still allowed her to be a "child". I would not have entered her in the program if it were full day!

' 126-(28)-(4). Parent/Guardian Involvement and Family Support.

' 126-(28)-(5). Attendance.

' 126-(28)-(6). Collaboration and the County Plan.

' 126-(28)-(7). Personnel Standards

' 126-(28)-(8). Health and Safety Requirements
I am apposed to the full day for pre-k. - As the program stands at 1/2 day, you are able to teach 40 children. By changing classes to full day, you cut the class to 30 children. I would have lovely been dissappointed if my daughter would have been 1 of the 10 cut from the program!

' 126-(28)-(9). Standards for Preparing Students.

Ms. Sharon Phillips has been wonderful! How Blessed we were to have her as 36 our daughters teacher!

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' 126-(28)-(5). Financing.
' 126-(28)-(16). Program Evaluation for Quality Improvement.

Please direct all comments to:

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