

WEST VIRGINIA
SECRETARY OF STATE

BETTY IRELAND

ADMINISTRATIVE LAW DIVISION

Form #5

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2005 JUL 15 P 3:32

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 _____

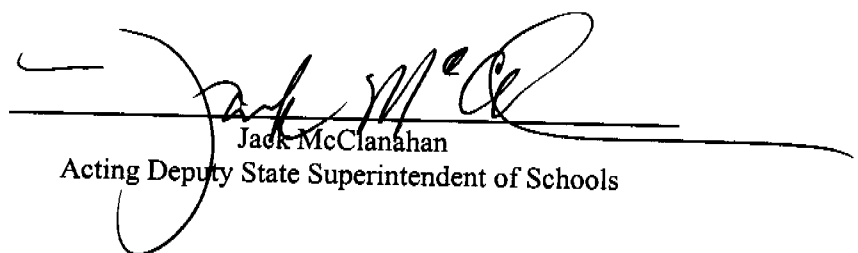
IF YES, SERIES NUMBER OF RULE BEING AMENDED: 28

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 14, 2005.


Jack McClanahan
Acting Deputy State Superintendent of Schools

**EXECUTIVE SUMMARY
FOR
WEST VIRGINIA BOARD OF EDUCATION POLICY 2525**

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

Background:

- The revised WVBE Policy 2525 was placed on public comment until June 15, 2005.
- The comments were reviewed by Dr. Cathy R. Jones, Early Childhood Coordinator, in collaboration with Bill Huebner, Head Start State Collaboration Director, and Ann Nutt, WVDHHR.

Major Revisions

- Comments were received from 19 individuals (including one senator), one LEA, two associations, and the West Virginia Department of Health and Human Resources (WVDHHR). Secretary Martha Walker (WVDHHR) submitted comments after the deadline. All of her issues had been considered previously.
- Comments related to seven major areas:
 - Certification for teachers
 - Health and Safety, especially immunizations, classroom square footage and playgrounds
 - Development of a procedure manual
 - Use of the Early Childhood Environmental Rating Scale (ECERS)
 - Monitoring of public school classrooms
 - Schedule for plan submission
 - Transportation
- The concerns were address as follows:
 - Certification language is aligned with WVBE Policy 5202.
 - Health and Safety
 - Immunization schedules will follow W.Va. Code §16-3-4 since all WV Pre-k children are enrolled in public school even when they are in collaborative settings.
 - Classroom square footage has been clarified based on the recommendations of the National Association for the Education of Young Children and in response to public comments.
 - Language was added to reflect the need for age appropriate equipment on playgrounds for preschoolers.

- Development of the procedure manual will include input from the Head Start Collaboration Director and WVDHHR as requested.
- Use of the ECERS-R was more clearly defined.
- Language was added regarding the role of OEPA in monitoring WV Pre-k classrooms.
- The schedule for plan submission was reverted back to the original language as requested in several comments.
- Transportation is not a mandated service for pre-k.

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FILED

TITLE 126
PROCEDURAL RULE
BOARD OF EDUCATION

2005 JUL 15 P 3: 32

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 15, 2005

1.4. Effective Date. - - August 14, 2005

1.5. Repeal of former rule. This is a revision of WV 126CSR28, West Virginia Board of Education Policy 2525, West Virginia's Universal Access to Early Education System (hereinafter Policy 2525), filed January 13, 2003 and effective February 12, 2003.

§126-28-2. Guidelines.

2.1. WV Pre-k classrooms shall:

2.1.1. be voluntary and based on the choice of the parent or guardian.

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

2.1.3. utilize developmentally appropriate curriculum and a learning approach based on scientific research about how children learn.

2.1.4. provide the building blocks for literacy.

2.1.5. view children within the context of their family.

2.1.6. utilize state approved curricula and assessments that are compatible with the state approved curricula, as tools for measuring the child's progress on the continuum of development and individualizing educational opportunities.

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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.

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.

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 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), parent contributions, funds provided by the School Building Authority of West Virginia, funds under the Individuals with Disabilities Education Improvement Act of 2004, and any other private or public funds.

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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 (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. Approved WV Pre-k participating programs can be counted in the school aid funding formula and 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 whose services are supported by two or more partners and benefit all children enrolled in the collaborative classroom. The partnership shall include at a minimum the LEA and Head Start or child care or another community early childhood provider.

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

3.7. *Contracted provider* shall mean any provider 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.

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.

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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 or whose enrollment is mandated under state and/or federal law. Three year old children can be included in collaborative classrooms if they meet the eligibility requirements of this policy or, in a collaborative classroom, the guidelines for enrollment of the collaborative community partner. If it is in the best interest of the child, as determined by mutual agreement between the teacher and parent/guardian, the child may remain in the program for longer than one year. Because WV Pre-k is designed to prepare children to be successful in kindergarten, children may not be excluded based on developmental delays including toilet training. Children who are five prior to September 1 shall be enrolled in kindergarten, instead of WV Pre-k, unless the teacher and parent deem kindergarten placement for that child not in the best interest of the child. For children who have been enrolled in a WV Pre-k classroom, determination to provide the child with an additional year of pre-k will be documented through the county/classroom assessments of the child using the county/classroom adopted comprehensive assessment system.

3.13. *Local Education Agency (hereinafter LEA)* means the county school system as the administrative entity for each county.

3.14. *Minimum program availability* means offering each preschool class a minimum of 12 hours per week during the school year calendar.

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

3.16. *Procedure manual* refers to the manual WV Pre-k classroom faculty, administrators, and staff shall use for implementing the requirements of this policy. A representative from Head Start and WVDHHR will provide input into the development of the procedure manual in order to ensure proper consideration for child care licensing and Head Start Performance Standards.

3.17. *Responsible adult* means a parent, staff member, or other adult whom the parent has designated to drop off or pick up the child.

3.18. *Staff/child ratio* means a fraction in which the numerator is one qualified staff member or substitute, and the denominator is the maximum number of children that the qualified staff member is permitted to supervise.

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

3.20. *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.

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3.21. *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.

3.22. *Use zone* means the surface under and around a piece of equipment onto which a child falling from or exiting from the equipment is expected to land.

§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.

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, West Virginia Board of Education 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.

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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. The West Virginia Department of Education (hereinafter WVDE), in collaboration with the West Virginia Department of Health and Human Resources (hereinafter WVDHHR), has the responsibility of convening a committee to review the quality and content of the county plans. Three people will be appointed to represent the WVDE. Additionally, the WVDE will request that the Secretary of WVDHHR appoint three people and the Head Start State Collaboration Director appoint three people to participate on this review committee. The committee will make recommendations to the Secretary of WVDHHR and the West Virginia Board of Education (hereinafter WVBE) regarding approval of the county collaborative plans. Each county board of education must submit a county plan (an original and three copies) to the Secretary of WVDHHR. 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.

6.2. Once the county plans are reviewed by the collaborative review committee and the signature of the Secretary of WVDHHR is secured, a list of the county plans and the recommendations of the review committee will be submitted to the WVBE for approval. If a county plan is not approved, it will be returned to the county board of education with an explanation and instructions for re-submission. The LEA plan county contact shall share this information with the county collaborative and superintendent upon receipt.

6.3. 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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6.4. 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 30 days prior to the implementation of the changes. Failure to do so will negatively impact the approval status of the county collaborative plan.

6.5. 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.

6.6. 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.

6.7. The county collaborative team shall annually assess the composition of the county collaborative team and may 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, 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 that work with young children and their families providing support and education.

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6.8. Development of the county plan through the county collaborative planning team must utilize an existing early childhood collaborative unless there is no such collaborative in that county.

6.9. 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. In collaborative classrooms where community partners have regulations such as the Head Start Performance Standards or WVDHHR Day Care Licensing, these regulations shall apply in addition to WVBE Policy 2525. 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. The county collaborative plan must include documentation by each participating partner of his or her role in the development of the county collaborative plan.

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

6.12. 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 Early Childhood Coordinator by July 15 of that year.

§126-28-7. Waivers.

7.1. The WVBE may grant a county board a waiver from full implementation of WV Pre-k in a county if the WVBE finds that all of the following conditions are met:

7.1.1. the county does not have sufficient facilities available; or

7.1.2. the county does not have and has not had available funds sufficient to implement the program; and

7.1.3. the county has not experienced a decline in enrollment at least equal to the total number of students to be enrolled; and

7.1.4. other agencies have not made sufficient funds or facilities available to assist in implementation.

7.2. A county seeking a waiver must apply with the supporting data to meet the criteria for which they are eligible on or before March 25 for the following school year.

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7.3. The State Superintendent of Schools shall notify the county that the requested waiver was denied or granted on or before April 15 of that same year.

§126-28-8. Personnel Standards.

8.1. Teachers must hold a qualifying certification/endorsement, specifically, a teaching certification/endorsement in early education, elementary education with a Pre-k/K endorsement, Preschool Special Needs or birth through pre-kindergarten.

8.2. A Full-Time Permit shall be issued and valid for one school year and shall expire on June 30. An educator employed on or after the first day of January may be issued a Permit valid until June 30 of the following year. All requirements for the Professional Teaching Certificate must be completed within five years of the original issuance of the Full-Time Permit. See WV 126CSR136, WVBE Policy 5202 - Minimum Requirements for the Licensure of Professional/Paraprofessional Personnel and Advanced Salary Classification, Section 15. A Full-Time Permit will be issued for the following:

8.2.1. persons with degrees in elementary education, child and family studies with an emphasis on early childhood education, or child development and have 25% of the required coursework for one of the qualifying certifications as defined by the higher education institution in which they are enrolled, or

8.2.2. persons with a Board of Regents degree with a specialization in early childhood/child development who are employed by a community program and have 25% of the required coursework for one of the qualifying certifications as defined by the higher education institution in which they are enrolled, or

8.2.3. persons with an Associate's Degree in child development/early childhood or occupational development with an emphasis on child development/early childhood and one year of early education teaching experience who are employed by a community program and have 25% of the required coursework for one of the qualifying certifications as defined by the higher education institution in which they are enrolled.

8.3. 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.

§126-28-9. Regulation of Facilities.

9.1. Recognizing that all children within WV Pre-k should be in safe and healthy environments, and that all of the collaborative partners within the WV Pre-k have rules and

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regulations governing various aspects of their programming, this policy sets forth a core set of common health and safety standards that must be adhered to in addition to any existing rules and regulations based on funding sources for individual programs. Public school classrooms will be monitored as a part of the Office of Education Performance Audits county auditing process in addition to daily supervision by county and school level administrators. Classrooms operated by or in collaboration with Head Start will also be monitored for compliance with the Head Start Performance Standards. WV Pre-k classrooms shall use the Procedure Manual to ensure compliance with this section of the policy. Classrooms operated by or in collaboration with licensed child care or private preschool programs must also meet the child care licensing standards, under WVDHHR Day Care Licensing, 78CSR1.

9.2. WV Pre-k classrooms shall limit classroom size to no more than twenty children per classroom. Ratios shall be maintained at one adult: ten children with one adult being a certified teacher. Exceptions to the staff/child ratio may cover groups of children who participate in WV Pre-k classrooms and participate in a naptime program. At least one staff member is in the classroom supervising the children. An additional staff member must be readily available at all times.

9.3. 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 WV 126CSR440 2520.15 Early Learning Standards Framework Content Standards and Learning Criteria for West Virginia Pre-kindergarten (hereinafter the WVELSF); 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.

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

9.5. 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. Programs operating less than four hours will provide a snack as prescribed by the WVDE Child and Adult Care Food Program. Meals shall be served in a setting that encourages socialization, where the children and staff members are seated together when eating, and staff members provide supervision and encourage positive eating habits.

9.6. 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.

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9.7. All children entering an approved participating WV Pre-k program shall be screened for impairments or delays in hearing, vision, speech, language, development, and dental health. Programs shall adhere to the deadlines as prescribed by their primary funding source (providing 51% or more of the funding for that year). Programs operated by the county board of education shall adhere to W. Va. Code §18-5-17.

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

9.9. 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;

9.10. 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:

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

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

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

9.10.4. 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.

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

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

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

9.11.3. 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;

9.11.4. 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;

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

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

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

9.11.8. permitting a child to discipline other children;

9.11.9. punishing an entire group for the actions of a few children; or

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

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

9.12.1. the definition of child abuse and neglect, and

9.12.2. 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.

9.13. 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.

9.14. 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.

9.15. 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.

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

9.17. 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.

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9.18. A WV Pre-k classroom shall meet the rest needs of the pre-k children through

9.18.1. provision of a designated area where a child can sit quietly or lie down to rest;

9.18.2. establishment of a schedule for children who are in WV Pre-k programming for more than four daytime hours that includes a regular nap period of at least one hour each day for the child who sleeps, and an opportunity for rest and quiet play in a designated part of the room for children who do not nap. Children who are not napping should be engaged with quiet materials or activities such as books, quiet table toys, or computers.

9.18.3. provision of appropriate sleeping equipment that does not allow children to sleep on the floor or in a sleeping bag or on linens alone.

9.19. When children participate in WV Pre-k programming for more than (4) daytime hours, weather and circumstances permitting, a WV Pre-k classroom shall provide a minimum of one (1) hour of outdoor activity daily as a part of the curriculum, on days when the temperature is forty (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 WVBE Policy 2520.15. Programs operating less than four hours per day must have 30 minutes of daily outdoor activity, weather permitting.

9.20. A WV Pre-k classroom shall have on file upon enrollment a record of a health assessment signed by the child's licensed health care provider that includes any special required instructions for the WV Pre-k classroom, including:

9.20.1. a description of any allergy, current health problem or condition that may affect the child's adaptation to care, including abnormal results of screening tests, for vision, hearing, tuberculosis, or lead poisoning;

9.20.2. prescribed daily medications and any potential side effect, and

9.20.3. the child's health history, including, as applicable, information about a serious illness or significant communicable disease, an injury that required medical attention or hospitalization, a previous surgery, or a history of prematurity.

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

9.22. Staff members shall adopt universal precautions when exposed to blood and body fluids that might contain blood.

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9.23. 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:

9.23.1 when hands are contaminated with body fluids;

9.23.2. before preparing, handling or serving food, or setting the table;

9.23.3. after toileting, handling diapers or assisting a child with toilet use;

9.23.4. before and after eating meals or snacks;

9.23.5. after handling pets or other animals;

9.23.6. before giving medication;

9.23.7. after playing outdoors;

9.23.8. after handling garbage; and

9.23.9. after removing protective gloves used for any purpose.

9.24. 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.

9.24.1 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.

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

9.25.1. 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;

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

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

9.25.4. if it is attached to a building, that the barrier or fence provides at least two (2) exits from the play area, including one (1) exit that is at a distance from the building;

9.25.5. 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

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

9.26. 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.

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

9.26.2 Children transported by a school bus who attend a pre-k classroom and are not yet enrolled in kindergarten will sit in a designated area of the vehicle.

9.26.3. 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.

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

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

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

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

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

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

9.28. Regarding passive media, a WV Pre-k classroom shall ensure that:

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

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9.28.2. when passive media is used, that staff members are available to support the use of it by discussing what is viewed with the child;

9.28.3. when television programs and movies are used, the contents are designed to benefit the child, viewing time is limited and the child who does not wish to watch has a choice of other activities; and

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

9.29. 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.

§126-28-10. Standards for Preparing Students.

10.1. The WV Pre-k classroom must implement the Policy 2520.15, the WVELSF, 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.

§126-28-11. Curriculum and Assessment.

11.1. 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.

11.2 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.

11.3. Comprehensive curricula systems, curriculum enhancements and comprehensive assessment systems will be approved following a process similar to the process established by

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the West Virginia Department of Education, including, preschool special education, for adoption of instructional materials using the PIECES Advisory Council and appropriate subcommittees.

11.4. A comprehensive curricula system must at a minimum meet the following standards:

11.4.1. 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.

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

11.4.2. 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.

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

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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.

11.4.4. 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.

11.4.5. 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.

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.

11.4.6. 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.

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- 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.

11.4.7. 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.
- g. providing daily rest times for children in programs operating more than four hours/day and allowing non-nappers to engage in quiet activities.

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

11.4.9. 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.

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

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

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11.4.12. 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.

11.5. 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.

11.5.1. 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

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h. art, and/or

i. music.

11.6. 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.

§126-28-12. Transition and Continuity.

12.1. 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:

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

12.1.2. 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.

12.1.3. 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.

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

12.1.5. 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.

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

12.1.7. To the extent possible, 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.

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§126-28-13. Inclusive Environments.

13.1. 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.

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

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

§126-28-14. Staff Development and Training.

14.1. A collaborative professional development plan for providing a minimum of 15 hours annually of staff development will be included in the county collaborative plan and be based on a professional development needs assessment, the Core Knowledge/Core Competencies for Early Care and Education Professionals which can be found at www.wvearlychildhood.org, and including a minimum of six hours of education on issues related to young children with special needs.

14.2. Professional development opportunities will follow the West Virginia State Training and Registry System (WV S.T.A.R.S.) training process which can be accessed at www.wvearlychildhood.org.

14.3. Every WV Pre-k teacher and assisting staff including aides, assistants, and paraprofessionals, must complete a total of 30 hours of training based on the comprehensive curriculum and assessment systems and the Policy 2520.15, the WV ELSF, over a 24 month period and provided by the employer or made accessible through the professional development section of the county collaborative plan. Thirty hours is the minimum. Teachers and assisting staff may choose to take a college credit bearing course based on the West Virginia curriculum/assessment standards in lieu of this requirement.

§126-28-15. Program Oversight.

15.1. 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.

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

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15.3. On or before December 1, 2004, and each year thereafter, the WVBE shall report to the Legislative Oversight Commission on Educational Accountability.

§126-28-16. Financing.

16.1. 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.

16.2. If programs are a part of the collaborative county plan and provide education services to eligible children that can be counted in the county school aid funding formula, those services must be provided at no cost to the parent/guardian of the children. . In collaborative settings, WV Pre-k is considered an enhancement to the program and parents shall not be charged additional costs for the enhanced services. All instructional activities, such as field trips, will be at no additional cost to the parents/guardians.

16.3 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 program is approved the Secretary of the WVDHHR and the WVBE.

§126-28-17. Program Evaluation.

17.1. Beginning with the school year 2004 which, all participating classrooms shall use the Early Childhood Environment Rating Scale-Revised (hereinafter ECERS-R, Harms, Clifford, and Cryer, 1998) as a guidance tool to evaluate the programs success in meeting the needs of the children. 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. Areas identified for improvement will be addressed in the subsequent year's county collaborative plan.

17.2. The ECERS-R ADF that is sent to the WVDE Early Childhood Coordinator shall be performed by collaborative teams that include at least one program/county administrator or outside evaluators. 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 WV 120CSR142 WVBE Policy 5310 Performance Evaluation of School Personnel.

17.3. Programs will be assessed using the ECERS-R by a qualified outside evaluator 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.

17.4. 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

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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 to the WVDE Early Childhood Coordinator by July 15.

17.5. 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
5/2/05

AGENCY
West Virginia Department of Education

AUTHORIZED REPRESENTATIVE


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

COMMENT LOG

June 15, 2005

Date	Individual/ Organization	N: No Response	-: Negative N/A	+: Not Accepted	+: Positive A:	Accepted Action/ Type	0: Neutral
			Comments/ Suggestions				Rationale
5/23/05	Ann Sammons, Sch. Nurse Raleigh Co. Board of Ed annsammoms@charter.net		§ 126-28.9.21. I believe pre-k students should follow the same guidelines and laws as students in grades K-12 (reference WV Code 16-3-4). There should also be reference to the fact the school nurse cannot legally delegate medication administration and/or other specialized procedures to head start staff. The school nurse can only delegate to BOE staff. Staff will need to be sure a trained staff member accompanies the student on field trips.				
5/24/05	Beth S. Brown, Teacher Pre-K Spec. Needs Teacher Grant Co Schools bshbrown@access.k12.wv.us		§ 126-28.9.5 WVBE Policy 2419 is not clear on the ratio for a preschool classroom of 20 children, 10 who are exceptional with IEPs. What are the maximum and minimum for children and staff? § 126-28.9.20 A minimum of 1 hour of outdoor play when a program is more than 4 daytime hours can amount to almost 25% of the day in outdoor play, almost 25% nap period (9.19.2), and almost 25% for meals (9.6), leaves only 25% for the meat of the curriculum of a preschool (not a daycare). Provisions for gross motor activity is vital, but only addressed for outdoor play. Since there are a significant number of days of inclement weather, indoor gross motor activity should also be addressed. This may be an issue for the size of many facilities.			A/+	Added language from WVBE Policy 2419 Outdoor play is a time for intentional learning and a part of the three curriculum frameworks.
5/26/05	Mary Jo Graham, Professor Marshall University graham@marshall.edu		§ 126-28.8 I have read through Policy 2525 and find it to be quite comprehensive and well developed. I have one area of concern. Under recognized professional licenses in West Virginia there are two that are listed. One is Birth - Pre-K which is called preschool education and the other is Pre K - K which is called Early Education. Another area listed is Early Childhood Education which is identified as K-4. The policy should use the language of the WVDE and under 8.1 it does not. Preschool Education (Birth - Pre-K) and Early Education Pre-K - K are the only two certifications that indicate Pre-K in their title and therefore to not be on permit an individual should have one of these two certifications. A third area that lists Preschool ages in the certification is called Preschool Special Needs (Pre-K - K). Allowing this certificate to be accepted is potentially problematic. In some institutions, students do not receive courses in typical development and in setting up environments/curriculum for typically developing children. This puts teachers in a position of not being prepared to create classrooms that meet the needs of all students. It would be wise to have the teacher's transcripts looked at to be certain that their coursework supported their work with typically developing children and, if not, create some professional development opportunities for these teachers.			A/o	Aligned with WVBE Policy 5202
5/26/05	Jane Hanger, Teacher Terra Alta/East Preston School jhanger@access.k12.wv.us		§ 126-28.9 I feel the classroom ratio of 20 to 1, teacher with assistance is too high. After over 20 years in kindergarten I can testify that the actual number of children present in the classroom, even with adequate numbers of adults			N/-	This ratio meets national standards, Head

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

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June 15, 2005

Date	Individual/ Organization	Comments/ Suggestions	Action/ Type	Rationale
5/26/05	Rebecca King, Coordinator Office of Student Serv. & Health Promotion rlking@access.k12.wv.us	<p>does have an impact on program delivery. The increase in noise, distraction, waiting time due to this number of children can be a problem in kindergarten and will be more so as the age of the children decreases. The unnatural situation of large numbers of age similar children caused diminishing returns in learning. All other changes in Policy 2525 are welcome and appear appropriate. The number of children per classroom are my only concern.</p> <p>§ 126-28.9.7 Section 9.7. of Policy 2525 states, "All children entering an approved participating WV Pre-k classroom must have age appropriate immunizations as defined by the American Academy of Pediatrics within 30 days of enrollment". I commend the collaborative effort to make policy uniform for all agencies with pre-k programs. WV Code defines needed immunizations for children entering into WV Public schools. The interpretation of 16-3-4 would guide us to defining the law for pre-k pupils. The law states, "All children entering school for the first time in this state shall have been immunized against...". Does the first time refers to compulsory age or any age? It also states, "No child or person may be admitted or received in any of the schools of the state until he or she has been immunized...". I recommend the policy reflect current Wva Code 16-3-4 for any child in public schools or in outside pre-k agencies holding class in a public school building. As stated in Section 9.8 of the revised policy, "Programs operated by the county board of education shall adhere to Wva Code...". I feel that for immunizations it should state, "Programs operated by the county board of education or within the public school system shall adhere the Wva Code...". The issues that I foresee arising are as follow: 1. Children entering into the public school system or building without any immunizations. Currently pertussis is on the rise and has caused death to a 2 month old in Morgantown this year. Netherlands/Canada have seen an outbreak in Rubella. If children take home communicable disease to infant/toddler siblings it could result in death. 2. there will be massive confusion among school personnel in interpreting WV Code 16-3-4 and Policy 2525. the uniformity and compliance with current law will be lost. We currently deal with several issues related to immunizations and NCLB. 3. We currently to not have enough staff to keep up with so many different time frames, like 90 days after one series or 30 days after enrollment. I do not feel counties would be compliant with the policy. PS: Is there a fiscal note to cover Section 9.7 and 9.8? We must have more trained personnel for screenings and nursing staff for checking immunizations and training staff.</p> <p>§ 126-28.6.5 50 Percent of classrooms must be provided by community programs. The revised rule has substituted "must" with "should" with respect to phasing in community programs. Note: Some advocates are concerned that WVDE may eventually remove this rule entirely. If so, the</p>	A/+	Start standards, and exceeds child care licensing
5/27/05	Margie Hale, Exec. Director WV KIDS COUNT Fund margiehale@wvkiidscountfund.org	<p>§ 126-28.6.5 50 Percent of classrooms must be provided by community programs. The revised rule has substituted "must" with "should" with respect to phasing in community programs. Note: Some advocates are concerned that WVDE may eventually remove this rule entirely. If so, the</p>	6.5 A/o	Policy does say "must":

POLICY 2525: West Virginia's Universal Access to Early Education System
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Date	Individual/ Organization	Comments/ Suggestions	Action/ Type	Rationale
		state would not maximize funding resources or provide pre-k settings most appropriate for families. § 126-28.6.10 Counties will no longer be required to list in their county plans all programs invited to participate. Note: counties should be encouraged to invite all interested parties as they develop their pre-k plan—and the public should know who has been invited. § 126-28.9.14 The requirement for a minimum of thirty-five square feet per child is included with the proviso that it may be “usable indoor space”. Note: We do not know how this will be interpreted, but with the curriculum that is required, there must be 35 square feet per child in the classroom, not “other usable” indoor space. § 126-28.16.3 The requirement to submit a report to the Legislative Oversight Commission on Educational Accountability and the joint committee on government and finance with which address at minimum: a summary of the county plans, an analysis of costs, an analysis of the impact of plans on counties with increased enrollment, and an analysis of the impact of the programs on the maximization of the use of federal funds for early childhood programs has been removed. § 126-28.16.5.3 the revised rule requires a report be submitted annually to the Legislative Oversight Commission on Educational Accountability but does not specify what the report should include and leaves out the requirement for the report to be submitted to the joint committee on government and finance. § 126-28.17.3 The words “trained” and “every five years” have been removed from the requirement to assess classrooms by an evaluator. Classrooms may now be assessed by qualified by not trained evaluators and not every five years but only if concerns arise. Note: The assessment instrument that is required is a highly sophisticated tool that requires fairly extensive training and a period of inter-rater reliability testing. Untrained reviewers will not provide the information needed to provide appropriate technical assistance. § 126-28.17.5 The requirement to track family satisfaction, program continuity and related variables in order to evaluate program impact HAS BEEN REMOVED. The proposed rule says that WVDE will track learner outcomes only. Note: A focus on learner outcomes only is a concern to early childhood experts since early education is about more than just “learner outcomes”.	N/A/-	Language is in 6.6 Changed to 35 sq feet of classroom space to support implementation of the approved curricular frameworks.
5/27/05	Joseph Smith, Teacher Wood Co Board of Education joesmith@yahoo.com	§126-28-11. The general statements directing curriculum read as to emphasize literacy and symbol identification and making letters in several curriculums. These are 3and 4 year old CHILDREN! The sensory, motor, and perceptual development to develop neural pathways for language acquisition skills need to be developed first. This occurs through various forms of actual physical movement of the entire body to strengthen the vestibular and proprioceptive systems of the body, which integrate sensory information from the body through the inner ear and the brain stem. The	N/A/o	Timelines as prescribed in law are past “qualified” assumes adequate training Language reinstated
				Cites research, not really comments that can be addressed through the policy or revisions

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

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	<p>teaching of symbols before CHILDREN are physical prepared with the sensory motor and perceptual skills being integrated before time and age appropriate experiences have been given to develop the brain causes processing in the wrong areas of the brain. **Movement and rhythm stimulate the frontal lobes and enrich language and motor development (Brewer & Campbell, 1991). Although these activities are helpful in preparing the brain for language, it should be noted that children should not be pushed to read early. Reading too early puts stress on the eyes and causes other potential damage. In Chris Brewer and Don Campbell's book, Rhythms of Learning, they state that emphasis on early acquisition of reading, writing, math and other symbol systems may actually cause children to develop awkward and inappropriate methods of understanding these symbols. If this information is given to a child before they are neurologically ready, it may just result in meaningless memorization. If this is done prematurely, it may process in the wrong region of the brain, which is not as beneficial as processing in the proper region. In Denmark, reading is not taught until the age of eight and their literacy rate is 100 percent. (Campbell, D. & Brewer, C. (1991). Rhythms of learning. Tucson, Arizona: Zephyr Press.) This means educators can be contributing to "learning differences" when this unnecessary STRESS is created in academic focused settings before CHILDREN are ready-physically and neurologically!! The National Association for the Education of Young Children (NAEYC) has the following standards for movement listed specifically in the National Standards: Physical Development and Skills 2.81 P-K Children have varied opportunities and are provided equipment to engage in large motor experiences that stimulate a variety of skills. enhance sensory-motor integration. develop controlled movement (balance, strength, coordination). enable children with varying abilities to have gross-motor experiences similar to those of their peers. range from familiar to new and challenging. help them learn physical games with rules and structure. 2.82 I-T Infants and toddlers/twos have multiple opportunities to practice emerging skills in coordination, movement, and balance and in perceptual-motor integration. to interact in an environment that allows them to move freely and achieve mastery of their bodies through self-initiated movement. 2.83 I-T Infants and toddlers/twos have multiple opportunities to develop fine-motor skills by acting on their environments using their hands and fingers in a variety of age-appropriate ways. 2.84 T-P-K Children are provided varied opportunities and materials that support fine-motor development. 2.85 P-K Children are provided tools and guided in their use in writing, drawing, art, and science activities. 2.86 T-P-K Children are provided opportunities and materials that increase their awareness of safety rules in their classroom, home, and community. 2.87 T-P-K Children have opportunities to practice</p>		
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	<p>safety procedures. 2.88 T-P-K Children are provided opportunities and materials that encourage good health practices, such as serving and feeding themselves, rest, good nutrition, exercise, hand washing, and brushing teeth.</p> <p>2.89 T-P-K Children are provided opportunities and materials to help them learn about nutrition, including sources of food and recognizing, preparing, eating, and valuing healthy foods. 2.90 P-K Children are provided opportunities to discuss, ask questions, and raise fears about visiting the doctor, clinic, hospital, or dentist; getting shots; or taking medicine. West Virginia is blessed with one of the nations most knowledgeable and leading child development researchers and curriculum designers in the United States at West Virginia University. Dr. Linda Carson has spent her career creating age appropriate practices for pre-k children and teaching educators in forums nationwide. I strongly urge the State Dept of education contact her and/or use her expertise for informing educators/county curriculum supervisors in creating age appropriate practices and assessments.</p> <p>http://www.ms.wvu.edu/2003_Releases/ware_professor.htm Childhood fitness advocate named Ware Distinguished Professor at WVU</p> <p>CONTACTS: Linda Carson, Ware Distinguished Professor, 304-293-3295, ext. 5276 Dana Brooks, dean, School of Physical Education, 304-293-3295, ext. 5285 The recipient of the first endowed professorship in West Virginia University's School of Physical Education plans to use her position to spread the message about childhood fitness – a growing national issue given the number of obese kids. Linda Carson, an associate professor and director of the West Virginia Motor Development Center, was named the Ware Distinguished Professor in a ceremony Monday, Feb. 10, in the Coliseum's Jerry West Mountaineer Lounge. The Ware Family Foundation established the professorship in honor of School of Physical Education alumni Alfred F. and Dolores Jamison Ware. "Statistics show that children are overweight but many are undernourished because of the food and activity they choose or the ones chosen for them," Carson said. "Statistics also show more children choose to be sedentary than active. I am privileged to bear the responsibility of the Ware professorship to try to reverse these trends and impact children's fitness in West Virginia." Carson has been a faculty member in the School of Physical Education for 22 years. Before that, she taught at Purdue University, Davis & Elkins College and New Jersey public schools. A native of Chambersburg, Pa., she has a bachelor's degree in health and physical education and a master's degree in physical education from Slippery Rock (Pa.) University and a doctorate in physical education with an emphasis on motor development from WVU. She started the Motor Development Center at WVU in the 1980s as a way of teaching motor skills and active lifestyles to infants, babies, toddlers, preschool and elementary school children. The center – a collaboration between the School of Physical Education and the</p>		
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Center for Excellence in Disabilities at WVU – includes such programs as ToddlerSkills for children ages 1-2, KinderSkills for youngsters ages 3-5 and FutureFit for children ages 6-11. U.S. Games, a sporting goods company, named the center a national demonstration and training site in 1999. Carson also developed the Choosy Kids Club, an after-school fitness education program for elementary school children in Monongalia and surrounding counties. Some 250 children meet twice a week at the Coliseum to learn the value of exercise, nutrition and being tobacco- and drug-free. Choosy, a green character with antennae and sunglasses, is the club's mascot. Club members have a pledge they recite, secret greeting and club songs. About 20 WVU students from various disciplines staff the meetings, gaining practical experience in teaching childhood fitness. It is the Choosy Kids Club that Carson wants to expand, using the Ware Distinguished Professorship as her bully pulpit. Her goal is to establish Choosy Kids Clubs in schools across the state and encourage adults to be equally choosy when making decisions on behalf of children. To this end, she is forming partnerships with the Department of Education; Office of Healthy Schools; West Virginia Bureau of Public Health; Office of Maternal, Child and Family Health; CARDIAC Project; the Prevention Research Center at WVU; Head Start; the Center for Excellence in Disabilities at WVU; and Forward Southern West Virginia.

"The Ware Distinguished Professorship is providing impetus for this new focus in the Motor Development Center," Carson said. "The WVU community and the state will benefit greatly by the generosity of the Ware Family Foundation, and we're so grateful for the family's interest in the well-being of children in the state." Linda Carson, the Ware Distinguished Professor in the School of Physical Education, helps Choosy Kids Club members Allison Lynch, 7, and Jack Goelner, 6, get fit on stationary bikes. (Click on photo for larger version) The Ware professorship is just the latest recognition of Carson's efforts on behalf of kids. She is the recipient of WVU's Outstanding Teacher Award, the Eugene M. Fuller Award for the Most Outstanding Recreation Programming in West Virginia and the PATCH Award for Outstanding Contribution to Community Well-being. She is also a consultant for a children's television program, "Bloopy's Buddies," which focuses on physical activity, nutrition and safety in preschool children. Dean Dana Brooks said Carson's credentials speak volumes for why she was selected for the professorship. "She is a nationally renowned physical education teacher educator," Brooks said. "The West Virginia Motor Development Center she runs has become a premier child development center in West Virginia and the region. Based upon her outstanding teaching and service, she is highly qualified for this distinguished professorship, and I'd like to thank the Ware Family Foundation for its support." Al Ware, the founder and chairman emeritus of

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	<p>Amherst FiberOptics, and Dee Ware, a former teacher, said Carson's teaching emphasis on healthy lifestyles melds with their own philosophy of well-being. "With Dr. Carson's development of the Motor Development Center, we know that when children are exposed to physical activity early in their lives, they tend to continue those activities throughout their lives," Ware said. "Today, with high obesity rates among children, it's obvious we need more emphasis on health, physical activity and lifestyle changes." Also the West Virginia Motor Development Center can be located on the web at http://www.wvu.edu/~physed/mdc/about.htm The National Association for the Education of Young Children (NAEYC) National standards should be utilized to revise and align the West Virginia CSO's for this entire document. Language Development and this important time of child development but much of the National standards are related in exposure to letters rather than mastery of sophisticated and abstract comprehension of literacy and language for academic higher order thinking skills. 2.21 P-K Goals and objectives for children's acquisition of language align with the program philosophy and consider family and community perspectives. 2.22 U Curriculum guides teachers to value and support children's oral and written communication in a language their family uses or understands. 2.23 U Children have varied opportunities to develop competence in verbal and nonverbal communication by responding to questions; communicating needs, thoughts, and experiences; and describing things and events. 2.24 T-P-K Curriculum guides teachers to support alternative communication strategies for children who are nonverbal. 2.25 U Children have varied opportunities to develop vocabulary through conversations, experiences, field trips, and books. 2.26 P-K Children have varied opportunities and materials that encourage them to have discussions to solve problems that are both interpersonal and related to the physical world. 2.27 P-K Children have varied opportunities and are provided materials that encourage them to engage in discussions with one another. Early Literacy Development 2.28 P-K Children have varied opportunities to be read books in an engaging manner at least twice daily in full-day programs and at least once daily in half-day programs in group or individualized settings. be read to in individualized ways including one to one or in small groups of two to six children regularly explore books on their own and have places that are conducive to the quiet enjoyment of books. have access to various types of books including storybooks, factual books, books with rhymes, alphabet books, and wordless books. be read the same book on repeated occasions retell or reenact events in storybooks. engage in conversations that help them understand the content of a book. be assisted in linking books to other aspects of the curriculum. identify the parts of books and differentiate print from pictures. 2.29 I Foundations for early literacy are developed by</p>		
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	<p>building on infants' enjoyment of songs, rhymes, routine games, and books by engaging infants in individualized play that includes simple rhymes, songs, and interactive games (e.g., peek-a-boo). planning daily opportunities for each child to hear and respond to various types of books including picture books, wordless books, and books with rhymes making different types of durable books available for children's independent exploration. 2.30 T Foundations for early literacy are developed by building on toddlers'/twos' enjoyment of books, songs, rhymes, and routine games by engaging in these activities on an individualized basis. planning daily opportunities for each child to hear and respond to various types of books including picture books, wordless books, and books with rhymes making different types of durable books available for children's independent exploration providing opportunities and materials for toddlers'/twos to begin exploring and learning about painting, drawing, and scribbling helping toddlers'/twos understand that pictures represent real things in their environment engaging toddlers'/twos in individualized play that includes simple rhymes, songs, and sequences of gestures (e.g., finger plays, peek-a-boo, patty-cake). 2.31 T-P-K Children have activities that allow them to become familiar with print. Teachers help children recognize print and connect it to spoken words. Children have opportunities to make sense of environmental print in their classroom. Some materials are labeled, and print is used to describe some rules and routines. Items belonging to a child are labeled with his or her name. Children are actively involved in making sense of print. Children have opportunities to become familiar with, recognize, and use print that is accessible throughout the classroom. 2.32 K Children have varied opportunities to learn to read familiar words, sentences, and simple books. 2.33 P-K Children have multiple and varied opportunities to write: Writing is embedded into art, dramatic play, and various center activities, and writing materials are readily available for use in these areas. Children have daily opportunities to write or dictate their ideas. Various types of writing are supported, including scribbling, letter-like marks, and developmental spelling. Children are given the support they need to write on their own including access to the alphabet (e.g., displayed at eye level or on laminated cards) and printed words about topics of current interest. Children are provided needed assistance in writing the words and messages they are trying to communicate. Children see teachers model functional use of writing and are helped to discuss the many ways writing is used in daily life. 2.34 K Each child is encouraged to write independently each day. 2.35 P-K Children are regularly provided multiple and varied opportunities to develop phonological awareness: They are encouraged to play with the sounds of language including syllables, word families, and phonemes using rhymes, poems, songs, and finger plays. They are helped to identify letters and the</p>		
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	<p>sounds they represent. They are helped to recognize and produce words that have the same beginning or ending sounds. They are supported in their self-initiated efforts to write letters that represent the sounds of words. 2.36 P-K Children are given opportunities to recognize and write letters. 2.37 K Children are encouraged to identify phonemes in words through varied activities, including writing and games. 2.38 P-K Books are displayed and writing is encouraged in one or more areas of the classroom. With the NAEYC Standards available and Dr. Carson as a West Virginia University Resource along with retired educators available (Dr. Sallie Plymale-Marshall University retired, and Mother of Senator Robert Plymale), This entire document should and could be revised/aligned to reflect age appropriate specifics before being adopted as policy.</p>		
<p>6/1/05 Carroll Staats, Board Member Jackson Co. Schools staatsc@charter.net</p>	<p>§126-28-1 A delegation of preschool teachers appeared before our board to express their concern about the amount of paperwork they are being required to do because of the requirements of policies 2525 and 2419. They have requested to have Friday of each week to perform the required paperwork thus eliminating one day of classes for preschool students each week. Please review the policy and study possible changes to reduce the required paperwork. We do not want to lose 20% of the class time for preschool students. §126-28-11 Based on comments by our preschool teachers and special education director, there is an extraordinary amount of paperwork required for assessment. Please find a way to make it reasonable.</p>	<p>N/A -</p>	<p>25 hr/week is 1 FTE The assessments are formative and should drive classroom instruction and individualization. Program structure is a local decision not dictated by the policy.</p>
<p>6/2/05 Brenda Isaac, RN Kanawha Co. Schools Isaacrn@aol.com</p>	<p>§126-28-9.7 Children should be required to have at least one of each required immunization prior to entering school. It is not safe to allow a completely unimmunized student into the setting for even 30 days. 9.21 To keep children healthy and safe the health information should be on file prior to the student's enrollment. Health conditions that would impair learning should be dealt with and a health care plan in place before the student starts school. To do otherwise would jeopardize that student's health and perhaps even endanger his/her life. In some instances, other students could also be jeopardized. For example, a student with a life threatening allergy or some other life threatening condition should have everything in place prior to entering school. This would include all physician orders and an emergency care plan.</p>		
<p>6/14/05 Kay Tilton ktilton@wvwdhr.org Ann Nutt annnutt@wvwdhr.org Melanie Clark melanieclark@wvwdhr.org WVVDHHR Div of Early Care and Ed.</p>	<p>§126-28-3.5 Collaborative Setting Clarification is needed for what qualifies as a partner, this impacts percentage of collaborations with community partners in Section 6 and needs to indicate that at least one partner is a community program.</p>	<p>A/-</p>	<p>Adding language in 3.5 to reflect the requirement that the collaborative</p>

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	<p>§126-28-3.16 Procedure Manual It is of concern that this is not available for review and comment with the Policy as it impacts expectations for implementation. Recommend that this be developed collaboratively with all partners and that language be added to the policy to insure this process.</p> <p>§126-28-6.1 Collaborative partnerships would be better served if the wording for this was revised to: § The West Virginia Department of Education, in collaboration with the WV DHHR, has the responsibility of convening K. i. This role of the WVDHHR is supported in SB 247. ±126-28-6.2 Language regarding sharing county plan feedback with collaborative team should be strengthened to indicate a requirement. „ ±126-28-6.3 This reflects a change from an annual plan to a plan submitted every two years. The time frame change impacts state level ability to track collaboration and phase in efforts for community programs. The WV DHHR takes its role in insuring collaboration with community partners seriously. Perhaps a complete plan every two years is adequate, but a briefer update and progress report regarding collaboration and community partnerships must be submitted on the alternate years. At a minimum, an interim report, signed by all partners, with specific progress in collaboration as well as any areas of concern from the approved plan would strengthen implementation efforts.</p> <p>§Viable: partners needs further clarification/definition as well as support to county planning team determination of viability of specific potential partners. ±126-28-6.4 Inclusion of the need to submit changes to the plan is supported and a helpful addition to the policy. However, any changes to the plan that impact partnerships and/or the quality of educational services offered should all be submitted with signatures from the collaborative partners, not just changes that impact funding. X-±126-28-6.5 Continued expectation for 50% of the classrooms for eligible children provided through contractual agreements with community programs is affirmed and essential for the success of the WV Pre-k program. §Counties should phase in classrooms incrementally to meet the requirement for universality by 2012-13. i. §Should: implies an option to delay use of community programs until 2012-13. This is detrimental to community partners whose business/ or funding may have been negatively impacted in the interim years. An expectation of phase in throughout the upcoming years is critical for communities and early childhood providers to work and plan in an effective collaborative fashion. X-±126-28-6.11 This seems a little confusing on when</p>	<p>A/+</p> <p>A/+</p> <p>A/+</p> <p>A/+</p> <p>A/+</p> <p>N/+</p> <p>N/o</p>	<p>beat a minimum between LEA and Head Start, child care, or other community provider.</p> <p>Language added</p> <p>Change made</p> <p>Language added</p> <p>Reverted to old language and remove "or are not viable partners."</p> <p>Language changed</p> <p>Language is shall not should</p>
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	<p>or why a county should submit - this may need clarification regarding the whens and whys. Does there need to be anything further here about what happens re: plans etc. X±126-28-8.2 Language should add the allowance of a waiver or other alternative if the 25% is not met. It is important to insure community program staff have opportunities to use their skills and increase their education. Other options should be identified in the policy to insure continued participation by community program staff. X±126-28-8.3 All staff in an early childhood classroom must have training regarding children, their development and ways to support optimal development. Reducing educational expectations of aides seems to be a disservice to the integral role all adults play in providing quality educational experiences. Some additional education should be expected.</p> <p>X±126-28-9.2 Further clarification is needed in this section regarding licensure of Head Start programs that fall under the WV/DHHR Day Care Licensing. 78CSR expectations for licensure based on hours of operation.</p> <p>X±126-28-9.8 Continued expectation for screening children is affirmed, thereby enabling the early identification of health and /or developmental concerns.</p> <p>X±126-28-9.14 A definition of "suseable" space is critical as a part of the policy to insure that actual classroom space provides a minimum of thirty-five (35) square feet of indoor space per child. This is a minimum requirement in order to support developmentally appropriate curriculum and to insure that children's time is spent in quality learning experiences.</p> <p>X±126-28-9.26 Inclusion of the expectation of fenced playground areas is affirmed in order to protect children's safety.</p> <p>X±126-28-11.1 - 11.3 At this time there is not a list of approved enhancements. Suggest striking curriculum enhancements in 11.1 (and consider implications of strike in 11.3), as 11.2 further describes their selection and use.</p> <p>±126-28-14.1 and 14.2 Continued inclusion of the use of the West Virginia State Training and Registry System (STARS) training process and the Core Knowledge/ Core Competencies for Early Care and Education Professionals is affirmed as another opportunity to connect and coordinate all early childhood programs.</p> <p>126-28-16.2 Careful consideration must be given to the removal of the provision that services be provided at no cost to the parent/guardian with the proviso that WV Pre-k services are considered an "enhancement;" and no charge will be made for the enhanced services. In some areas of the state, in particular small, rural communities, this has the potential to negatively impact child care center viability. If parents are offered the option of several full days at no cost in a public school setting vs. payment of child care fees but no additional charge in a center, centers are placed at an unfair</p>	<p>A/+</p> <p>N/o</p> <p>N/-</p> <p>N/+</p> <p>A/+</p> <p>A/-</p> <p>N/o</p> <p>A/o</p>	<p>Language added</p> <p>DHHR matter. Awaiting legal interpretation</p> <p>Changed see comments from Margie Hale</p> <p>Words removed</p> <p>Further clarification and continued guidance needed</p>
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		<p>disadvantage. Careful consideration of maximizing resources vs. supporting equitable partnerships must be further explored.</p> <p>X₁±126-28-17.1 Continued expectation of the annual use of the ECERS-R as a guidance tool for classroom evaluation is affirmed in recognition of its significance in achieving quality learning environments. This section could be strengthened by noting an expectation for use of the ECERS-R to develop continuous quality improvement plans.</p> <p>X₁±126-28-17.5 It would be most beneficial to West Virginia's children and families if a system of research was developed in collaboration with all partners and track all variables related to quality early education experiences.</p>	A/+	<p>Language added re: use of ECERS-R</p> <p>Language reinstated</p>
6/14/05	<p>Patricia Gracey Head Start Technical asst. Specialist Caliber Associates Reg. III, ACF Pat-gracey@comcast.net</p>	<p>§126-28-15 The policy must have a procedure for questioning and commenting on the implementation of the approved county plans. The policy must have a grievance procedure that addresses and remediate actions when county partners do not comply with the approved county plan.</p>	A/-	<p>Language added in section 15</p>
6/15/05	<p>L. Kay Carpenter, Superintendent Webster Co. Schools 315 S. Main Street Webster Springs, WV 25288 lois@access.mountain.net</p>	<p>§126-28-5.3--County attendance policies should include requirements of 2525. Have county's attach their policies or better require attendance policies to be on file and reviewed during OPEA audit...less paper work.</p> <p>§126-28-.9.7 = See letter sent to County Superintendents from Lisa Burton on June 8, 2005 concerning enrollment of student's without immunizations..</p>	N/A/o	
6/15/05	<p>Candis Clark, School System Staff Deborah Novotny, Spec. Ed Dir. Wetzel Co. Schools 333 Foundry Street New Martinsville, WV 26155 cancclark@access.k12.wv.us dnovotny@access.k12.wv.us</p>	<p>§126-28-9.3 Need to clarify "qualified" staff</p> <p>9.4 For all new staff or all staff annually?</p> <p>9.9 Needs to be reworded to avoid lawsuits</p> <p>9.14-9.15-9.16--Existing school facilities were not built to preschool regulations(other children use the same facilities--No monies available to build new facilities. We need to be regulated by our own existing regulations.</p> <p>9.19.3 Provide opportunities, not mandates.</p> <p>9.22 Notify families should be sufficient. 9.26-9.26.5--School facilities have their own regulations that they need to adhere to. Other children of varying ages utilize the facilities.</p>	A/+ A/+ N/A/- N/A/-	<p>Removed word qualified and added clarifying language</p> <p>Facility requirements based on national standards and aligned with WVBE policy 6200</p> <p>Notify families added</p>
6/15/05	<p>Stella Moon, Exec. Director</p>	<p>§126-28-13.1 It appears that by providing fully inclusive early childhood classrooms' would violate PL 94-142 and State Board Policy 2419 by not offering a full continuum of placements to meet individual needs.</p> <p>§126-28-6 Please maintain that 50% of the classrooms for eligible children</p>	N/o	<p>No conflict with state policy or federal law</p>

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	<p>Wood Co. Family Resource Network 914 Market Street, Suite 304 Parkersburg, WV 26101 woodcountyfrn@zzzip.net</p>	<p>must be contracted with qualifying providers in collaborative settings. Wood County is blessed with quality child care centers who are willing to collaborate. The public school system makes collaborating difficult and continually reminds the Wood County Pre-K Collaborative Committee that they are the only entity outside of Head Start that has money to fund the Pre-K Program. Secondly, a county school representative would like to limit participation by the community to the six mandated representatives. The county collaborative representation should be strengthened to include those six representatives plus at a minimum three additional representatives from the optional representative list; thus having nine required signatures/partners. This would enable "neutral" partners to have a vote (signature would be required on plan) since the child care, Head Start and parent representatives, at times, are hesitant to voice an opinion contrary to the public school system. In Wood County, we have a well-established Early Childhood Coalition that has worked well together for years. One of Wood County Schools' representatives has made it difficult to collaborate, refused to use the Partnership Application approved by the Collaborative Committee, and sometimes over rules the Committee's decisions or recommendations. This has created friction on the Pre-K Collaborative Committee and has unfortunately reaffirmed the perception that a huge, governmental entity uses bully tactics to get its way.</p> <p>§126-28-9 The public school classroom should be held to the same child care licensing standards as a licensed child care/Head Start center. Allowing the public school system to set its own standard is not in the best interest of the child. Typically public school classrooms are smaller and the lack of space does not lend itself to being as child friendly as the licensed centers' classrooms. Secondly, by changing the policy, a double standard is being established, thus reducing the level playing field and further hindering collaborative efforts. What applies to one entity will not apply to another entity.</p>		
6/15/05	<p>Lena Rapp, Head Start Dir. Nicholas Comm. Action Partnership 1205 Broad Street Summersville, WV 26651 lrapp@ncapwv.org</p>	<p>§126-28-3.16 When will the procedure manual be available? It would be effective to have practitioners of Head Start, Pre-school and Child Care involved in this process. It would also be helpful to have "front line" administrators involved in the development of this manual</p> <p>3.19 – I believe the definition of "staff member" should not include people who are not compensated for their service.</p> <p>§126-28-4.1.1 I believe their needs to be meaningful documentation to prove these face-to-face conferences occur. Wording such as "the face-to-face conferences must be documented outlining what was reviewed and concerns the parent/guardian may have".</p> <p>§126-28-6.3 – I think it is important to keep reviewing and revising plans</p>	<p>see comments above</p> <p>A/+</p> <p>A/+</p> <p>see above</p>	<p>Not feasible due to conflict with state law and WVBE policies. Public Schools are exempt from that law.</p> <p>Language changed</p> <p>"documented" added</p>

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	<p>every year.</p> <p>6.4 – remove the word “negatively”. This is too subjective.</p> <p>6.5 – Thank you for maintaining the 50% existing resources requirement. This is helpful. It is bothersome to see the word “portion of money generated by the formula” as it relates to ensuring the requirements of the policy are met. We have seen that implementing preschool services is expensive and we must ensure that these funds are used to appropriately supply these classrooms and to make them a safe learning environment. I would like to see all funds generated by the formula for preschool be directed to the provision of services in these classrooms.</p> <p>6.7 – Community Action should be capitalized instead of “community action”.</p> <p>6.9 – What will be the recourse if these standards are not met (Head Start Performance Standards and Child Care Licensing).</p> <p>6.12 – I would request that the due date for the annual contract be June 30th of each year rather than June 1. All partners are very busy at the beginning of the month of June with closing centers, completing inventories and closing out books. We are also just seeing what enrollment will look like for the following year and must have this information before submitting a contract.</p> <p>§126-28-6-9 Thank you for incorporating these requirements. Although this is good to see this in the policy, I am deeply concerned about monitoring for the policy requirements. We need to see a defined frequency of monitoring visits by OEPA. I would like to see a frequency of once every two years. I would like to see inclusion of collaborative partners in this process (interviews with Head Start Directors, Child Care Directors, who ever is involved in the administering of services). Principals need to be informed clearly that these classrooms fall within their responsibility of ongoing monitoring. OEPA needs to inform the administrators of the issues found and corrective actions to take. OEPA must be trained and use the same tool when monitoring pre-k sites across the state. Will they be utilizing the ECERS? Is there a standard tool they use when monitoring schools? Can we be assured that there will be special considerations when monitoring pre-k classrooms since the programming is different than for k-12? Without clearly defined frequencies, tools used and consequences for non-compliance, collaborative partners are operating on very unstable ground. This could be a consequence to a collaborative partner that falls outside the control of a program but still are held responsible by their own funding source. I understand that this will take additional funding to ensure regular, frequent monitoring (once every two years). This is why I don't understand why the state can not utilize an existing resource: DHHR Licensing Specialists. Another resource that could be used is the Head Start PRISM</p>	<p>A/+</p> <p>N/+</p> <p>A/+</p> <p>N//o</p> <p>A/+</p> <p>A/+</p> <p>A/o</p>	<p>Change made</p> <p>Noted</p> <p>Issue not governed by policy Date changed to 7/15</p> <p>Working with OEPA and the training manual to insert language re: WV Pre-k and possible members of the review team with ECE expertise</p>
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	<p>(Program Review Instrument for Systems Monitoring) report. Head Start grantees are monitored at a minimum of every three years. The resulting report could possibly be forwarded to OEP, Department of Education and local Boards of Education to ensure accountability.</p> <p>9.7 – I would like to see additional wording that states “within 30 days of enrollment or a plan in place”. This is due to situations of some low income families who have not had their children immunized on a regular schedule and therefore may be behind on some inoculations. We must insure that our most at risk children are receiving high quality services in these classrooms and are not excluded for a fault of a parent or guardian.</p> <p>9.8 – “Programs shall adhere to the deadlines as prescribed by their primary funding source (providing 51% or more of the funding for that year).”. This statement leads to some confusion. In 6.9 it states “In collaborative classrooms where community partners have regulations such as the Head Start Performance Standards or WVDHHR Day Care Licensing, these regulations shall apply in addition to WVBE Policy 2525.”. I realize this section addresses screenings but I believe that some people will take this out of context and apply it to another section of the policy. It is also hard to operate under different timelines. Maybe wording such as: “most stringent requirement will be followed”.</p> <p>9.27.3 – An additional staff person should be used on buses transporting four year old children.</p> <p>§126-28-10.1 Thank you for keeping “Children shall be assessed on their individual developmental progress along the developmental continuum.” This is very important and I would expect everyone will be monitoring for this.</p> <p>§126-28-11.2 I think “extended periods of sitting” needs to be defined. No more than twenty minutes.</p> <p>11.6 – Stick turning seems to be a widely used practice of managing behaviors in pre-k classrooms and therefore warrants this to be identified in this section with the other inappropriate practices cited</p> <p>§126-28-16.2 – I feel this section needs to be elaborated on. Teaching staff are in the habit of requesting parents to purchase supplies at the beginning of the year. Language that addresses this may need to be added. Adding an additional sentence between the first and second that states “Program staff shall not request parents/guardians to purchase supplies nor provide money for field trips or other services”.</p> <p>§126-28-17 I think the use of the ECERS-R is very good. We must ensure we have reliable, consistent evaluators. I don't see an outcome for an “unfavorable” ECERS-R evaluation. My understanding is that an improvement plan must be submitted to the state Department of Education. Can this be included in this section in some way? Can a system be</p>	<p>N/o</p> <p>N/o</p> <p>N/+</p> <p>A/o</p> <p>A/o</p> <p>A/+</p> <p>N/-</p>	<p>Transportation is not a mandated service</p> <p>Will be addressed in the procedure manual</p> <p>Language added</p>
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	<p>implemented that includes the review and signing by collaborative partners of the report that is sent to the state?</p>		
<p>6/15/05 Sharon Meadows, Head Start Dir. Raleigh Co. Comm. Action Association PO Box 3066, EBS Beckley, WV 25801 sharon@rcca.org Teresa Hicks, Child Dev/Ed Coordinator Raleigh Co. Comm. Action Association PO Box 3066, EBS Beckley, WV 25801 teresa@rcca.org Becky Gooch-Erbacher, Exec. Director WV Head Start Association 170 Chapel Road Wheeling, WV 26003 wvhsa@1st.net Elizabeth Marquart, Executive Director WV Community Action Association</p>	<p>§126-28-2.1.6 – “state approved” curricula... We would like to interject the ongoing role of PIECES and the appropriate subcommittee(s) in the approval process for curricula, assessments and curricula enhancements. §126-28-3.1 – We would like to suggest changing “...playing video games...” to “...playing developmentally appropriate video games...” 3.3 – We have a concern that including “parent contributions” as a potential source of funding could conflict with 126-28-16.2 where services are to be provided at “...no cost to the parent/guardian of the children...” 3.6 – We believe that children should be supervised by “paid” staff only. 3.7 – “...and has a contractual agreement...” appears twice. 3.9 – We affirm the inclusion of “...in cooperation with the county collaborative team...” in this statement as a message to the community that the county plan is intended to be a product of collaboration, not the possession of and individual agency in the community. 3.12 – We feel that a statement needs to be included which clarifies that 3 year old children can be included in collaborative classrooms as they meet the eligibility guidelines for the collaborating partners. - In addition, we believe that the decision to include 5 year old children in a WV Pre-k classroom must involve a process similar to that of deciding to provide a child an additional year of WV Pre-k (use of county/classroom assessments of the child, using the county/classroom adopted comprehensive assessment system) – not just based on a decision by the teacher and the parent. Also, in collaborative settings, collaborative partners need to be included in this process. 3.14 – “days” needs to be struck after “consecutive” - In addition, we affirm the retention of 12 hours as a reasonable minimum number of hours for program availability. 3.16 – We strongly recommend that PIECES and the appropriate subcommittee(s) be included in the development and approval of the WV Pre-k Procedural Manual in addition to the receipt of public comment. 3.19 – We believe “staff” should be paid staff, and/or “trained and qualified”. §126-28-5.1 – We recommend adding: “Once a child is disenrolled, re-enrollment may not be guaranteed, particularly in the case of collaborative settings.” §126-28-6.1 – We affirm the language that supports collaboration. Building a Pre-k system in each county must include a strong commitment at the local as well as the state levels to preserve and build upon all existing resources in our communities. This is particularly important to Head Start and providers</p>	<p>A/+ A/+ See above See above See above N/o N/+ A/+ N/+ A/+ A/+ N/o A/+ A/+</p>	<p>Noted in 11.3 Changed in 9.2.8.4 Typographical error corrected Language added Typographical error Language amended</p>

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	<p>of child care.</p> <p>6.2 – Last sentence is confusing. Also, we believe that the LEA county contact needs to be required to inform the county collaborative team and superintendent immediately. Perhaps: "It is the responsibility of the LEA county plan contact to share this information immediately with the county collaborative and the superintendent."</p> <p>6.3 – We believe submitting a plan every two years is problematic in that, in many communities, much still is to be done in the time remaining between now and 2012-13 in order to come into compliance with the law. In addition, if two years remains, a mechanism needs to be in place for approval by the local collaborative team and from the state level additions and/or changes to existing classrooms within the county WV Pre-k system. We are concerned about the term "viable" partners and who determines if a partner is not viable. At minimum, the county collaborative must jointly make such a determination and approve. We also believe that county collaborative teams should be required to meet a minimum of six times per year.</p> <p>6.4 – We believe that "...negatively impact..." is too subjective and the statement should be changed to read: "Any changes that will impact the maximization of federal and other available funds...."</p> <p>6.5 – We affirm the retention of 50% as the minimum for contracted community settings as a strategy for ensuring community participation and maximization of resources in the building of the WV Pre-k system. Fifth sentence that begins with "When the county school system includes the eligible children attending ina portion of the money generated by the formula...." We believe the term "portion" is too subjective and needs to be defined and/or a percentage specified. Within the discussion of the two associations on this matter, there was much debate on the appropriate percentage – individual programs will most likely offer comment on this issue... Last sentence "those" should be "these".</p> <p>6.6 - We suggest clarifying by adding: "...a licensed community child care program <u>representative</u> in that county...."</p> <p>6.7 – Change "is shall" in the first line to "shall". Also, is confusing as to whether the list of partners indicated is required or recommended. If recommended, the word "may" in the second line needs to be reinstated.</p> <p>6.9 – We affirm the inclusion of the language about Head Start Performance Standards and WVDHHR Day Care Licensing as this supports efforts within all agencies to comply with appropriate standards and regulations. We believe that a system for monitoring contracts at the state level for appropriate compliance should be required.</p>	<p>A/+</p> <p>A/+</p> <p>A/+</p> <p>A/+</p> <p>N/A</p> <p>N/A/o</p> <p>N/+</p> <p>N/o</p> <p>N/+</p> <p>N/A/-</p>	<p>See above</p> <p>See above</p> <p>See above</p> <p>See above</p> <p>See above</p> <p>See above</p> <p>Will be addressed in Procedure Manual</p> <p>See above</p>
	<p>6.12 – We recommend that the due date for contracts be changed to June 30th</p>	<p>N/A/-</p>	<p>See above</p>

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	<p>§126-28-8.1 – It has been the experience in some settings where individuals holding elementary certification with no Pre-K-K endorsement have been “grandfathered” in to teaching in WV Pre-k classrooms. Is this permissible under this policy language, and if so could it be made more clear that this is possible?</p> <p>8.2.1, 8.2.2, and 8.2.3 – We find the addition of “...and have 25% of the required coursework for one of the qualifying certifications...” very problematic. At minimum, “25% of the required coursework” is vague and leads to a multitude of interpretations and confusion. For example, does this mean the holder of an Associate’s Degree automatically has 25% of the coursework or is specific courses required? We would prefer this requirement be struck in order to facilitate the involvement of community partners to the fullest extent possible and maximize pre-k resources.</p> <p>8.3 – We recommend reconsidering the strike out of the last sentence, but reinstate it with Level III instead of Level V.</p> <p>§126-28-9.1 – With the suggested utilization of OEPA county auditing process, we strongly recommend that a frequency of no less than every two years be required for WV Pre-k settings and that a tool specific to the requirements of this policy be utilized by trained and qualified individuals. It has been the experience of some of the Head Start partners that ongoing monitoring and resulting program improvement and compliance has been very difficult. Any assurances that can be put into policy as well as practice are necessary to support collaboration and maximization of resources. The Head Start community would also like to recommend a reconsideration of the role of DHHR child care licensing staff as having a part in monitoring and quality assurance. We further recommend that the use of ECERS-R reports have significance in the monitoring process and that local ECERS-R teams include, at minimum, collaborative partners in addition to outside/independent participants.</p> <p>9.3 – We strongly recommend that ratios be maintained during nap time.</p> <p>9.6 – In collaborative settings, the stricter requirements must be met. Where Head Start participates, 3.5 hours of service must include a meal rather than just a snack. Also, we recommend adding: “... children and staff are seated together when eating.”</p> <p>9.7 – We recommend that: “All children entering an approved participating WV Pre-k classroom must have appropriate immunizations as defined by the American Academy of Pediatrics within 30 days of enrollment or, at minimum, a plan in place for reaching full compliance within 30 days.”</p> <p>9.8 – This conflicts with Head Start Performance Standards in that, regardless of percentage of funding, the requirements of the Standards must be met in all Head Start classrooms.</p>	N/A-	As per WVBE policy 5202
		N/A/-	Allowable in code for a very small specific group of teachers. Can no longer be done.
		N/A/o	Conflict with state law
		A/+	See above
		N/A/-	Added
		A/+	See above
		A/+	No conflict ascertained

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	<p>9.9 – We recommend using the term: "paid staff members".</p> <p>9.12.5 – We recommend adding: "yelling or screaming with a loud voice" We recommend adding: "<u>9.12.11 Withholding food as punishment.</u>"</p> <p>9.14 – We affirm the retention of 35 square feet per child, however, request that "in the classroom" be added. In addition, we recommend that a definition of "useable classroom space" be included in section 3 – Definitions.</p> <p>9.17 – We affirm the retention of supervised tooth brushing as a requirement for WV Pre-k classrooms. We recommend that this be a "daily" practice.</p> <p>9.20 – We recommend striking "...and circumstances..." We further recommend that rain also be a factor, besides temperature, to consider in excusing outdoor play. We also recommend adding 30 minutes of outdoor play in classrooms that operate less than 4 hours per day.</p> <p>9.21 – We affirm the inclusion of a "health assessment" or physical in the requirements of this section.</p> <p>9.21.2 – We strongly recommend that information about allergies and acute physical conditions be available upon enrollment rather than within 30 days.</p> <p>9.22 – We recommend adding: "...and share with the child's family."</p> <p>9.26 – We recommend adding the following sections (numerical order not important): Playground must be checked daily for hazards. Playground must a sufficient amount of age appropriate equipment to support gross</p> <p>§126-28-10. We affirm the content of this section, particularly the last sentence with regards to child assessment.</p> <p>§126-28-11.1 – We recommend adding to the last sentence: "...including preschool special needs classrooms."</p> <p>11.2 - We recommend that the use of student desks in WV-Pre-k classrooms be prohibited. Also, we recommend that "extended periods of sitting" be defined.</p> <p>11.6 – We affirm this statement and reiterate that "long periods of sitting" be defined.</p> <p>§126-28-13 We recommend adding a 13.4 which requires the use of an approved WV Pre-k curriculum and assessment system in pre-k special needs classrooms.</p> <p>§126-28-14.1 We recommend reinstating the 18 hour requirement for professional development.</p> <p>14.3 – We recommend reinstating the 36 hour requirement for training on the comprehensive curriculum and assessment systems. We further recommend striking "...in lieu of..." from the last sentence. We recommend adding a section "14.4" which would require partners in collaborative settings to provide training on appropriate regulations, such as Head Start Performance Standards and/or WVDHHR Day Care Licensing.</p> <p>§126-28-15.1 We strongly recommend that language be included in this</p>	<p>A/+</p> <p>A/+</p> <p>A/+</p> <p>A/+</p> <p>A/+</p> <p>N/o</p> <p>A/+</p> <p>A/+</p> <p>A/o</p> <p>A/+</p> <p>A/o</p> <p>A/+</p> <p>A/o</p> <p>N/o</p> <p>N//A/o</p> <p>N//A/o</p> <p>N//A/o</p>	<p>See above</p> <p>Language added</p> <p>See above</p> <p>Daily added</p> <p>Language added</p> <p>Language revised</p> <p>See above</p> <p>Will be addressed in procedure manual</p> <p>Language added</p> <p>In 11/6</p> <p>Procedure manual</p> <p>State elsewhere in the policy</p>
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	<p>section that defines who holds the LEA accountable for compliance with standards and what happens in the event of an impasse at the local level. Who is responsible for assuring resolution and what role, if any, does the state play in these situations? We further recommend that the reporting required in the former 16.3 be reinstated</p> <p>§126-28-16. We recommend the reinstatement of the former section: 17.2. We further recommend that a section be added which states that WV Pre-k classrooms added to the system that are not a part of the approved plan will not receive state aid formula funds.</p> <p>§126-28-17. We strongly recommend that language be included which addresses the use of ECERS-R results at the local level as well as from the state perspective. This has proven to be a useful tool in helping identify issues important to collaborative partners, however consequences for poor scores, especially when done independently, have not been defined or response required.</p> <p>17.1 Strike "the" before June 30.</p> <p>17.3 – Define "who" will raise concerns that result in a qualified outside evaluator assessing the program utilizing the ECERS-R. To whom will the report be sent? In addition, what will be the consequences once the independent report is released?</p>	<p>A/+</p> <p>N/A/+</p> <p>N/A/+</p> <p>A/+</p> <p>A/+</p>	<p>Added language as 16.2</p> <p>16.3 Added statement to clarify Language added</p> <p>Typographical error</p> <p>May be addressed in procedure manual.</p>
<p>6/15/05</p> <p>April Puzzuoli, Teacher Concord University PO Box 1000 Wall Box Athens, WV 24712-1000 apuzzuoli@concord.edu</p>	<p>§126-28-8 Not all state Preschool Special Needs Teachers are prepared to work with young children without disabilities. With the move toward greater inclusive classrooms and settings, certification in Early Education should be required.</p> <p>§126-28-9. Transportation: Where children are transported on school buses without booster seats, will this not be in conflict with the upcoming law on requiring booster seats for small children? Outdoor play: There are definitely times that temperature below 40 degrees are acceptable and would be healthy for children to play out doors. Conditions vary considerably depending on the wind chill and having children dressed properly. What</p>	<p>A/o</p> <p>N/o</p>	

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	<p>about the occasional use of sanitizing gel by the adults? I see this being done in classrooms and think that it is acceptable within reason. I appreciate the additional details on safe play yards.</p> <p>§126-28-11 This is an excellent section, which has a wealth of supportive research behind it. Overall the proposed policy is supportive of high quality programming recognized by professional associations and supported through documented research in the early childhood. The additional expectations on discipline are definitely needed.</p> <p>§126-28-13. Policy is fine as it is. Great!</p> <p>§126-28-17. While it is understandable that teachers not be rating their own rooms for reporting purposes, there is value in teachers doing a self-evaluation in order to develop a deeper understanding of the standards by which their classrooms are being evaluated. I recommend self-evaluation precede the external evaluations. There is an expanded version of ECERS-R available that includes all of the notes that were available on-line and much of what has been in <i>All About ECERS</i>. This version of the Revised Scale sets a considerably higher standard of expectations than what has been in use throughout the state. Will all programs be expected to comply with the latest edition? If so, when? Will trainers and staff be provided training before counties are expected to use this edition?</p>	N/+	Will be addressed in the Procedure Manual
<p>6/16/05</p> <p>Ruth Ann Ponzurick, Children Services Dir. NCWVCAA 213 Jackson Street Fairmont, WV 26554 raponzurick@ncwvcaa.org</p>	<p>§126-28-1 Please note I affirm ALL comments in each section previously submitted by Becky Gooch Erbacher on behalf of the WV Head Start Association</p> <p>§126-28-8.3 S.T.A.R.S career pathway Level II (as stated)for aides, assistants, or paraprofessionals may be in conflict as required for BOE aides/paraprofessionals. Recommend Level to be redefined at a minimum of Level III or equivalent to those required by BOE.</p>	N/+ A/o	
<p>6/16/05</p> <p>Jeff Neccuzzi, Director WV Immunization Program 350 Capitol Street Charleston, WV 25301 jeffneccuzzi@wvwdhhr.org</p>	<p>§126-28-9 West Virginia Bureau for Public Health, Division of Surveillance and Disease Control, Immunization Program submitted written official guidance on 6/15/2005 to WV Department of Education regarding the clarification of age appropriate immunizations. These written guidelines addresses the pre-kindergarten institutions in addition to immunization of children enrolled in any pre-school programs in general. These guidelines were are in accordance with the most current harmonized immunization schedule which is approved by the American Academy of Pediatrics(AAP), American Academy of Family Physicians(AAFP)and the Department of Health and Human Services, U.S. Public Health Service Advisory Committee on Immunization Practices(ACIP).However, please note that these immunization guidelines do not reference WV Compulsory School</p>	N/o	

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	<p>Immunization Law(16-3-4) but rather what's needed by children in order to help protect them and those they will be in contact with in the various pre-school environment's. Thanks in advance for allowing WV Bureau for Public Health representatives of the Immunization Program to provide assistance to this draft policy.</p>		
<p>6/15/05 Amy Keatley 2215 Kay Neva Lane Charleston, WV 25312 Keatley3@aol.com</p>	<p>§126-28-4 This policy need to be better defined concerning home visits. The federal register CFR Title 45 subpart 1304.40 (i) (3) Parental Involvement in Home Visits states the grantee and delegate agencies must schedule home visits at times that are mutually convenient for the parents or primary caregivers. IN SUBpart c 1306.34 requirements for home visits 1306.34 (c) (1) home visits must last for a minimum of 1 and ½ hours each. I feel that this needs to be reflected in section 126-28-4 because I have had a problem with Bonham Elem. Just showing up and not scheduling the home visit. They can show up at any hour of the day from 8 to 2:30 on any Friday that there is no head start. This is there idea of scheduling a home visit. If you ask when your next home visit is, they say it is on your calendar. It only stated no school on Fridays, nothing else. After meeting with the Principal, teacher and preschool coordinator, they stated it works for them. They then gave me a new calendar out after the meeting, and now it has on Fridays printed "home visits/conferences" but again, it does not state the person they are visiting, the hour of day, or which Friday they will come to a particular persons house. This is not a parent friendly policy, but they say they have no complaints and will continue to do so. They did offer to schedule a home visit with me, but i don't know why I would have to since it is supposedly all ready scheduled. They do not tell you this. How are other parents going to know this is wrong? They don't tell you, and only after a 20 min discussion that it is not scheduled on calendars, which they insisted they were, did they break down and ay they would schedule them! Please help</p>	<p>N/o</p>	
<p>6/8/05 Irene Murphy, Director Jackson Co. Schools PO Box 770 Ripley, WV 25271</p>	<p>§126-28-3.12 To be eligible for kindergarten, students must be 5 on or before Sept. 1 §126-28-11 I totally agree with the concept that this law is striving towards. However, to specifically say that flash cards is a teaching strategy that cannot be used is ridiculous. Also.. there are some skills that <u>ALL</u> children NEED to work on! In some instances content should be taught in isolation.</p>	<p>N/A/o</p>	<p>Case law and statute conflict Flash cards are not developmentally appropriate for Pre-k</p>
<p>6/9/05 Sharon Dyer, Elem. Supervisor Mercer Co. School 1403 Honaker Ave. Princeton WV 24740</p>	<p>§126-28-9 The biggest concern I have is trying to retrofit the new regulations of Policy 2525 into our preexisting classrooms. Section 9.14 requires that there be a minimum of 35 square feet per child of usable indoor space. Some of our older buildings are not designed to meet this regulation.</p>	<p>A/o</p>	<p>See above</p>

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	<p>Under section 9.17, our county classrooms are not equipped with sinks. Therefore, pre-k students would have to brush their teeth in restrooms used by all students and would not be conducive to sanitary conditions. Section 9.26 requires that playground areas be fenced. School playgrounds are very large and would require a vast amount of fencing which would put a tremendous financial burden on our school system.</p>	N/A/-	<p>Health and safety issue. A portion of the playground can be designated for Pre-k students.</p>
<p>Anne Seaver, Superintendent Tyler Co. Schools PO Box 25 Middlebourne WV 26149</p>	<p>§126-28-1 The revisions to this policy are excellent. Public education pre-schools teachers are professionals who need to make decisions regarding individual students needs and not be micro managed by DHHR's regulations for Head Start. §126-28-9.20 Please eliminate this paragraph. Teachers should make the decision regarding amount of out-door time need – this is micro management! (one hour. If it is 40a)</p>	N/+	<p>Based on national recommendations</p>
<p>6/15/05</p>	<p>Senator Billy Wayne Bailey</p> <p>6.3 It is essential that the LEA not open any new classrooms without the signatures of all the county collaborative team. The LEA should not be left to determine if the classroom will negatively impact a partner. Every new classroom should be a collaborative classroom unless all partners agree it should not be. 6.5 The 50% contracted classrooms are necessary to ensure the survival of private preschools and Head Start. 8.2.1 – 8.2.3 This section appears to be limiting the ability of community partners to participate in collaboration except as support staff. During negotiation over SB247, community partners were told that their teachers would be eligible to receive per its under Policy 2525. This change is undoing assurances that the legislature made to many preschool providers when passing SB 247. I recommend removing the "... and have 25% of the required coursework for one of the qualifying certifications." 9.1 – 9.2 As younger and younger children enter the public school system, it is essential that we realize these children are still babies; therefore, all daycare licensing regulations should be followed by all providers. It is inherently unfair to require private preschools to follow daycare regulation but not require Boards of Education. If daycare regulations are in place to guarantee the health and safety of children, all preschoolers should be protected, not just the children attending private preschool and HEAD start. I was startled and appalled to hear school superintendents state that basic health and safety regulations were too expensive or burdensome for them to follow. All preschool classrooms should be licensed by DHHR and follow the Daycare Licensing Regulations.</p>	<p>A/+ N/A/- N/+ N/+ N/-</p>	<p>All of Senator Bailey's comments have been addressed in previous sections offered by the Head Start association and WVDHHR.</p> <p>NAEYC defined babies as children up to the age of 24 months of age.</p>

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	<p>The Office of Education Performance Audits is not equipped to inspect preschool classrooms. These classrooms should be inspected and regulated by those that are the experts in preschool aged children (DHHR).</p> <p>9.14 WV Pre-K classrooms should provide 35 square feet per child of usable classroom space. This section needs tighten to prevent including hallways, restrooms, etc. in the calculation of usable space.</p> <p>9.15 This section should be tightened to require play areas to be equipped with age appropriate and adequate playground equipment and outdoor toys.</p> <p>9.26 This section needs to remain as written to ensure the safety of preschool children.</p> <p>9.27.2 The Legislature has implemented strict laws concerning the transportation of small children. Study after study has shown that children are safer in age and size appropriate restraint systems. Sitting preschool age children in a designated section of the bus is NOT sufficient to keep them safe. These preschool children should be transported while restrained in proper restraints. If local Boards of Education can not meet this requirement, they should contract with a provider that can. There should also be a monitor on any bus transporting preschool children. Simply placing preschool children in a designated area of the bus without restraints and a monitor to ensure that they are safe could lead to tragedies in this state. Please see the attached articles concerning the transportation of small children. It is crucial that we prevent these types of tragedies and near tragedies in West Virginia. Restraints and bus monitors would dramatically increase the safety of preschool children during transport to and from schools</p>	<p>A/+</p> <p>A/+</p> <p>N/+</p> <p>N/A/-</p>	<p>Transportation is not mandated under this policy. If counties choose to transport, they must follow all applicable laws and policies.</p>
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Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Monday, May 23, 2005 11:40 AM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2005-05-23 11:39:43)

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=549fdfaccc4986f2f17102alac17f96d> This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 2525

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Name: Ann Sammons
Organization: Raleigh County BOE
Email: annsammons@charter.net
Title: School Nurse Coordinator
Address1: 105 Adair Street
Address2:
City/State/Zip: Beckley, WV 25801
Role: Community Member
Posted: 2005-05-23 11:39:43
Posted from IP: 168.216.50.185

Comments for section §126-28-1 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 Waivers

Comments for section §126-28-8 Personnel Standards

Comments for section §126-28-9 Regulation of Facilities

9.21 I believe pre-k students should follow the same guidelines and laws as students in grades k-12 (reference WV Code 16-3-4). There should also be reference to the fact the school nurse cannot legally delegate medication administration and/or other specialized procedures to head start staff. The school nurse can only delegate to BOE staff. Staff

will need to be sure a trained staff member accompanies the student on field trips.

Comments for section §126-28-10 Standards for Preparing Students

Comments for section §126-28-11 Curriculum and Assessment

Comments for section §126-28-12 Transition and Continuity

Comments for section §126-28-13 Inclusive Environments

Comments for section §126-28-14 Staff Development and Training

Comments for section §126-28-15 Program Oversight

Comments for section §126-28-16 Financing

Comments for section §126-28-17 Program Evaluation

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Tuesday, May 24, 2005 3:49 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2005-05-24 15:49:09)

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Comment Received for Policy 2525

#####

Name: Beth S. Brown
Organization: Grant County Schools
Email: btsbrown@access.k12.wv.us
Title: Preschool Special Needs Teacher
Address1: Rt.3, Box 518
Address2:
City/State/Zip: Elkins, WV 26241
Role: Teacher
Posted: 2005-05-24 15:49:09
Posted from IP: 63.92.104.43

Comments for section §126-28-1 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 Waivers

Comments for section §126-28-8 Personnel Standards

Comments for section §126-28-9 Regulation of Facilities

9.5 WVBE Policy 2419 is not clear on the ratio for a preschool classroom of 20 children, 10 who are exceptional with IEPs. What are the maximum and minimum for children/staff?

9.20 A minimum of 1 hour of outdoor play when a program is more than 4 daytime hours can

amount to almost 25% of the day in outdoor play, almost 25% nap period (9.19.2), and almost 25% for meals (9.6), leaves only 25% for the meat of the curriculum of a preschool (not a daycare).

Provisions for gross motor activity is vital, but only addressed for outdoor play. Since there are a significant number of days of inclement weather, indoor gross motor activity should also be addressed. This may be an issue for the size of many facilities.

Comments for section §126-28-10 Standards for Preparing Students

Comments for section §126-28-11 Curriculum and Assessment

Comments for section §126-28-12 Transition and Continuity

Comments for section §126-28-13 Inclusive Environments

Comments for section §126-28-14 Staff Development and Training

Comments for section §126-28-15 Program Oversight

Comments for section §126-28-16 Financing

Comments for section §126-28-17 Program Evaluation

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Thursday, May 26, 2005 12:59 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2005-05-26 12:59:25)

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Comment Received for Policy 2525

#####

Name: Mary Jo Graham
Organization: Marshall University
Email: graham@marshall.edu
Title: Professor
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City/State/Zip: Huntington, WV 25755
Role:
Posted: 2005-05-26 12:59:25
Posted from IP: 206.212.9.97

Comments for section §126-28-1 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 Waivers

Comments for section §126-28-8 Personnel Standards

I have read through Policy 2525 and find it to be quite comprehensive and well developed. I have one area of concern. Under recognized professional licenses in West Virginia there are two that are listed. One is Birth - Pre-K which is called preschool education and the other is PreK - K which is called Early Education. Another area listed is Early Childhood Education which is identified as K - 4. The policy should use the language of the WVDE and under 8.1 it does not. Preschool Education (Birth - Pre-K) and Early Education Pre-K - K are the only two certifications that indicate pre-kl in their title and therefore to not be on permit an individual should have one of these two certifications.

A third area that lists preschool ages in the certification is called Preschool Special Needs (Pre-K - K). Allowing this certificate to be accepted is potentially problematic. In some institutions, students do not receive courses in typical development and in setting up environments/curriculum for typically developing children. This puts teachers in a position of not being prepared to create classrooms that meet the needs of all students. It would be wise to have the teacher's transcripts looked at to be certain that their coursework supported their work with typically developing children and, if not, create some professional development opportunities for these teachers.

Comments for section §126-28-9 Regulation of Facilities

Comments for section §126-28-10 Standards for Preparing Students

Comments for section §126-28-11 Curriculum and Assessment

Comments for section §126-28-12 Transition and Continuity

Comments for section §126-28-13 Inclusive Environments

Comments for section §126-28-14 Staff Development and Training

Comments for section §126-28-15 Program Oversight

Comments for section §126-28-16 Financing

Comments for section §126-28-17 Program Evaluation

Cathy Jones

From: Jane Hauger [jhauger@access.k12.wv.us]

Sent: Thursday, May 26, 2005 11:25 AM

To: ctrjones@access.k12.wv.us

Subject: Policy 2525 Comment

9

I am unable to comment on line about Policy 2525.

I feel the classroom ratio of 20 to 1, teacher with assistance is too high. After over 20 years in kindergarten I can testify that the actual number of children present in the classroom, even with adequate numbers of adults does have an impact on program delivery.

The increase in noise, distraction, waiting time due to this number of children can be a problem in kindergarten and will be moreso as the age of the children decreases. The unnatural situation of large numbers of age similar children causes diminishing returns in learning.

All other changes in Policy 2525 are welcome and appear appropriate. The number of children per classroom are my only concern.

Jane Hauger
Terra Alta/East Preston School
1130 State Street
Terra Alta, WV 26764-1414

Cathy Jones

From: Rebecca Tinder [rtinder@access.k12.wv.us]
Sent: Thursday, May 26, 2005 8:27 AM
To: Cathy Jones
Subject: FW: Revised Policy 2525 on Public Comment

-----Original Message-----

From: Rebecca King [mailto:rjking@access.k12.wv.us]
Sent: Wednesday, May 25, 2005 4:54 PM
To: Rebecca Tinder
Subject: RE: Revised Policy 2525 on Public Comment

Section 9.7. of Policy 2525 states, "All children entering an approved participating WV Pre-k classroom must have age appropriate immunizations as defined by the American Academy of Pediatrics within 30 days of enrollment". I commend the collaborative effort to make policy uniform for all agencies with pre-K programs. WV Code defines needed immunizations for children entering into WV Public schools. The interpretation of 16-3-4 would guide us to defining the law for pre-K pupils. The law states, "All children entering school for the first time in this state shall have been immunized against...". Does the first time refers to compulsory age or any age? It also states, "No child or person may be admitted or received in any of the schools of the state until he or she has been immunized...".

I recommend the policy reflect current WVa Code 16-3-4 for any child in public schools or in outside pre-K agencies holding class in a public school building. As stated in Section 9.8. of the revised policy, "Programs operated by the county board of education shall adhere to WVa Code ...". I feel that for immunizations it should state, "Programs operated by the county board of education or within the public school system shall adhere to WVa Code ...".

The issues that I foresee arising are as follow:

1. Children entering into the public school system or building without any immunizations. Currently pertussis is on the rise and has caused death to a 2 month old in Morgantown this year. Netherlands/Canada have seen an outbreak in Rubella. If children take home communicable disease to infant/toddler siblings it could result in death.
2. There will be massive confusion among school personnel in interpreting WVa Code 16-3-4 and Policy 2525. The uniformity and compliance with current law will be lost. We currently deal with several issues related to immunizations and NCLB.
3. We currently to not have enough staff to keep up with so many different time frames, like 90 days after one series or 30 days after enrollment. I do not feel counties would be compliant with the policy.

PS: Is there a fiscal note to cover Section 9.7. and 9.8.? We must have more trained personnel for screenings and nursing staff for checking of immunizations and training staff.

Thank you for considering my input,

Rebecca King

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Friday, June 10, 2005 1:39 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2005-06-10 13:38:36)

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This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 2525

Name: Margie Hale
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Email: margiehale@wvkidscountfund.org
Title: executive director
Address1: 1031 Quarrier St., Su 313
Address2:
City/State/Zip: CHARLESTON, WV 25301
Role: Community Member
Posted: 2005-06-10 13:38:36
Posted from IP: 216.12.103.10

Comments for section §126-28-1 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

6.5 "Must" and "phasing in providing services in collaborative settings" should be reinserted.
6.10 (old) should be reinserted to require county plans to list all programs that were invited to participate in the planning process regardless of whether the program chose to participate.

Comments for section §126-28-7 Waivers

Comments for section §126-28-8 Personnel Standards

Comments for section §126-28-9 Regulation of Facilities

9.14 "Usable indoor space", when it is defined, should not be interpreted to mean any space outside the classroom. The curriculum requires 35 square feet per child in the classroom.

Comments for section §126-28-10 Standards for Preparing Students

Comments for section §126-28-11 Curriculum and Assessment

Comments for section §126-28-12 Transition and Continuity

Comments for section §126-28-13 Inclusive Environments

Comments for section §126-28-14 Staff Development and Training

Comments for section §126-28-15 Program Oversight

the old 16.3 should be retained so that a report is required to both LOCEA and the JCGF and the report must address the items included there, such as an analysis of costs, a summary of plans, the impact of the plans on counties with increased enrollment and an analysis of the affect of the programs on the maximization of the use of federal funds. 16.53 should specify what the report should address and that it will be submitted to JCGF as well as LOCEA.

Comments for section §126-28-16 Financing

Comments for section §126-28-17 Program Evaluation

17.3 Classrooms must be evaluated by a qualified and "trained" reviewer on a regular basis (not just when "concerns" arise). This is the only way we can determine what technical assistance may be needed in order to provide the highest quality pre-k services. The proposed rule does not require a trained reviewer or regular monitoring.

17.5 This section should be changed to require the evaluation of program impact including assessment of family satisfaction, program continuity, instruction, classroom climate as well as learner outcomes. If program evaluation only tracks learner outcomes it will fail to assess all necessary elements of the program. See *Preschool Assessment: A Guide to Developing a Balanced Approach*, by NIEER.

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Friday, May 27, 2005 7:53 AM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2005-05-27 07:52:38)

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This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 2525

#####

Name: Joseph O. Smith
Organization: Wood County Bord of Education
Email: joeosmith@yahoo.com
Title: Teacher-Physical Education-NBCT
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Address2:
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Role: Teacher
Posted: 2005-05-27 07:52:38
Posted from IP: 24.158.95.196

Comments for section §126-28-1 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 Waivers

Comments for section §126-28-8 Personnel Standards

Comments for section §126-28-9 Regulation of Facilities

Comments for section §126-28-10 Standards for Preparing Students

The general statements directing curriculum read as to emphasize literacy and symbol identification and making letters in several curriculums. These are 3 and 4 year old CHILDREN!! The sensory, motor, and perceptual development to develop neural pathways for language acquisition skills need to be developed first. This occurs through various forms of actual physical movement of the entire body to strengthen the vestibular and proprioceptive systems of the body, which integrate sensory information from the body through the inner ear and the brain stem. The teaching of symbols before CHILDREN are physical prepared with the sensory motor and perceptual skills being integrated before time and age appropriate experiences have been given to develop the brain causes processing in the wrong areas of the brain.

**Movement and rhythm stimulate the frontal lobes and enrich language and motor development (Brewer & Campbell, 1991).

Although these activities are helpful in preparing the brain for language, it should be noted that children should not be pushed to read early. Reading too early puts stress on the eyes and causes other potential damage. In Chris Brewer and Don Campbell's book, Rhythms of Learning, they state that emphasis on early acquisition of reading, writing, math and other symbol systems may actually cause children to develop awkward and inappropriate methods of understanding these symbols. If this information is given to a child before they are neurologically ready, it may just result in meaningless memorization. If this is done prematurely, it may process in the wrong region of the brain, which is not as beneficial as processing in the proper region. In Denmark, reading is not taught until the age of eight and their literacy rate is 100 percent. (Campbell, D. & Brewer, C. (1991). Rhythms of learning. Tucson, Arizona: Zephyr Press.)

This means educators can be contributing to "learning differences" when this unnecessary STRESS is created in academic focused settings before CHILDREN are ready-physically and neurologically!!

The National Association for the Education of Young Children (NAEYC) has the following standards for movement listed specifically in the National Standards: Physical Development and Skills

2.81 P-K Children have varied opportunities and are provided equipment to engage in large motor experiences that stimulate a variety of skills.
enhance sensory-motor integration.
develop controlled movement (balance, strength, coordination).
enable children with varying abilities to have gross-motor experiences similar to those of their peers.
range from familiar to new and challenging.
help them learn physical games with rules and structure.

2.82 I-T Infants and toddlers/twos have multiple opportunities to practice emerging skills in coordination, movement, and balance and in perceptual-motor integration.
to interact in an environment that allows them to move freely and achieve mastery of their bodies through self-initiated movement.

2.83 I-T Infants and toddlers/twos have multiple opportunities to develop fine-motor skills by acting on their environments using their hands and fingers in a variety of age-appropriate ways.

2.84 T-P-K Children are provided varied opportunities and materials that support fine-motor development.

2.85 P-K Children are provided tools and guided in their use in writing, drawing, art, and science activities.

2.86 T-P-K Children are provided opportunities and materials that increase their awareness of safety rules in their classroom, home, and community.

2.87 T-P-K Children have opportunities to practice safety procedures.

2.88 T-P-K Children are provided opportunities and materials that encourage good health practices, such as serving and feeding themselves, rest, good nutrition, exercise, hand washing, and brushing teeth.

2.89 T-P-K Children are provided opportunities and materials to help them learn about nutrition, including sources of food and recognizing, preparing, eating, and valuing

healthy foods.

2.90 P-K Children are provided opportunities to discuss, ask questions, and raise fears about visiting the doctor, clinic, hospital, or dentist; getting shots; or taking medicine.

West Virginia is blessed with one of the nations most knowledgeable and leading child development researchers and curriculum designers in the United States at West Virginia University. Dr. Linda Carson has spent her career creating age appropriate practices for pre-k children and teaching educators in forums nationwide. I strongly urge the State Dept of education contact her and/or use her expertise for informing educators/county curriculum supervisors in creating age appropriate practices and assessments.

http://www.nis.wvu.edu/2003_Releases/ware_professor.htm
Childhood fitness advocate named Ware Distinguished Professor at WVU

CONTACTS: Linda Carson, Ware Distinguished Professor, 304-293-3295, ext. 5276 Dana Brooks, dean, School of Physical Education, 304-293-3295, ext. 5285

The recipient of the first endowed professorship in West Virginia University's School of Physical Education plans to use her position to spread the message about childhood fitness - a growing national issue given the number of obese kids.

Linda Carson, an associate professor and director of the West Virginia Motor Development Center, was named the Ware Distinguished Professor in a ceremony Monday, Feb. 10, in the Coliseum's Jerry West Mountaineer Lounge. The Ware Family Foundation established the professorship in honor of School of Physical Education alumni Alfred F. and Dolores Jamison Ware.

"Statistics show that children are overweight but many are undernourished because of the food and activity they choose or the ones chosen for them," Carson said. "Statistics also show more children choose to be sedentary than active. I am privileged to bear the responsibility of the Ware professorship to try to reverse these trends and impact children's fitness in West Virginia."

Carson has been a faculty member in the School of Physical Education for 22 years. Before that, she taught at Purdue University, Davis & Elkins College and New Jersey public schools. A native of Chambersburg, Pa., she has a bachelor's degree in health and physical education and a master's degree in physical education from Slippery Rock (Pa.) University and a doctorate in physical education with an emphasis on motor development from WVU.

She started the Motor Development Center at WVU in the 1980s as a way of teaching motor skills and active lifestyles to infants, babies, toddlers, preschool and elementary school children. The center - a collaboration between the School of Physical Education and the Center for Excellence in Disabilities at WVU - includes such programs as ToddlerSkills for children ages 1-2, KinderSkills for youngsters ages 3-5 and FutureFit for children ages 6-11. U.S. Games, a sporting goods company, named the center a national demonstration and training site in 1999.

Carson also developed the Choosy Kids Club, an after-school fitness education program for elementary school children in Monongalia and surrounding counties. Some 250 children meet twice a week at the Coliseum to learn the value of exercise, nutrition and being tobacco- and drug-free. Choosy, a green character with antennae and sunglasses, is the club's mascot. Club members have a pledge they recite, secret greeting and club songs. About 20 WVU students from various disciplines staff the meetings, gaining practical experience in teaching childhood fitness.

It is the Choosy Kids Club that Carson wants to expand, using the Ware Distinguished Professorship as her bully pulpit. Her goal is to establish Choosy Kids Clubs in schools across the state and encourage adults to be equally choosy when making decisions on behalf of children. To this end, she is forming partnerships with the Department of Education; Office of Healthy Schools; West Virginia Bureau of Public Health; Office of Maternal, Child and Family Health; CARDIAC Project; the Prevention Research Center at WVU; Head Start; the Center for Excellence in Disabilities at WVU; and Forward Southern West Virginia.

"The Ware Distinguished Professorship is providing impetus for this new focus in the Motor Development Center," Carson said. "The WVU community and the state will benefit greatly by

the generosity of the Ware Family Foundation, and we're so grateful for the family's interest in the well-being of children in the state."

Linda Carson, the Ware Distinguished Professor in the School of Physical Education, helps Choosy Kids Club members Allison Lynch, 7, and Jack Goellner, 6, get fit on stationary bikes. (Click on photo for larger version)

The Ware professorship is just the latest recognition of Carson's efforts on behalf of kids. She is the recipient of WVU's Outstanding Teacher Award, the Eugene M. Fuller Award for the Most Outstanding Recreation Programming in West Virginia and the PATCH Award for Outstanding Contribution to Community Well-being. She is also a consultant for a children's television program, "Bloopy's Buddies," which focuses on physical activity, nutrition and safety in preschool children.

Dean Dana Brooks said Carson's credentials speak volumes for why she was selected for the professorship.

"She is a nationally renowned physical education teacher educator," Brooks said. "The West Virginia Motor Development Center she runs has become a premier child development center in West Virginia and the region. Based upon her outstanding teaching and service, she is highly qualified for this distinguished professorship, and I'd like to thank the Ware Family Foundation for its support."

Al Ware, the founder and chairman emeritus of Amherst FiberOptics, and Dee Ware, a former teacher, said Carson's teaching emphasis on healthy lifestyles melds with their own philosophy of well-being.

"With Dr. Carson's development of the Motor Development Center, we know that when children are exposed to physical activity early in their lives, they tend to continue those activities throughout their lives," Ware said. "Today, with high obesity rates among children, it's obvious we need more emphasis on health, physical activity and lifestyle changes."

Also the West Virginia Motor Development Center can be located on the web at <http://www.wvu.edu/~physed/mdc/about.htm>

The National Association for the Education of Young Children (NAEYC) National standards should be utilized to revise and align the West Virginia CSO's for this entire document. Language Development and this important time of child development but much of the National standards are related in exposure to letters rather than mastery of sophisticated and abstract comprehension of literacy and language for academic higher order thinking skills.

2.21 P-K Goals and objectives for children's acquisition of language align with the program philosophy and consider family and community perspectives.

2.22 U Curriculum guides teachers to value and support children's oral and written communication in a language their family uses or understands.

2.23 U Children have varied opportunities to develop competence in verbal and nonverbal communication by responding to questions; communicating needs, thoughts, and experiences; and describing things and events.

2.24 T-P-K Curriculum guides teachers to support alternative communication strategies for children who are nonverbal.

2.25 U Children have varied opportunities to develop vocabulary through conversations, experiences, field trips, and books.

2.26 P-K Children have varied opportunities and materials that encourage them to have discussions to solve problems that are both interpersonal and related to the physical world.

2.27 P-K Children have varied opportunities and are provided materials that encourage them to engage in discussions with one another.

Early Literacy Development

2.28 P-K Children have varied opportunities to

be read books in an engaging manner at least twice daily in full-day programs and at least once daily in half-day programs in group or individualized settings.

be read to in individualized ways including one to one or in small groups of two to six

children regularly.

explore books on their own and have places that are conducive to the quiet enjoyment of books.

have access to various types of books including storybooks, factual books, books with rhymes, alphabet books, and wordless books.

be read the same book on repeated occasions.

retell or reenact events in storybooks.

engage in conversations that help them understand the content of a book.

be assisted in linking books to other aspects of the curriculum.

identify the parts of books and differentiate print from pictures.

2.29 I Foundations for early literacy are developed by building on infants' enjoyment of songs, rhymes, routine games, and books by engaging infants in individualized play that includes simple rhymes, songs, and interactive games (e.g., peek-a-boo).

planning daily opportunities for each child to hear and respond to various types of books including picture books, wordless books, and books with rhymes.

making different types of durable books available for children's independent exploration.

2.30 T Foundations for early literacy are developed by building on toddlers'/twos' enjoyment of books, songs, rhymes, and routine games by

engaging in these activities on an individualized basis.

planning daily opportunities for each child to hear and respond to various types of books including picture books, wordless books, and books with rhymes.

making different types of durable books available for children's independent exploration.

providing opportunities and materials for toddlers/twos to begin exploring and learning about painting, drawing, and scribbling.

helping toddlers/twos understand that pictures represent real things in their environment.

engaging toddlers/twos in individualized play that includes simple rhymes, songs, and sequences of gestures (e.g., finger plays, peek-a-boo, patty-cake).

2.31 T-P-K Children have activities that allow them to become familiar with print:

Teachers help children recognize print and connect it to spoken words.

Children have opportunities to make sense of environmental print in their classroom. Some materials are labeled, and print is used to describe some rules and routines. Items belonging to a child are labeled with his or her name. Children are actively involved in making sense of print.

Children have opportunities to become familiar with, recognize, and use print that is accessible throughout the classroom.

2.32 K Children have varied opportunities to learn to read familiar words, sentences, and simple books.

2.33 P-K Children have multiple and varied opportunities to write:

Writing is embedded into art, dramatic play, and various center activities, and writing materials are readily available for use in these areas.

Children have daily opportunities to write or dictate their ideas.

Various types of writing are supported, including scribbling, letter-like marks, and developmental spelling.

Children are given the support they need to write on their own including access to the alphabet (e.g., displayed at eye level or on laminated cards) and printed words about topics of current interest.

Children are provided needed assistance in writing the words and messages they are trying to communicate.

Children see teachers model functional use of writing and are helped to discuss the many ways writing is used in daily life.

2.34 K Each child is encouraged to write independently each day.

2.35 P-K Children are regularly provided multiple and varied opportunities to develop phonological awareness:

They are encouraged to play with the sounds of language including syllables, word families, and phonemes using rhymes, poems, songs, and finger plays.

They are helped to identify letters and the sounds they represent.

They are helped to recognize and produce words that have the same beginning or ending sounds.

They are supported in their self-initiated efforts to write letters that represent the sounds of words.

- 2.36 P-K Children are given opportunities to recognize and write letters.
2.37 K Children are encouraged to identify phonemes in words through varied activities, including writing and games.
2.38 P-K Books are displayed and writing is encouraged in one or more areas of the classroom.

With the NAEYC Standards available and Dr. Carson as a West Virginia University Resource along with retired educators available (Dr. Sallie Plymale-Marshall University retired, and Mother of Senator Robert Plymale), this entire document should and could be revised/aligned to reflect age appropriate specifics before being adopted as policy.

Comments for section §126-28-12 Transition and Continuity

Comments for section §126-28-13 Inclusive Environments

Comments for section §126-28-14 Staff Development and Training

Comments for section §126-28-15 Program Oversight

Comments for section §126-28-16 Financing

Comments for section §126-28-17 Program Evaluation

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Wednesday, June 01, 2005 11:19 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2005-06-01 23:19:22)

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Comment Received for Policy 2525

Name: Carroll Staats
Organization: Jackson County Schools
Email: staatsc@charter.net
Title: Board Member
Address1: 715 South Ritchie Avenue
Address2:
City/State/Zip: Ravenswood, WV 26164
Role: Community Member
Posted: 2005-06-01 23:19:22
Posted from IP: 66.168.170.147

Comments for section §126-28-1 General

A delegation of preschool teachers appeared before our board to express their concern about the amount of paperwork they are being required to do because of the requirements of policies 2525 and 2419. They have requested to have Friday of each week to perform the required paperwork thus eliminating one day of classes for preschool students each week. Please review the policy and study possible changes to reduce the required paperwork. We do not want to lose 20% of the classtime for preschool students.

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 Waivers

Comments for section §126-28-8 Personnel Standards

Comments for section §126-28-9 Regulation of Facilities

Comments for section §126-28-10 Standards for Preparing Students

Comments for section §126-28-11 Curriculum and Assessment

Based on comments by our preschool teachers and special education director, there is an extraordinary amount of paperwork required for assessment. Please find a way to make it reasonable.

Comments for section §126-28-12 Transition and Continuity

Comments for section §126-28-13 Inclusive Environments

Comments for section §126-28-14 Staff Development and Training

Comments for section §126-28-15 Program Oversight

Comments for section §126-28-16 Financing

Comments for section §126-28-17 Program Evaluation

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Thursday, June 02, 2005 10:21 AM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2005-06-02 10:20:56)

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Comment Received for Policy 2525

#####

Name: Brenda Isaac RN
Organization: Kanawha County Schools
Email: Isaacrn@aol.com
Title: Lead School Nurse
Address1: 200 Elizabeth Street
Address2:
City/State/Zip: Charleston, WV 25311
Role: Professional Support
Posted: 2005-06-02 10:20:56
Posted from IP: 168.216.64.138

Comments for section §126-28-1 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 Waivers

Comments for section §126-28-8 Personnel Standards

Comments for section §126-28-9 Regulation of Facilities

9.7 Children should be required to have at least one of each required immunization prior to entering school. It is not safe to allow a completely unimmunized student into the setting for even 30 days. 9.21 To keep children healthy and safe the health information should be on file prior to the student's enrollment. Health conditions that would impair

learning should be dealt with and a health care plan in place before the student starts school. To do otherwise would jeopardize that student's health and perhaps even endanger his/her life. In some instances, other students could also be jeopardized. For example, a student with a life threatening allergy or some other life threatening condition should have everything in place prior to entering school. This would include all physician orders and an emergency care plan.

Comments for section §126-28-10 Standards for Preparing Students

Comments for section §126-28-11 Curriculum and Assessment

Comments for section §126-28-12 Transition and Continuity

Comments for section §126-28-13 Inclusive Environments

Comments for section §126-28-14 Staff Development and Training

Comments for section §126-28-15 Program Oversight

Comments for section §126-28-16 Financing

Comments for section §126-28-17 Program Evaluation

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Tuesday, June 14, 2005 9:04 AM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2005-06-14 09:04:14)

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Comment Received for Policy 2525

#####

Name: Kay Tilton; Ann Nutt; Melanie Clark
Organization: WVDHHR Division of Early Care and Education
Email: ktilton@wvdhhr.org; annnutt@wvdhhr.org; melanieclark@wvhhr.org
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Address1: 350 Capitol Street, Room B-18
Address2:
City/State/Zip: Charleston, WV 25301
Role:
Posted: 2005-06-14 09:04:14
Posted from IP: 129.71.238.253

Comments for section ;±126-28-1 General

Comments for section ;±126-28-2 Guidelines

Comments for section ;±126-28-3 Definitions

„X ;±126-28-3.5 Collaborative Setting Clarification is needed for what qualifies as a partner, this impacts percentage of collaborations with community partners in Section 6 and needs to indicate that at least one partner is a community program.

„X ;±126-28-3.16 Procedure Manual It is of concern that this is not available for review and comment with the Policy as it impacts expectations for implementation. Recommend that this be developed collaboratively with all partners and that language be added to the policy to insure this process.

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

„X ;±126-28-6.1 Collaborative partnerships would be better served if the wording for this was revised to: ;§ The West Virginia Department of Education, in collaboration with the WV DHHR, has the responsibility of convening;K. ; This role of the WVDHHR is supported in SB 247.

„X ;±126-28-6.2 Language regarding sharing county plan feedback with collaborative team should be strengthened to indicate a requirement.

"X ¶126-28-6.3 This reflects a change from an annual plan to a plan submitted every two years. The time frame change impacts state level ability to track collaboration and phase in efforts for community programs. The WV DHHR takes its role in insuring collaboration with community partners seriously. Perhaps a complete plan every two years is adequate, but a briefer update and progress report regarding collaboration and community partnerships must be submitted on the alternate years. At a minimum, an interim report, signed by all partners, with specific progress in collaboration as well as any areas of concern from the approved plan would strengthen implementation efforts.

;"Viable;" partners needs further clarification/definition as well as support to county planning team determination of viability of specific potential partners.

"X ¶126-28-6.4 Inclusion of the need to submit changes to the plan is supported and a helpful addition to the policy. However, any changes to the plan that impact partnerships and/or the quality of educational services offered should all be submitted with signatures from the collaborative partners, not just changes that impact funding.

"X ¶126-28-6.5 Continued expectation for 50% of the classrooms for eligible children provided through contractual agreements with community programs is affirmed and essential for the success of the WV Pre-k program.

;"Counties should phase in classrooms incrementally to meet the requirement for universality by 2012-13." ;"Should;" implies an option to delay use of community programs until 2012-13. This is detrimental to community partners whose business/ or funding may have been negatively impacted in the interim years. An expectation of phase in throughout the upcoming years is critical for communities and early childhood providers to work and plan in an effective collaborative fashion.

"X ¶126-28-6.11 This seems a little confusing on when or why a county should submit - this may need clarification regarding the whens and whys. Does there need to be anything further here about what happens re: plans etc.

Comments for section ¶126-28-7 Waivers

Comments for section ¶126-28-8 Personnel Standards

"X ¶126-28-8.2 Language should add the allowance of a waiver or other alternative if the 25% is not met. It is important to insure community program staff have opportunities to use their skills and increase their education. Other options should be identified in the policy to insure continued participation by community program staff.

"X ¶126-28-8.3 All staff in an early childhood classroom must have training regarding children, their development and ways to support optimal development. Reducing educational expectations of aides seems to be a disservice to the integral role all adults play in providing quality educational experiences. Some additional education should be expected.

Comments for section ¶126-28-9 Regulation of Facilities

"X ¶126-28-9.2 Further clarification is needed in this section regarding licensure of Head Start programs that fall under the WVDHHR Day Care Licensing, 78CSR expectations for licensure based on hours of operation.

"X ¶126-28-9.8 Continued expectation for screening children is affirmed, thereby enabling the early identification of health and /or developmental concerns.

"X ¶126-28-9.14 A definition of ;"useable;" space is critical as a part of the policy to insure that actual classroom space provides a minimum of thirty-five (35) square feet of indoor space per child. This is a minimum requirement in order to support developmentally appropriate curriculum and to insure that children's time in spent in quality learning experiences.

"X ¶126-28-9.26 Inclusion of the expectation of fenced playground areas is affirmed in

order to protect children's safety.

Comments for section 126-28-10 Standards for Preparing Students

Comments for section 126-28-11 Curriculum and Assessment

"X 126-28-11.1- 11.3 At this time there is not a list of approved enhancements. Suggest striking curriculum enhancements in 11.1 (and consider implications of strike in 11.3), as 11.2 further describes their selection and use.

Comments for section 126-28-12 Transition and Continuity

Comments for section 126-28-13 Inclusive Environments

Comments for section 126-28-14 Staff Development and Training

"X 126-28-14.1 and 14.2 Continued inclusion of the use of the West Virginia State Training and Registry System (STARS) training process and the Core Knowledge/ Core Competencies for Early Care and Education Professionals is affirmed as another opportunity to connect and coordinate all early childhood programs.

Comments for section 126-28-15 Program Oversight

Comments for section 126-28-16 Financing

126-28-16.2 Careful consideration must be given to the removal of the provision that services be provided at no cost to the parent/guardian with the proviso that WV Pre-k services are considered an "enhancement" and no charge will be made for the enhanced services. In some areas of the state, in particular small, rural communities, this has the potential to negatively impact child care center viability. If parents are offered the option of several full days at no cost in a public school setting vs. payment of child care fees but no additional charge in a center, centers are placed at an unfair disadvantage. Careful consideration of maximizing resources vs. supporting equitable partnerships must be further explored.

Comments for section 126-28-17 Program Evaluation

"X 126-28-17.1 Continued expectation of the annual use of the ECERS-R as a guidance tool for classroom evaluation is affirmed in recognition of its significance in achieving quality learning environments. This section could be strengthened by noting an expectation for use of the ECERS-R to develop continuous quality improvement plans.

"X 126-28-17.5 It would be most beneficial to West Virginia's children and families if a system of research was developed in collaboration with all partners and track all variables related to quality early education experiences.

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Tuesday, June 14, 2005 9:17 AM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2005-06-14 09:17:21)

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Comment Received for Policy 2525

#####

Name: Patricia J. Gracey
Organization: Caliber Associates Region III ACF
Email: Pat-Gracey@comcast.net
Title: Head Start Technical Asst. Specialist
Address1: 12 Boxwood Circle
Address2:
City/State/Zip: Wheeling, WV 26003
Role: Professional Support
Posted: 2005-06-14 09:17:21
Posted from IP: 67.163.242.216

Comments for section §126-28-1 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 Waivers

Comments for section §126-28-8 Personnel Standards

Comments for section §126-28-9 Regulation of Facilities

Comments for section §126-28-10 Standards for Preparing Students

Comments for section §126-28-11 Curriculum and Assessment

Comments for section §126-28-12 Transition and Continuity

Comments for section §126-28-13 Inclusive Environments

Comments for section §126-28-14 Staff Development and Training

Comments for section §126-28-15 Program Oversight

The policy must have a procedure for questioning and commenting on the implementation of the approved county plans.

The policy must have a grievance procedure that addresses and remediates actions when county partners do not comply with the approved county plan.

Comments for section §126-28-16 Financing

Comments for section §126-28-17 Program Evaluation

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Wednesday, June 15, 2005 9:01 AM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2005-06-15 09:00:46)

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Comment Received for Policy 2525

#####

Name: L. Kay Carpenter
Organization: Webster County Board of Education
Email: lois@access.mountain.net
Title: Superintendent
Address1: 315 S. Main Street
Address2:
City/State/Zip: Webster Springs, WV 26288
Role: Superintendent
Posted: 2005-06-15 09:00:46
Posted from IP: 168.216.58.226

Comments for section §126-28-1 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

5.3--County attendance policies should include requirements of 2525. Have county's attach their policies or better require attendance policies to be on file and reviewed during OPEA audit...less paper work

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

Comments for section §126-28-7 Waivers

Comments for section §126-28-8 Personnel Standards

Comments for section §126-28-9 Regulation of Facilities

9.7 = See letter sent to County Superintendents from Lisa Burton on June 8, 2005 concerning enrollment of student's without immunizations..

Comments for section §126-28-10 Standards for Preparing Students

Comments for section §126-28-11 Curriculum and Assessment

Comments for section §126-28-12 Transition and Continuity

Comments for section §126-28-13 Inclusive Environments

Comments for section §126-28-14 Staff Development and Training

Comments for section §126-28-15 Program Oversight

Comments for section §126-28-16 Financing

Comments for section §126-28-17 Program Evaluation

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Wednesday, June 15, 2005 10:46 AM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2005-06-15 10:45:50)

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Comment Received for Policy 2525

Name: Candis Clark
Organization: Wetzel County School
Email: canclark@access.k12.wv.us
Title: Elementary Coord./Title 1 Director
Address1: 333 Foundry St.
Address2:
City/State/Zip: New Martinsville, West Virginia 26155
Role: School System Staff
Posted: 2005-06-15 10:45:50
Posted from IP: 168.216.129.17

Comments for section §126-28-1 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 Waivers

Comments for section §126-28-8 Personnel Standards

Comments for section §126-28-9 Regulation of Facilities

9.3-Need to clarify "qualified" staff 9.4 For all new staff or all staff annually? 9.9
Needs to be reworded to avoid lawsuits 9.14-9.15- 9.16--Existing school facilities were
not built to preschool regulations(other children use the same facilities--No monies
available to build new facilities. We need to be regulated by our own existing

regulations. 9.19.3 Provide opportunities, not mandates. 9.22 Notify families should be sufficient. 9.26-9.26.5--School facilities have their own regulations that they need to adhere to. Other children of varying ages utilize the facilities.

Comments for section §126-28-10 Standards for Preparing Students

Comments for section §126-28-11 Curriculum and Assessment

Comments for section §126-28-12 Transition and Continuity

Comments for section §126-28-13 Inclusive Environments

13.1 It appears that by 'providing fully inclusive early childhood classrooms' would violate PL 94-142 and State Board Policy 2419 by not offering a full continuum of placements to meet individual needs.

Comments for section §126-28-14 Staff Development and Training

Comments for section §126-28-15 Program Oversight

Comments for section §126-28-16 Financing

Comments for section §126-28-17 Program Evaluation

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Wednesday, June 15, 2005 11:33 AM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2005-06-15 11:33:14)

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Comment Received for Policy 2525

#####

Name: Deborah Novotny
Organization: Wetzel County Schools
Email: dnovotny@access.k12.wv.us
Title: Special Education Director
Address1: 333 Foundry Street
Address2:
City/State/Zip: New Martinsville, WV 26155
Role: School System Staff
Posted: 2005-06-15 11:33:14
Posted from IP: 168.216.129.17

Comments for section §126-28-1 General

9.3- Need to clarify "qualified staff" 9.4 For all new staff or all staff annually?
9.9 Needs to be reworded to avoid lawsuits 9.14-9.15-9.16-- Existing school facilities
were not built to preschool regulations (other children use the same facilities -- No
funds available to build new facilities. We need to be regulated by our own existing
regulations. 9.19.3 Provide opportunities for students, not mandates.

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 Waivers

Comments for section §126-28-8 Personnel Standards

Comments for section §126-28-9 Regulation of Facilities

Comments for section §126-28-10 Standards for Preparing Students

Comments for section §126-28-11 Curriculum and Assessment

Comments for section §126-28-12 Transition and Continuity

Comments for section §126-28-13 Inclusive Environments

13.1 It appears that by "providing fully inclusive early childhood classrooms" we would be in violation of IDEA and Policy 2419 by not offering a full continuum of placements to meet individual needs.

Comments for section §126-28-14 Staff Development and Training

Comments for section §126-28-15 Program Oversight

Comments for section §126-28-16 Financing

Comments for section §126-28-17 Program Evaluation

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Wednesday, June 15, 2005 12:55 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2005-06-15 12:54:49)

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Comment Received for Policy 2525

#####

Name: Stella Moon

Organization: Wood County Family Resource Network

Email: woodcountyfrn@zzzip.net

Title: Executive Director

Address1: 914 Market Street, Suite 304

Address2:

City/State/Zip: Parkersburg, WV 26101

Role: Community Member

Posted: 2005-06-15 12:54:49

Posted from IP: 209.197.38.98

Comments for section §126-28-1 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

Please maintain that 50% of the classrooms for eligible children must be contracted with qualifying providers in collaborative settings. Wood County is blessed with quality child care centers who are willing to collaborate. The public school system makes collaborating difficult and continually reminds the Wood County Pre-k Collaborative Committee that they are the only entity outside of Head Start that has money to fund the Pre-k Program. Secondly, a county school representative would like to limit participation by the community to the six mandated representatives. The county collaborative representation should be strengthened to include those six representatives plus at a minimum three additional representatives from the optional representative list; thus having nine required signatures/partners. This would enable "neutral" partners to have a vote (signature would be required on plan) since the child care, Head Start and parent representatives, at times, are hesitant to voice an opinion contrary to the public school system. In Wood County, we have a well-established Early Childhood Coalition that has worked well together for years. One of Wood County Schools' representatives has made it difficult to collaborate, refused to use the Partnership Application approved by the Collaborative Committee, and sometimes overrules the Committee's decisions or

recommendations. This has created friction on the Pre-K Collaborative Committee and has unfortunately reaffirmed the perception that a huge, governmental entity uses bully tactics to get its way.

Comments for section §126-28-7 Waivers

Comments for section §126-28-8 Personnel Standards

Comments for section §126-28-9 Regulation of Facilities

The public school classroom should be held to the same child care licensing standards as a licensed child care/Head Start center. Allowing the public school system to set its own standard is not in the best interest of the child. Typically public school classrooms are smaller and the lack of space does not lend itself to being as child friendly as the licensed centers' classrooms. Secondly, by changing the policy, a double standard is being established, thus reducing the level playing field and further hindering collaborative efforts. What applies to one entity will not apply to another entity.

Comments for section §126-28-10 Standards for Preparing Students

Comments for section §126-28-11 Curriculum and Assessment

Comments for section §126-28-12 Transition and Continuity

Comments for section §126-28-13 Inclusive Environments

Comments for section §126-28-14 Staff Development and Training

Comments for section §126-28-15 Program Oversight

Comments for section §126-28-16 Financing

Comments for section §126-28-17 Program Evaluation

Jodi Hoff

From: Cathy Jones [ctrjones@access.k12.wv.us]
Sent: Wednesday, June 15, 2005 1:45 PM
To: bjhoff@access.k12.wv.us
Subject: FW: Comment Received for Policy 2525 (2005-06-14 16:10:27)

Cathy R. Jones, Ed.D.
Early Childhood/Even Start Coordinator
WV Dept. of Education
1900 Kanawha Blvd, East
Building 6, Room 722
Charleston, WV 25305
Phone: (304)558-8099x212
Fax: (304)558-1613
ctrjones@access.k12.wv.us

-----Original Message-----

From: Nobody [mailto:nobody@wvde.state.wv.us]
Sent: Tuesday, June 14, 2005 4:10 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2005-06-14 16:10:27)

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This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 2525

#

Name: Lena Rapp
Organization: Nicholas Community Action Partnership
Email: lrapp@ncapwv.org
Title: Head Start Director
Address1: 1205 Broad Street
Address2:
City/State/Zip: Summersville, WV 26651
Role: Community Member
Posted: 2005-06-14 16:10:27
Posted from IP: 66.109.163.158

Comments for section §126-28-1 General

Comments for section §126-28-2 Guidelines

Comments for section §126-28-3 Definitions

3.16 - When will the procedure manual be available? It would be effective to have practitioners of Head Start, Pre-school and Child Care involved in this process. It would also be helpful to have "front line" administrators

involved in the development of this manual.

3.19 - I believe the definition of "staff member" should not include people who are not compensated for their service.

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

4.1.1 - I believe their needs to be meaningful documentation to prove these face-to-face conferences occur. Wording such as "the face-to-face conferences must be documented outlining what was reviewed and concerns the parent/guardian may have".

Comments for section §126-28-5 Attendance

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

6.3 - I think it is important to keep reviewing and revising plans every year.

6.4 - remove the word "negatively". This is too subjective.

6.5 - Thank you for maintaining the 50% existing resources requirement. This is helpful. It is bothersome to see the word "portion of money generated by the formula" as it relates to ensuring the requirements of the policy are met. We have seen that implementing preschool services is expensive and we must ensure that these funds are used to appropriately supply these classrooms and to make them a safe learning environment. I would like to see all funds generated by the formula for preschool be directed to the provision of services in these classrooms.

6.7 - Community Action should be capitalized instead of "community action".

6.9 - What will be the recourse if these standards are not met (Head Start Performance Standards and Child Care licensing).

6.12 - I would request that the due date for the annual contract be June 30th of each year rather than June 1. All partners are very busy at the beginning of the month of June with closing centers, completing inventories and closing out books. We are also just seeing what enrollment will look like for the following year and must have this information before submitting a contract.

Comments for section §126-28-7 Waivers

Comments for section §126-28-8 Personnel Standards

Comments for section §126-28-9 Regulation of Facilities

126-28-9 Regulation of Facilities

Thank you for incorporating these requirements. Although this is good to see this in the policy, I am deeply concerned about monitoring for the policy requirements. We need to see a defined frequency of monitoring visits by OEPA. I would like to see a frequency of once every two years. I

would like to see inclusion of collaborative partners in this process (interviews with Head Start Directors, Child Care Directors, who ever is involved in the administering of services). Principals need to be informed clearly that these classrooms fall within their responsibility of ongoing monitoring. OEPA needs to inform the administrators of the issues found and corrective actions to take. OEPA must be trained and use the same tool when monitoring pre-k sites across the state. Will they be utilizing the ECERS? Is there a standard tool they use when monitoring schools? Can we be assured that there will be special considerations when monitoring pre-k classrooms since the programmi! ng! is different than for k-12? Without clearly defined frequencies, tools used and consequences for non-compliance, collaborative partners are operating on very unstable ground. This could be a consequence to a collaborative partner that falls outside the control of a program but still are held responsible by their own funding source. I understand that this will take additional funding to ensure regular, frequent monitoring (once every two years). This is why I don't understand why the state can not utilize an existing resource: DHHR Licensing Specialists. Another resource that could be used is the Head Start PRISM (Program Review Instrument for Systems Monitoring) report. Head Start grantees are monitored at a minimum of every three years. The resulting report could possibly be forwarded to OEPA, Department of Education and local Boards of Education to ensure accountability.

9.7 - I would like to see additional wording that states "within 30 days of enrollment or a plan in place". This is due to situations of some low income families who have not had their children immunized on a regular schedule and therefore may be behind on some inoculations. We must insure that our most at risk children are receiving high quality services in these classrooms and are not excluded for a fault of a parent or guardian.

9.8 - "Programs shall adhere to the deadlines as prescribed by their primary funding source (providing 51% or more of the funding for that year)". This statement leads to some confusion. In 6.9 it states "In collaborative classrooms where community partners have regulations such as the Head Start Performance Standards or WVDHHR Day Care Licensing, these regulations shall apply in addition to WVBE Policy 2525.". I realize this section addresses screenings but I believe that some people will take this out of context and apply it to another section of the policy. It is also hard to operate under different timelines. Maybe wording such as: "most stringent requirement will be followed".

9.27.3 - An additional staff person should be used on buses transporting four year old children.

Comments for section §126-28-10 Standards for Preparing Students

10.1 - Thank you for keeping "Children shall be assessed on their individual developmental progress along the developmental continuum." This is very important and I would expect everyone will be monitoring for this.

Comments for section §126-28-11 Curriculum and Assessment

11.2 - I think "extended periods of sitting" needs to be defined. No more than twenty minutes.

11.6 - Stick turning seems to be a widely used practice of managing behaviors in pre-k classrooms and therefore warrants this to be identified in this section with the other inappropriate practices sited.

Comments for section §126-28-12 Transition and Continuity

Comments for section §126-28-13 Inclusive Environments

Comments for section §126-28-14 Staff Development and Training

Comments for section §126-28-15 Program Oversight

Comments for section §126-28-16 Financing

16.2 - I feel this section needs to be elaborated on. Teaching staff are in the habit of requesting parents to purchase supplies at the beginning of the year. Language that addresses this may need to be added. Adding an additional sentence between the first and second that states "Program staff shall not request parents/guardians to purchase supplies nor provide money for field trips or other services".

Comments for section §126-28-17 Program Evaluation

126-28-17 Program Evaluation

I think the use of the ECERS-R is very good. We must ensure we have reliable, consistent evaluators. I don't see an outcome for an "unfavorable" ECERS-R evaluation. My understanding is that an improvement plan must be submitted to the state Department of Education. Can this be included in this section in some way? Can a system be implemented that includes the review and signing by collaborative partners of the report that is sent to the state?

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

COMMENT PERIOD ENDS:

COMMENT RESPONSE FORM

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

Name : Sharon Meadows Organization: Raleigh County Community Action Association
Head Start

Title: Head Start Director

Street Address: POB 3066, EBS

City: Beckley State: WV Zip: 25801

Please check the box below that best describes your role.

- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> <u>School System Superintendent</u> | <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 | Community Member |

COMMENTS/SUGGESTIONS
§126-28-1. General – No Comments
§126-28-2. Guidelines 2.1.6 – “state approved” curricula...We would like to interject the ongoing role of PIECES and the appropriate subcommittee(s) in the approval process for curricula, assessments and curricula enhancements.

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9.21.2 – We strongly recommend that information about allergies and acute physical conditions be available upon enrollment rather than within 30 days.

9.22 – We recommend adding: "...and share with the child's family."

9.26 – We recommend adding the following sections (numerical order not important):

- Playground must be checked daily for hazards.

- Playground must a sufficient amount of age appropriate equipment to support gross motor development and to comply with ADA standards.

- Safe use zones must be defined around age appropriate playground equipment.

9.27 – Although much debate has gone forth about this issue and the current suggested policy represents compromise, Head Start still remains committed to the use of

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<p>§126-28-11. Curriculum and Assessment 11.1 – We recommend adding to the last sentence: “...<u>including preschool special needs classrooms.</u>” 11.2 - We recommend that the use of student desks in WV-Pre-k classrooms be prohibited. - Also, we recommend that “extended periods of sitting” be defined. 11.6 – We affirm this statement and reiterate that “long periods of sitting” be defined.</p>
<p>§126-28-12. Transition and Continuity – No comments.</p>
<p>§126-28-13. Inclusive Environments We recommend adding a 13.4 which requires the use of an approved WV Pre-k curriculum and assessment system in pre-k special needs classrooms.</p>
<p>§126-28-14. Staff Development and Training 14.1 – We recommend reinstating the 18 hour requirement for professional development. 14.3 – We recommend reinstating the 36 hour requirement for training on the comprehensive curriculum and assessment systems. - We further recommend striking “...in lieu of...” from the last sentence. We recommend adding a section “14.4” which would require partners in collaborative settings to provide training on appropriate regulations, such as Head Start Performance Standards and/or WVDHHR Day Care Licensing.</p>
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We strongly recommend that language be included which addresses the use of ECERS-R results at the local level as well as from the state perspective. This has proven to be a useful tool in helping identify issues important to collaborative partners, however consequences for poor scores, especially when done independently, have not been defined or response required.

17.1 Strike "the" before June 30.

17.3 – Define "who" will raise concerns that result in a qualified outside evaluator assessing the program utilizing the ECERS-R. To whom will the report be sent? In addition, what will be the consequences once the independent report is released?

Please direct all comments to:

Dr. Cathy Jones, Coordinator Pre-k Early Childhood Programs
Division of School Improvement Services
West Virginia Department of Education
Capitol Building 6, Room 722
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-1613

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

COMMENT PERIOD ENDS:

COMMENT RESPONSE FORM

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Name : Teresa Hicks Organization: Raleigh County Community Action Association Head Start

Title: Child Development/Education coordinator

Street Address: POB 3066, EBS

City: Beckley State: WV Zip: 25801

Please check the box below that best describes your role.

School System Superintendent

Principal

Professional Support Staff

School System Staff

Teacher

Service Personnel

Parent/Family

Business/Industry

Community Member

COMMENTS/SUGGESTIONS

§126-28-1. General – No Comments

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126CSR28

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Capitol Building 6, Room 722
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
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Name : Becky Gooch Erbacher Organization: WV Head Start Association & Beth Marquart, WV Community Action Partnership – Joint
Comments _____

Title: Executive Director, WVHSA - On behalf of WVHSA and Executive Director, WVCAP

Street Address: 170 Chapel Rd

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 |
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§126-28-7. Waivers – No comment.

§126-28-8. Personnel Standards

8.1 – It has been the experience in some settings where individuals holding elementary certification with no Pre-k-K endorsement have been “grandfathered” in to teaching in WV Pre-k classrooms. Is this permissible under this policy language, and if so could it be made more clear that this is possible?

8.2.1, 8.2.2, and 8.2.3 – We find the addition of “...and have 25% of the required coursework for one of the qualifying certifications...” very problematic. At minimum, “25% of the required coursework” is vague and leads to a multitude of interpretations and confusion. For example, does this mean the holder of an Associate’s Degree automatically has 25% of the coursework or is specific courses required? We would prefer this requirement be struck in order to facilitate the involvement of community partners to the fullest extent possible and maximize pre-k resources.

8.3 – We recommend reconsidering the strike out of the last sentence, but reinstate it with Level III instead of Level V.

§126-28-9. Regulation of Facilities

9.1 – With the suggested utilization of OEPA county auditing process, we strongly recommend that a frequency of no less than every two years be required for WV Pre-k settings and that a tool specific to the requirements of this policy be utilized by trained and qualified individuals. It has been the experience of some of the Head Start partners that ongoing monitoring and resulting program improvement and compliance has been very difficult. Any assurances that can be put into policy as well as practice are necessary to support collaboration and maximization of resources.

- The Head Start community would also like to recommend a reconsideration of the role of DHHR child care licensing staff as having a part in monitoring and quality assurance.

-We further recommend that the use of ECERS-R reports have significance in the monitoring process and that local ECERS-R teams include, at minimum, collaborative partners in addition to outside/independent participants.

9.3 – We strongly recommend that ratios be maintained during nap time.

9.6 – In collaborative settings, the stricter requirements must be met. Where Head Start participates, 3.5 hours of service must include a meal rather than just a snack.

- Also, we recommend adding: "...children and staff are seated together when eating."

9.7 – We recommend that: "All children entering an approved participating WV Pre-k classroom must have appropriate immunizations as defined by the American Academy of Pediatrics within 30 days of enrollment or, at minimum, a plan in place for reaching full compliance within 30 days."

9.8 – This conflicts with Head Start Performance Standards in that, regardless of percentage of funding, the requirements of the Standards must be met in all Head Start classrooms.

9.9 – We recommend using the term: "paid staff members".

9.12.5 – We recommend adding: "yelling or screaming with a loud voice"

We recommend adding: "9.12.11 Withholding food as punishment."

9.14 – We affirm the retention of 35 square feet per child, however, request that "in the classroom" be added.

- In addition, we recommend that a definition of "useable classroom space" be included in section 3 – Definitions.

9.17 – We affirm the retention of supervised tooth brushing as a requirement for WV Pre-k classrooms. We recommend that this be a "daily" practice.

9.20 – We recommend striking "...and circumstances...". We further recommend that rain also be a factor, besides temperature, to consider in excusing outdoor play.

-We also recommend adding 30 minutes of outdoor play in classrooms that operate less than 4 hours per day.

9.21 – We affirm the inclusion of a "health assessment" or physical in the requirements of this section.

9.21.2 – We strongly recommend that information about allergies and acute physical conditions be available upon enrollment rather than within 30 days.

9.22 – We recommend adding: "...and share with the child's family."

9.26 – We recommend adding the following sections (numerical order not important):

- Playground must be checked daily for hazards.

- Playground must a sufficient amount of age appropriate equipment to support gross motor development and to comply with ADA standards.

- Safe use zones must be defined around age appropriate playground equipment.

9.27 – Although much debate has gone forth about this issue and the current suggested policy represents compromise, Head Start still remains committed to the use of

126CSR28

§126-28-10. Standards for Preparing Students

We affirm the content of this section, particularly the last sentence with regards to child assessment.

§126-28-11. Curriculum and Assessment

11.1 – We recommend adding to the last sentence: “...including preschool special needs classrooms.”

11.2 - We recommend that the use of student desks in WV-Pre-k classrooms be prohibited.

- Also, we recommend that “extended periods of sitting” be defined.

11.6 – We affirm this statement and reiterate that “long periods of sitting” be defined.

§126-28-12. Transition and Continuity – No comments.

§126-28-13. Inclusive Environments

We recommend adding a 13.4 which requires the use of an approved WV Pre-k curriculum and assessment system in pre-k special needs classrooms.

§126-28-14. Staff Development and Training

14.1 – We recommend reinstating the 18 hour requirement for professional development.

14.3 – We recommend reinstating the 36 hour requirement for training on the comprehensive curriculum and assessment systems.

- We further recommend striking “...in lieu of...” from the last sentence.

We recommend adding a section “14.4” which would require partners in collaborative settings to provide training on appropriate regulations, such as Head Start Performance Standards and/or WVDHHR Day Care Licensing.

§126-28-15. Program Oversight

15.1 – We strongly recommend that language be included in this section that defines who holds the LEA accountable for compliance with standards and what happens in the event of an impasse at the local level. Who is responsible for assuring resolution and what role, if any, does the state play in these situations?

- We further recommend that the reporting required in the former 16.3 be reinstated.

§126-28-16. Financing

We recommend the reinstatement of the former section: 17.2.

We further recommend that a section be added which states that WV Pre-k classrooms added to the system that are not a part of the approved plan will not receive state aid formula funds.

§126-28-17. Program Evaluation

We strongly recommend that language be included which addresses the use of ECERS-R results at the local level as well as from the state perspective. This has proven to be a useful tool in helping identify issues important to collaborative partners, however consequences for poor scores, especially when done independently, have not been defined or response required.

17.1 Strike “the” before June 30.

17.3 – Define “who” will raise concerns that result in a qualified outside evaluator assessing the program utilizing the ECERS-R. To whom will the report be sent? In addition, what will be the consequences once the independent report is released?

Please direct all comments to:

Dr. Cathy Jones, Coordinator Pre-k Early Childhood Programs
Division of School Improvement Services
West Virginia Department of Education
Capitol Building 6, Room 722
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-1613

COMMENT RESPONSE FORM

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

Name : April Puzzuoli Organization: Concord University

Title: Professor of Early Childhood Education

Street Address: _____ PO Box 1000; Wall Box

City: Athens State: WV Zip: 24712-1000

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 checked="" type="checkbox"/> <u>Teacher</u> | <input type="checkbox"/> |
| <input type="checkbox"/> Professional Support Staff | <input type="checkbox"/> Service Personnel | Business/Industry |
| | | <input type="checkbox"/> Community Member |

COMMENTS/SUGGESTIONS
§126-28-1. 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. Waivers
§126-28-8. Personnel Standards
<p><u>Not all state Preschool Special Needs Teachers are prepared to work with young children without disabilities. With the move toward greater inclusive classrooms and settings, certification in Early Education should be required.</u></p>

§126-28-9. Regulation of Facilities

Transportation: Where children are transported on school buses without booster seats, will this not be in conflict with the upcoming law on requiring booster seats for small children?

Outdoor play: There are definitely times that temperature below 40 degrees are acceptable and would be healthy for children to play out doors. Conditions vary considerably depending on the wind chill and having children dressed properly.

What about the occasional use of sanitizing gel by the adults? I see this being done in classrooms and think that it is acceptable within reason.

I appreciate the additional details on safe play yards.

§126-28-10. Standards for Preparing Students

§126-28-11. Curriculum and Assessment

This is an excellent section, which has a wealth of supportive research behind it.

Overall the proposed policy is supportive of high quality programming recognized by professional associations and supported through documented research in the early childhood.

The additional expectations on discipline are definitely needed.

§126-28-12. Transition and Continuity

§126-28-13. Inclusive Environments

Policy is fine as it is. Great!

§126-28-14. Staff Development and Training

§126-28-15. Program Oversight

§126-28-16. Financing

§126-28-17. Program Evaluation

While it is understandable that teachers not be rating their own rooms for reporting purposes, there is value in teachers doing a self-evaluation in order to develop a deeper understanding of the standards by which their classrooms are being evaluated. I recommend self-evaluation precede the external evaluations.

There is an expanded version of ECERS-R available that includes all of the notes that were available on-line and much of what has been in *All About ECERS*. This version of the Revised Scale sets a considerably higher standard of expectations than what has been in use throughout the state.

Will all programs be expected to comply with the latest edition? If so, when? Will trainers and staff be provided training before counties are expected to use this edition?

Please direct all comments to:

Dr. Cathy Jones, Coordinator Pre-k Early Childhood Programs
Division of School Improvement Services
West Virginia Department of Education
Capitol Building 6, Room 722
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-1613

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Wednesday, June 15, 2005 6:13 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2005-06-15 18:13:12)

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=549fdfaccc4986f2f17102a1ac17f96d>
This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 2525

#####

Name: Ruth Ann Ponzurick
Organization: NCWVCAA
Email: raonzurick@ncwvcaa.org
Title: Children Services Director
Address1: 213 Jackson Street
Address2:
City/State/Zip: Fairmont, WV 26554
Role: Business-Industry
Posted: 2005-06-15 18:13:12
Posted from IP: 63.66.162.248

Comments for section §126-28-1 General

Please note I affirm ALL comments in each section previously submitted by Becky Gooch Erbacher on behalf of the WV Head Start Association

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 Waivers

Comments for section §126-28-8 Personnel Standards

8.3
S.T.A.R.S career pathway Level II (as stated)for aides, assistantcs, or paraprofessionals may be in conflict as required for BOE aides/paraprofessionals. Recommend Level to be redefined at a minimum of Level III or equivilant to those required by BOE.

Comments for section §126-28-9 Regulation of Facilities

Comments for section §126-28-10 Standards for Preparing Students

Comments for section §126-28-11 Curriculum and Assessment

Comments for section §126-28-12 Transition and Continuity

Comments for section §126-28-13 Inclusive Environments

Comments for section §126-28-14 Staff Development and Training

Comments for section §126-28-15 Program Oversight

Comments for section §126-28-16 Financing

Comments for section §126-28-17 Program Evaluation

Jodi Hoff

From: Cathy Jones [ctrjones@access.k12.wv.us]
Sent: Thursday, June 16, 2005 11:14 AM
To: bjhoff@access.k12.wv.us
Subject: FW: Comment Received for Policy 2525 (2005-06-16 10:22:54)

Jodi,
We may have already received these under Rebecca King's name. Cathy

Cathy R. Jones, Ed.D.
Early Childhood/Even Start Coordinator
WV Dept. of Education
1900 Kanawha Blvd, East
Building 6, Room 722
Charleston, WV 25305
Phone: (304)558-8099x212
Fax: (304)558-1613
ctrjones@access.k12.wv.us

-----Original Message-----

From: Nobody [mailto:nobody@wvde.state.wv.us]
Sent: Thursday, June 16, 2005 10:23 AM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2005-06-16 10:22:54)

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=549fdfaccc4986f2f17102alac17f96d>
This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 2525

#

Name: Jeff Neccuzi
Organization: WV Immunization Program
Email: JeffNeccuzi@wvdhhr.org
Title: Director, WV Immunization Program
Address1: 350 Capitol Street
Address2:
City/State/Zip: charleston, wv 25301
Role:
Posted: 2005-06-16 10:22:54
Posted from IP: 129.71.238.253

Comments for section \$126-28-1 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 Waivers

Comments for section §126-28-8 Personnel Standards

Comments for section §126-28-9 Regulation of Facilities

West Virginia Bureau for Public Health, Division of Surveillance and Disease Control, Immunization Program submitted written official guidance on 6/15/2005 to WV Department of Education regarding the clarification of age appropriate immunizations. These written guidelines addresses the pre-kindergaten institutions in addition to immunization of children enrolled in any pre-school programs in general. These guidelines were are in accordance with the most current harmonized immunization schedule which is approved by the American Academy of Pediatrics(AAP), American Academy of Family Physicians(AAFP) and the Department of Health and Human Services,U.S. Public Health Service Advisory Committee on Immunization Practices(ACIP). However, please note that these immunization guidelines do not reference WV Compulsory School Immunization Law(16-3-4) but rather what's needed by children in order to help protect them and those they will be in contact with in the various pre-school environme! nt! s. Thanks in advance for allowing WV Bureau for Public Health representatives of the Immunization Program to provide assistance to this draft policy.

Comments for section §126-28-10 Standards for Preparing Students

Comments for section §126-28-11 Curriculum and Assessment

Comments for section §126-28-12 Transition and Continuity

Comments for section §126-28-13 Inclusive Environments

~~Comments for section §126-28-14 Staff Development and Training~~

Comments for section §126-28-15 Program Oversight

Comments for section §126-28-16 Financing

Comments for section S126-28-17 Program Evaluation

Cathy Jones

From: Nobody [nobody@wvde.state.wv.us]
Sent: Wednesday, June 15, 2005 4:46 PM
To: fibanez@wvde.state.wv.us; ctrjones@access.k12.wv.us
Subject: Comment Received for Policy 2525 (2005-06-15 16:45:38)

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=549fdfaccc4986f2f17102a1ac17f96d>
This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 2525

#####

Name: A,my Keatley
Organization:
Email: Keatley3@aol.com
Title:
Address1: 2215 Kay Neva Lane
Address2:
City/State/Zip: Charleston, wv 25312
Role: Parent-Family
Posted: 2005-06-15 16:45:38
Posted from IP: 205.188.117.10

Comments for section §126-28-1 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

This policy needs to be better defined concerning home visits. The federal register CFR Title 45 subpart C 1304.40 (i)(3) Parental Involvement in Home Visists states the grantee and delegate agencies must schedule home visits at times that are mutually convenient for the parents or primary caregivers. IN SUBpart c 1306.34 requirements for home visits 1306.34 (c)(1) home visits must last for a minimum of 1 and 1/2 hours each.

I feel that this needs to be reflected in section126-28-4 because I have had a problem with Bonham Elem. just showing up and not scheduling the home visit. They can show up at any hour of the day from 8 to 2.30 on any Friday that there is no head start. This is there idea of scheduling a home visit. If you ask when your next home visit is, they say it is on your calender. It only stated no school on the Fridays, nothing else. After meeting with Principle, teacher, and preschool coordinator, they stated it works for them. They then gave a new calender out after the meeting, and now it has on Fridays printed "home visits/conferences" but again, it does not state the person they are visiting, the hour of day, or which friday they will come to a particular persons house. This is not a parent friendly policy, but they say they have no complaints and will continue to do so. They did offer to schedule a home visit with me, but i dont know why I would have to since it is supposedly all ready scheduled. They do not tell you this. How are other parents going to know this is wrong? They dont tell you, and only after a 20 min discussion that it is not scheduled on calenders, which they insiste! d ! they were, did they break down an say they would schedule them! Please help.

Comments for section §126-28-5 Attendance

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

Comments for section §126-28-7 Waivers

Comments for section §126-28-8 Personnel Standards

Comments for section §126-28-9 Regulation of Facilities

Comments for section §126-28-10 Standards for Preparing Students

Comments for section §126-28-11 Curriculum and Assessment

Comments for section §126-28-12 Transition and Continuity

Comments for section §126-28-13 Inclusive Environments

Comments for section §126-28-14 Staff Development and Training

Comments for section §126-28-15 Program Oversight

Comments for section §126-28-16 Financing

Comments for section §126-28-17 Program Evaluation

126CSR28

POLICY2525: West Virginia's Universal Access to Early Education System

COMMENT PERIOD ENDS:

COMMENT RESPONSE FORM

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

Name : Irene Murphy Organization: Jackson Co. Schools
Title: Director
Street Address: P.O. Box 770
City: Ripley State: WV Zip: 25271

Please check the box below that best describes your role.

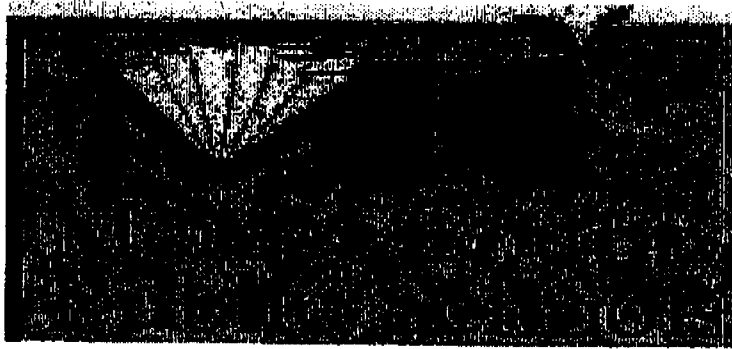
- School System Superintendent [] School System Staff [X] Parent/Family []
Principal [] Teacher [] Business/Industry []
Professional Support Staff [] Service Personnel [] Community Member []

COMMENTS/SUGGESTIONS
§126-28-1. General

126CSR28

§126-28-7. Waivers**§126-28-8. Personnel Standards****§126-28-9. Regulation of Facilities****§126-28-10. Standards for Preparing Students****§126-28-11. Curriculum and Assessment**

I totally agree with the concept that this law is striving towards. However, to specifically say that flash cards is a teaching strategy that cannot be used is ridiculous. Also... there are some skills that ALL children NEED to work on! In some instances context should be taught in isolation.



1403 Honaker Avenue
Princeton, WV 24740
Phone: (304) 487-1551
Fax: (304) 425-5844

Date: 6/9/05

To: Mr. Cathy Jones

Agency: WVDE

Fax: 304-558-1613

From: Sharon Rye

Pages: (including cover sheet)

RE: Comment - Policy 2525
126-28-9

The information contained in this facsimile message is privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone and return the original message to us at the above address via the United States Postal Service. Thank you.

If you did not receive the number of pages indicated above, please call me at (304) 487- 1551.

126CSR28

POLICY2525: West Virginia's Universal Access to Early Education System**COMMENT PERIOD ENDS:****COMMENT RESPONSE FORM**

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

Name: Sharon Dyer Organization: Mercer County SchoolsTitle: Elementary SupervisorStreet Address: 1403 Honaker Ave.City: Princeton State: WV Zip: 24740

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

§126-28-1. General

126CSR28

§126-28-9. Regulation of Facilities

See attached typed page.

§126-28-10. Standards for Preparing Students

§126-28-11. Curriculum and Assessment

§126-28-12. Transition and Continuity

§126-28-13. Inclusive Environments

§126-28-14. Staff Development and Training

§126-28-15. Program Oversight

§126-28-16. Financing

Comments/Suggestions for Policy 2525

126-18-9. Regulations of Facilities

The biggest concern I have is trying to retrofit the new regulations of Policy 2525 into our preexisting classrooms. Section 9.14 requires that there be a minimum of 35 square feet per child of usable indoor space. Some of our older buildings are not designed to meet this regulation. Under section 9.17, our county classrooms are not equipped with sinks. Therefore, pre-k students would have to brush their teeth in restrooms used by all students and would not be conducive to sanitary conditions. Section 9.26 requires that playground areas be fenced. School playgrounds are very large and would require a vast amount of fencing which would put a tremendous financial burden on our school system.

POLICY2525: West Virginia's Universal Access to Early Education System

COMMENT PERIOD ENDS:

COMMENT RESPONSE FORM

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

Name: Anne Seaker Organization: Tyler Co. Schools
 Title: Superintendent
 Street Address: PO Box 25,
 City: Middlebourne State: WV Zip: 26149

Please check the box below that best describes your role.

- | | | |
|--|--|--|
| <input checked="" 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 type="checkbox"/> Community Member |

COMMENTS/SUGGESTIONS

§126-28-1. General

The revisions to this policy are excellent. Public education pre-schools teachers are professionals who need to make decisions regarding individual students needs and not be micro managed by DHR's regulations for Head Start.

§126-28-9. Regulation of Facilities

9.20 Please eliminate this paragraph. Teachers should make the decision regarding amount of out-door time need - this is micro management! (Ok hr. if it is 40°)

§126-28-10. Standards for Preparing Students

§126-28-11. Curriculum and Assessment

§126-28-12. Transition and Continuity

§126-28-13. Inclusive Environments

§126-28-14. Staff Development and Training

§126-28-15. Program Oversight

§126-28-16. Financing

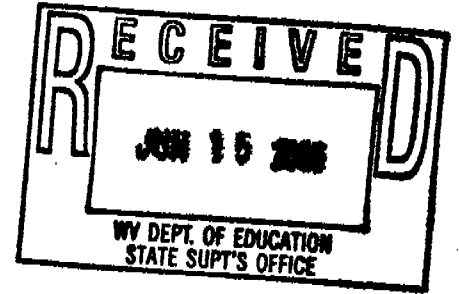


The Senate of West Virginia
Charleston

BILLY WAYNE BAILEY, JR.
SENATE MAJORITY WHIP
P. O. Box 1793
PINEVILLE 24874-1793

COMMITTEES:
GOVERNMENT ORGANIZATION
(VICE CHAIRMAN)
CONFIRMATIONS
EDUCATION
ENROLLED BILLS
FINANCE
MILITARY

June 15, 2005



Dr. David Stewart, Superintendent
West Virginia Department of Education
Building 6, 2nd Floor
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305

Dear Superintendent Stewart:

Enclosed are my comments on the proposed changes to Policy 2525. If you wish to discuss my comments with me, please feel free to contact me.

I believe that you should closely examine the language of Enrolled Senate Bill 247, passed by the Legislature in 2002. It is my opinion that changes you are proposing undermine the Legislature's intent regarding the safety and welfare of our preschoolers and their providers.

I urge you to examine the laws enacted by the Legislature in making your policy changes so that they reflect the criteria that the Legislature intended to be established.

Again, if you have any questions regarding my comments, you may reach me at my work number, (304) 294-8800, or at home, (304) 732-6405.

With best wishes and kind regards. I am,

Sincerely,

Billy Wayne Bailey, Jr.
Senate Majority Whip

Control
#5408

Comments on Proposed Changes to Policy 2525 Submitted by Senator Billy Wayne Bailey

6.3: It is essential that the LEA not open any new classrooms without the signatures of all the county collaborative team. The LEA should not be left to determine if the classroom will negatively impact a partner. Every new classroom should be a collaborative classroom unless all partners agree it should not be.

6.5: The 50% contracted classrooms are necessary to ensure the survival of private preschools and Head Start.

8.2.1 - 8.2.3 This section appears to be limiting the ability of community partners to participate in collaboration except as support staff. During negotiation over SB247, community partners were told that their teachers would be eligible to receive permits under Policy 2525. This change is undoing assurances that the legislature made to many preschool providers when passing SB247. I recommend removing the "...and have 25% of the required coursework for one of the qualifying certifications."

9.1 - 9.2: As younger and younger children enter the public school system, it is essential that we realize these children are still babies; therefore, all daycare licensing regulations should be followed by all providers. It is inherently unfair to require private preschools to follow daycare regulation but not require Boards of Education. If daycare regulations are in place to guarantee the health and safety of children, all preschoolers should be protected, not just the children attending private preschool and Head Start. I was startled and appalled to hear school superintendents state that basic health and safety regulations were too expensive or burdensome for them to follow. All preschool classrooms should be licensed by DHHR and follow the Daycare Licensing Regulations.

The Office of Education Performance Audits is not equipped to inspect preschool classrooms. These classrooms should be inspected and regulated by those that are the experts in preschool aged children (DHHR).

9.14: WV Pre-K classrooms should provide 35 square feet per child of usable classroom space. This section needs tighten to prevent including hallways, restrooms, etc. in the calculation of usable space.

9.15: This section should be tightened to require play areas to be equipped with age appropriate and adequate playground equipment and outdoor toys.

9.26: This section needs to remain as written to ensure the safety of preschool children.

9.27.2: The Legislature has implemented strict laws concerning the transportation of small children. Study after study has shown that children are safer in age and size appropriate restraint systems. Sitting preschool age children in a designated section of the bus is NOT sufficient to keep them safe. These preschool children should be transported