

WEST VIRGINIA
SECRETARY OF STATE

JOE MANCHIN, III

ADMINISTRATIVE LAW DIVISION

Form #5

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700 JAN 13 P 4:02

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, 18-5-18c, 18-2E-1 et seq., 18-5-17 and 18-5-44.

RULE TYPE: PROCEDURAL ☒ INTERPRETIVE ☐

EXEMPT LEGISLATIVE RULE ☐

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 ☐ NO ☒

IF YES, SERIES NUMBER OF RULE BEING AMENDED: _____

TITLE OF RULE BEING AMENDED: _____

IF NO, SERIES NUMBER OF NEW RULE BEING PROPOSED: 28

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

THE ABOVE RULE IS HEREBY ADOPTED AND FILED WITH THE SECRETARY OF STATE. THE
EFFECTIVE DATE OF THIS RULE IS February 12, 2003.



Steven L. Paine
Deputy State Superintendent of Schools

\$10.80 w/out comments
\$78.10 w/comments

Executive Summary

West Virginia's Universal Access to Early Education System (WV Pre-k) Policy 2525

BACKGROUND:

During the 2002 legislative session, WV code §18-5-44 (as a part of Senate Bill 247) was passed to provide universal access to high quality pre-kindergarten programs for all four year old children and three year old children as mandated under federal law by 2012-2013. Results from longitudinal research studies support the value of high quality pre-kindergarten programs for increased student success in school, increased high school graduation, increased gainful employment, decreased behavior programs, decreased grade retention and decreased special education placement.

The policy was developed with input from the Partners Implementing an Early Care and Education System Advisory Council (PIECES) that included representatives from Head Start, Child Care, the West Virginia Department of Health and Human Resources, the West Virginia Department of Education, local boards of education, legislative legal counsel, Community Action Programs, the Governor's office, and members of the community. The policy was on public comment from October 17 to November 22, 2002.

PURPOSE:

An estimated 20,000 children enter kindergarten each year with varying pre-kindergarten experiences. The purpose of the policy is to establish the criteria for approving and implementing WV Pre-k classrooms for all eligible children. The policy provides requirements for parent/guardian involvement and family support, attendance, collaboration and the county plan, waivers, personnel standards, regulation of facilities, standards for preparing students, curriculum and assessment, transition and continuity, inclusive environments, staff development and training, transportation, program oversight, financing, health and safety, and program evaluation.

COMMENT SUMMARY:

Comments were received from approximately 50 persons or groups. The comments were primarily of three types. About half the comments were positive and supportive in nature. Of the remaining half, one fourth were questions and one fourth expressed concerns or opposition. Concerns revolved mainly around minimum days/hours/week, teacher certification, eligible children definition, collaboration, and submission of the county collaborative plan. Revisions to the policy were made to clarify the questions and address the concerns.

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FILED

**TITLE 126
PROCEDURAL RULE
BOARD OF EDUCATION**

2003 JAN 13 P 4: 02

SERIES 28

OFFICE WEST VIRGINIA
SECRETARY OF STATE

West Virginia's Universal Access to 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 West Virginia's Pre-k System (WV Pre-k).

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

1.3. Filing Date. - - January 13, 2003

1.4. Effective Date. - - February 12, 2003

1.5. Repeal of former rule. - - None. This is a new rule.

§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. incorporate content standards and objectives, curriculum, and assessment 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. *Approved funding sources* means any funds used directly to support WV Pre-k classrooms for eligible children including school aid formula, Head Start funds, Even Start funds, Temporary Assistance to Needy Families, Child Care Development Funds, funds under the Elementary and Secondary Education Act, funds provided by the School Building Authority, funds under the Individuals with Disabilities Education Act, and any other private or public funds.

3.2. *Approved WV Pre-k participating programs* shall mean providers of early care and education services including, but not limited to, childcare, private preschool, Head Start, county school systems, 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.

3.3. *Collaborative Setting* means a classroom of WV Pre-k children whose services are supported by two or more partners. This could range from contracting with the county Board of Education for shared resources such as a certified teacher or classroom space to fully integrated, inclusive settings that combine a variety of funding sources and resources (including space),

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shared staffing responsibilities, and shared supervision and implementation of the program by two or more partners.

3.4. *Contracted program* shall mean any program that qualifies as an approved WV Pre-k participating program by meeting all of the requirements of this policy and has a contractual agreement with the county school system under the county collaborative plan to operate a classroom specific to this policy.

3.5. *County collaborative plan* means the plan each county school board is required to submit detailing 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.

3.6. *Developmentally appropriate* means early childhood programming, curricula, and activities that address the stages of each child's cognitive, physical, social/emotional, and cultural development.

3.7. *Eligible child* shall mean any child, regardless of ability, who is four by the first day of September of the year he/she is to enroll or whose enrollment is mandated under state and/or federal law. 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 by 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 and documented through an approved assessment.

3.8. *Minimum program availability* means offering each preschool class a minimum twelve hours per week on consecutive days during the school year calendar.

3.9. *West Virginia's Pre-k* means kindergarten for eligible children and may include, but is not limited to, developmental kindergartens, four-year-old kindergarten, and other programs provided by approved WV Pre-k participating programs that provide developmental readiness services for eligible children in West Virginia.

§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 parent/guardian/family face to face conferences annually. Home visits are recommended for these conferences.

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4.1.2. documented methods of communicating with parent/guardian 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 126CSR16, West Virginia Board of Education Policy 2419 - Regulations for the Education of Exceptional Students, for preschool children with disabilities which are integrated into the program and provided in accordance with the needs specified in the child's Individualized Education Program.

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

4.1.7. parents/guardians/families are welcomed as visitors and encouraged to observe children in the classroom and to participate with children in group 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 West Virginia 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.

5.2. Each county must make reasonable efforts 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 plan a provision for working with families whose children are chronically absent and/or tardy.

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

6.1. Each county board of education must submit a county plan (an original and six copies) to the Secretary of the West Virginia Department of Health and Human Resources. The initial plan is due June 27, 2003. All county plans are to be prepared in accordance with the County Plan for Services to Eligible Children document (attached).

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6.2 Once the county plans are approved by the Secretary of the West Virginia Department of Health and Human Resources, the plans will be forwarded by the Secretary's office to the West Virginia Board of Education 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.

6.3. Changes, updates and amendments to the county plans are to be submitted to the West Virginia Department of Health and Human Resources and the West Virginia Department of Education by 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 (see section 19.4).

6.4. 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 West Virginia Board of Education and the Secretary of the West Virginia Department of Health and Human Resources. 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 must begin phasing in providing services in collaborative settings by the school year beginning 2004.

6.5. The county collaborative planning 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. Documentation of this invitation and the response shall be submitted with the plan.

6.6. Other recommended members of the county collaborative planning team may include a representative from the West Virginia Birth to Three program, the parent/guardian educator resource centers, child care resource and referral agencies, Family Resource Networks,

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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.

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

6.8. Any member of the county collaboration planning team that will provide services to eligible children in that county must follow all rules and regulations as outlined in the state policy.

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

6.10. County plans will include a list of all programs invited to participate in the planning process regardless of whether the program chose to participate.

§126-28-7. Waivers.

7.1. The West Virginia Board of Education may grant a county board a waiver from full implementation of WV Pre-k in a county if the state board 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 the twenty-fifth day of March for the following school year.

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

§126-28-8. Personnel Standards.

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8.1. Teachers must hold a qualifying certification/endorsement, specifically, a teaching certification/ endorsement in early education (also called early childhood education), Prek-k endorsement, Preschool Special Needs or birth to five.

8.2. A full-time permit shall be issued and valid for one school year and shall expire on the thirtieth day of June. 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 126CSR136, West Virginia Board of Education Policy 5202 - Minimum Requirements for the Licensure of Professional/Paraprofessional Personnel and Advanced Salary Classification, Section 15. Full-time permits will be issued for:

8.2.1. persons with degrees in elementary education, child and family studies with an emphasis on early childhood education, or child development, 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, or

8.2.3. persons with an AA 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.

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 West Virginia State Registry and Training System (WV STARS) 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 0-1 years of experience and possess the ability to understand and practice the core competencies with direction and instruction or through sponsorship of a professional organization or qualified mentor (attached). Aides and assistants must have an individualized staff development plan for specifying his/her planned progression on the career in order to attain pathway level V within five years.

§126-28-9. Regulation of Facilities.

9.1. All approved participating WV Pre-k programs, see definitions, that are included in the county collaborative plan must meet the requirements as set forth in the West Virginia Department of Health and Human Resources Rule, Day Care Center Licensing, 78CSR1, or any rule promulgated to replace and/or update 78CSR1Public schools or other programs who are exempt under West Virginia Department of Health and Human Resources Rule, Day Care Center Licensing 78CSR1 or its replacement must meet the requirements set forth in that rule. In the case of public schools, West Virginia Department of Health and Human Resources Child Care Licensing staff will conduct monitoring visits of all areas related to the WV Pre-k program and any recommendations for action will be made to the Office of Education Performance Audits.

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Failure to correct any non-compliance findings within 18 months could jeopardize the approval of the county collaborative plan. Programs that wish to participate in WV Pre-k, but would otherwise be exempt under 78CSR1 except public schools, shall be licensed by the West Virginia Department of Health and Human Resources.

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

10.1. Programs participating in the county's collaborative plan must adhere to the West Virginia Department of Education's developmental continuum contained in the content standards and objectives for eligible children's programs which are aligned with the Head Start outcomes framework and 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. Once the list of accepted comprehensive curricula systems, curriculum enhancements, and comprehensive assessment systems is adopted, only comprehensive curricula systems, curriculum enhancements, comprehensive assessment systems that are included on the adopted list may be used by programs participating in the county plan.

11.2. Comprehensive curricula systems, curriculum enhancements and comprehensive assessment systems will be approved following the process established by the West Virginia Department of Education, including, preschool special education, for adoption of instructional materials.

11.3. Curriculum and assessment, along with the content standards and objectives, will be parts of an inter-related system that measures the child's progress on a continuum of development and are utilized to individualize the children's educational opportunities.

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.

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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:

a. meeting the developmental continuum contained in the content standards and objectives for eligible children as prescribed by the West Virginia Board of Education.

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.

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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.

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.

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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.

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.

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- 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
- h. art,
- 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 the WV Pre-k system and out of the WV Pre-k system into kindergarten. At a minimum the plan will include:

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12.1.1. an opportunity for the child and his/her family to visit the setting into which the child is transitioning, i.e. WV Pre-k or kindergarten classroom.

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 the Pre-k or kindergarten.

12.1.3. an opportunity for teachers/providers in the WV Pre-k system 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, on 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 Individualized Education Programs out of the WV Pre-k system and into kindergarten and children from the WV Birth to Three system will follow all state and federal requirements.

12.1.6. transition planning which follows the *West Virginia Childhood Transition Checklist* (attached).

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.

§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. 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. Each county plan will include a plan for providing a minimum of 18 hours annually for staff development related to high quality programming for eligible children based on a

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professional development needs assessment 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 (S.T.A.R.S.) training process (attached).

14.3. Every WV Pre-k teacher and assisting staff including aides, assistants, and paraprofessionals, must complete a total of 36 hours of training based upon the West Virginia curriculum/assessment standards over a 24 month period and provided by the employer or made accessible through the professional development section of the county collaborative plan. Thirty-six hours is the minimum and does not preclude teachers and assisting staff from taking a college credit bearing course of 45 hours on the West Virginia curriculum/assessment standards.

§126-28-15. Transportation.

15.1. 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.

15.2. Participating programs should make every effort to coordinate transportation systems to support families whose children would not otherwise be able to participate.

15.3. All participating programs must, at a minimum, follow the requirements of their primary funding source or the West Virginia TransporTots document, whichever is more stringent.

§126-28-16. Program Oversight.

16.1. Local program oversight, 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.

16.2. The West Virginia Board of Education or its designee and the Secretary of the West Virginia Department of Health and Human Resources or his/her designee will maintain state oversight.

16.3. On or before the second day of January, 2004, the Secretary of the West Virginia Department of Health and Human Resources and the West Virginia State Superintendent of Schools will submit a report to the Legislative Oversight Commission on Educational Accountability and the joint committee on government and finance which addresses, at a minimum:

16.3.1. a summary of the approved county plans for providing the early childhood education programs under this policy.

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16.3.2. an analysis of the total cost to the state and counties of implementing the plans.

16.3.3. a separate analysis of the impact of plans on counties with increased enrollment.

16.3.4. an analysis of the affect of the programs on the maximization of the use of federal funds for early childhood programs.

16.4 On or before the first day of December, 2004, and each year thereafter, the West Virginia State Board of Education shall report to the Legislative Oversight Commission on Educational Accountability.

§126-28-17. Financing.

17.1. Neither the West Virginia Board of Education nor the West Virginia Department of Education may provide any funds to any county for the purpose of implementing this policy unless the county has an approved plan as outlined herein.

17.2. Each county must include in the county collaborative plan an explanation of how money generated through the implementation of the eligible program will be used to support the participating programs in the county including contractual community programs and county school system provided programs.

17.3. 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.

§126-20-18. Health and Safety.

18.1. WV Pre-k classrooms shall limit classroom size to no more than twenty children per classroom. Ratios shall be maintained at 1 adult: 10 children with one adult being a certified teacher in accordance with §126-28-8, Personnel Standards.

18.2. 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 West Virginia Department of Education child and adult food program. Programs operating less than four hours will provide a snack as prescribed the West Virginia Department of Education child and adult food program.

18.3. Immunization. All children entering an approved participating WV Pre-k program shall follow the guidelines of the primary (providing 51% or more of the funding that year) funding source for that setting regarding immunization. Participating programs that operate within a public school facility must follow West Virginia Code §16-3-4.

18.4. Health Screenings. 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 West Virginia Code §18-5-17.

§126-28-19. Program Evaluation.

19.1. Beginning with the school year which starts in August 2004, all participating programs shall use the Early Childhood Environment Rating Scale (ECERS, 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 by the 30th day of June to the West Virginia Department of Education, Coordinator of Early Childhood, Building 6, Room 318, 1900 Kanawha Boulevard, East, Charleston, WV 25305-0330.

19.2. Programs will be assessed using the ECERS by a trained outside evaluator every five years or if concerns from the West Virginia Department of Education, West Virginia Department of Health and Human Resources or county board warrant assessment.

19.3. At which time the state has money and manpower to provide monitoring using the ECERS, programs may be required to have a trained outside evaluator evaluate the program more frequently.

19.4. At which time a county has fully implemented their county collaborative plan and all eligible children in that county have access to a WV Pre-k classroom, the county board of education is required to annually submit a copy of the ECERS evaluation for each approved participating WV Pre-k program, a summary of the WV Pre-k services provided in the county, a contractual agreement for each community partner providing services as an approved participating WV Pre-k program provider, the total number of WV Pre-k children served in each 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 Early Childhood Coordinator of the West Virginia Department of Education, by the 30th day of June (format attached). A copy of the report must be sent by the 30th day of June to the West Virginia Department of Health and Human Resources, Early Childhood Division.

19.5. The state shall develop and institute a system of longitudinal, scientific-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.

County Plan for Services to Eligible Preschool Children - 2003/04

County _____ Date Submitted _____
 County Superintendent of Schools _____

Designated Contact Person Regarding Application _____

Address _____ State _____ Zip Code _____

Phone _____ Fax _____

Email address _____

Core Partner Representatives Participating on Collaborative Planning Committee:

Core Partner	Signature	Printed Name	Agency
Public School Preschool			
Public School Preschool Special Needs			
Head Start			
Local DHHR Representative			
Licensed Child Care*			
Parent/Guardian of a preschool child			

Note: all core partners must attach a signed letter of agreement to the county plan documenting their participation in the plan

development process.

* Due to the nature of child care, every licensed child care program in the county must be extended an invitation to participate on the county planning team. Documentation of this invitation and the response must be submitted with the plan (2525 6.5 pg 5)

Other Partners participating on Collaborative Planning Committee (Note, these may include but not be limited to: a representative from the county Birth to Three program, Starting Points, Parent/Guardian Educator Resource Center representative, Child Care Resource and Referral agencies, Family Resource Networks, Early Parent/Guardian Education, local Apprenticeship For Child Development Specialist Council, health agencies, business, faith based early childhood program providers, Community Action Agency, child abuse prevention agencies, higher education, and/or other community organizations that work with young children and their families providing support and education)

Signature	Printed Name	Agency

Additional signature pages can be attached, if necessary.

Collaborative Plan Development: Describe the process utilized for plan development (agencies invited, number of meetings held, roles of participants, etc.):

Part I. Needs Assessments and Conclusions:

The needs assessment for this plan should be built on current data and may use needs assessments that have already been conducted for other purposes by participating agencies. The needs assessment for this plan shall include information about demographics of the county related to the early childhood program implementation, financial requirements for implementation, and potential sources of funding to assist implementation.

A. Assessment of the estimated number of four year old children in your county in relation to your school attendance areas (as defined by the School Building Authority) over the next 5 years (2003-2007):

Projected Number of Four Year Old Children Per School Year						
School Attendance Area	2003	2004	2005	2006	2007	
Total Projected Number						

B. Assessment of Current Early Childhood Programs. What four-year-old services are available in each school attendance area? (Head Start, Child Care, Private Preschool, Preschool Special Education, etc.)

Program Name	School Attendance Area	Type of Service*	Child Care Licensed/ Meets Licensing Y or N	No. Hrs/Day Days/Wk.	Transp. Provided Y or N	No. 3 year olds enrolled	No. 4 year olds enrolled	Adult/child ratio	Specific Curriculum Utilized

* Indicate type of service, ie. HS - Head Start, CC - Child Care, PSP - Public School Preschool, SN - Public School Preschool Special Needs, PPS - Private Preschool, etc. Where combination/collaborative programs exist, indicate initials of all participating partners.

C. Assessment of teacher certifications/qualifications:

[illegible]

Key: **A** - Early Education Certification; **B** - Pre-K-K Endorsement; **C** - Birth to Five Certification; **D** - Preschool Special Needs; **E** - Elementary Education; **F** - Child and Family Studies with Early Childhood Education; **G** - Child Development; **H** - Board of Regents Degree with Early Childhood/Child Development; **I** - AA Degree in Child Development/Early Childhood Plus One Year Early Education Teaching Experience; **J** - AA Degree in Occupational Development with Emphasis on Child Development/Early Childhood Plus One Year Early Education Teaching Experience

Analyze the assessment information indicated in A, B, and C above to determine findings, conclusions, and priorities for the development of your county plan for 2003-2004:

Analysis	Findings	Conclusions	Priority
Demographics - number of anticipated 4 year olds.			
Current Early Childhood Program Analysis			
Teacher Certifications / Qualifications			

Part II.

Early Childhood Education Implementation Plan

The overall goal of West Virginia's Pre-K program is to provide, beginning no later than the school year 2012 - 2013, quality comprehensive early childhood education programs for all children who have attained the age of four prior to the first day of September of the school year in which the pupil enters the early childhood education program

Based upon the needs assessment information compiled and conclusions and priorities established, identify your objectives and activities for school year 2003/2004 in order to comply with 126CSR126 West Virginia's Access to Early Education System (2525). Use the following format for each objective and related activities. In developing the county system for providing Universal Pre-K, provide specific details regarding the following sections of the procedural rule: 126-28-6 Collaboration and the County Plan, 126-28-12 Transition and Continuity, 126-28-13 Inclusive Environments, 126-28-14 Staff Development and Training, 126-28-15 Transportation, 126-28-16 Program Oversight, 126-28-17, 126-20-18.3 and .4 Health and Safety, and 126-28-19 Program Evaluation.

OBJECTIVE: _____			

ACTIVITIES		PERSON/AGENCY RESPONSIBLE	TIME LINE
			COST ESTIMATES/ RESOURCES

Use a separate form for each objective

BUDGET AND RESOURCE PLAN

Indicate below the defined objectives and activities, the source of funds and/or resources, the dollar amounts budgeted and/or committed to achieve the implementation of this plan.

Objective #	Activity	Source	Budgeted Amount/Resource Committed

Statement of Assurances

The submission of this plan signed by participating core partners along with the County Superintendent of Schools assures that WV Pre-K programs will comply with the following sections of Title 126 Procedural Rule Board of Education, Series 28, West Virginia's Universal Access to early Education System (2525):

(Note: All other sections of 126-28 (2525) must be addressed in Part II of this plan)

126-28-2. Guidelines

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

126-28-5. Attendance

126-28-8. Personnel Standards

126-28-9. Regulation of Facilities

126-28-10. Standards for Preparing Students

126-28-11. Curriculum and Assessment

County Superintendent of Schools _____

Printed Name _____ Date Submitted _____

WEST VIRGINIA STATE TRAINING & REGISTRY SYSTEM (STARS)
CAREER PATHWAY LEVEL DESCRIPTIONS

01/02

These competency levels and appropriate developmental practices describe expected attributes, skills and abilities of all people who work with young children (ages birth through eight years) and their families. Training and understanding of core competencies is the same for all who work in an early childhood setting. The level of competence, skills, abilities and understanding increases as staff/providers become more experienced and assume more responsibility, especially in the areas of programming, advocacy, training and supervision. A supervisor is to have a higher level of education and/or more years of experience than the person being supervised.

Eight levels of competency reflect experience and/or formal educational accomplishments. Individuals at all levels must have no criminal record and be in good health. An early care and education field refers to a credential, college credits or degree in child development, Birth through 4 certification, early childhood, child and family studies, and early childhood special education. Relevant occupational experience refers to working with or on behalf of children, ages birth through 8, and their families through: a) direct work with young children and families; b) supervision, leadership or management; c) program coordination, development or regulation; d) training, instruction or technical assistance; and e) evaluation or research. This Career Pathway does not replace licensing or certification requirements that may be expected for specific positions (i.e. certified public school teacher, WV Birth to Three credentialing requirements, etc.).

The abilities in each level are cumulative. Individuals must demonstrate proficiency in the core competency abilities listed in each previous level as well as in their level of professional development.

Level I:

Individuals at this level must be at least 16 years of age and be enrolled in high school or GED preparation classes. They conform to Core Competencies by following the directions and instructions of their supervisors.

Level II:

Individuals at this level must be at least 18 years of age, have a high school diploma or its equivalent and have an interest in working with young children. Staff/providers at this level have 0-1 year of experience working with young children and will assist other staff/providers. They *understand and practice* Core Competencies with direction and instruction from their supervisors or through sponsorship/affiliation with a professional association or qualified mentor.

Level III:

Staff/providers must have:

1. The West Virginia Training Certificate in Early Care and Education (WVTCECE), which is awarded for completion of 120 hours of STARS training. Training for WVTCECE is provided by STARS trainers at registered workshops and training programs throughout the state. Recognition certificates are issued for each 30 hours of STARS training completed. Training hours obtained through the WV Infant/Toddler Training (One Step At A Time) and the WV Educare Orientation program will count towards the WVTCECE.
2. Completed at least 120 training hours required for the Child Development Associate (CDA) certificate, as certified by CDA instructors,

or

3. Completed 3 semesters of the registered Apprenticeship for Child Development Specialists (ACDS) program,
or
 4. Completed the WV Department of Education Early Childhood & Education Services area of study through participating vocational and high schools, as certified by the participating school and the Department of Education.
or
- Staff/providers at this level *practice programming* which conforms to the Core Competencies.

Level IV:

Staff/providers must have:

1. A Child Development Associate (CDA) certificate,
or
2. 12 college credits in early care and education course work and a minimum of 300 clock hours of relevant occupational experience,*
or
3. Four completed semesters of the registered Apprenticeship for Child Development Specialist (ACDS) program. A certificate of completion of 4 semesters of ACDS training is required from the ACDS instructor.
or
4. Ten (10) years of relevant occupational experience* (this experience exemption expires on January 1, 2003).

Staff/providers at this level *practice and implement programming* which conforms to Core Competencies.

Level V:

Staff/providers must have:

1. A registered Apprenticeship for Child Development Specialist (ACDS) certificate from the Department of Labor or Department of Education,
or
2. Other comparable certificate program in child development,
or
3. 28-63 semester hours of college credit, with a minimum of 9 credit hours of early care and education course work,
or
4. 28-63 semester hours of college credit and 1 year of relevant occupational experience (minimum of 1200 clock hours per year),*
or
5. Fifteen (15) years of relevant occupational experience* (this experience exemption expires on January 1, 2003).

Staff/providers at this level *plan and adapt programming* which conforms to the Core Competencies.

Level VI:

Staff/providers must have:

1. An Associate Degree in an early care and education field,*
or
2. An Associate degree with a minimum of 12 credit hours of early care and education course work,
or
3. An Associate degree and two years of relevant occupational experience,*
or
4. Completed at least 64 college credits and have two years of relevant occupational experience,*
or
5. Completed at least 64 college credits with a minimum of 12 credit hours of early care and education course work.

Staff/providers at this level *make curricular decisions* which conform to Core Competencies.

Level VII - Bachelor's Degree:

Staff/providers must have:

1. A Bachelor's Degree in an early care and education field,
or
2. A Bachelor's degree with a minimum of 15 hours of early care and education course work which includes either at least 90 contact hours of practicum experience with young children or one year of relevant occupational experience,
or
3. A Bachelor's degree and three years of relevant occupational experience.*

Staff/provides at this level *develop, select, and evaluate the early care and education program* to ensure it conforms to core competencies. In addition, they *apply theory into practice and help others understand this application of theory*.

Level VIII - Advanced Degree:

Staff/providers must have:

1. A Master's Degree or other advanced degree in an early care and education field,*
or
2. An advanced degree with a minimum of 18 hours of early care and education course work which includes either at least 90 contact hours of practicum experience with young children or one year of relevant occupational experience,

3. An Advanced degree and five years of relevant occupational experience.*
or

Staff/providers at this level *are directly involved in the activities of state, regional and/or national groups who advocate for children and contribute to the formation, evaluation and implementation of policies within the field of early childhood.*

* An early care and education field refers to a credential, college credits or degree in child development, Birth through 4 certification, early childhood, child and family studies, and early childhood special education.

* Experience exemption: Staff/providers with 10 or 15 years of prior, relevant occupational experience may bypass formal credentialing and educational requirements and advance to Level III or Level IV, respectively. This exemption clause will expire on January 1, 2005.

* Relevant occupational experience refers to a minimum of 1200 clock hours per year working with or on behalf of children, ages birth through 8, and their families through: a) direct work with young children and families; b) supervision, leadership or management; c) program coordination, development or regulation; d) training, instruction or technical assistance; e) evaluation or research.

WEST VIRGINIA STARS

State Training and Registry System

professional development for early care and education

LEVEL VIII

Requirements: Advanced degree in an early care and education field* **OR** Advanced degree with 18 credit hours in early care and education & either 90 practicum contact hours or 1 year of relevant occupational experience **OR** Advanced degree & 5 years of relevant occupational experience.

Abilities: Directly involved in the activities of state, regional and/or national groups; contribute to the formation, evaluation & implementation of policies within the field.

LEVEL VII

Requirements: Bachelor's degree in an early care and education field* **OR** Bachelor's degree with 15 credit hours in early care and education & either 90 practicum contact hours or 1 year of relevant occupational experience **OR** Bachelor's degree & 3 years of relevant occupational experience. **Abilities:** Develop, select and evaluate the child care program; apply theory into practice.

LEVEL VI

Requirements: Associate degree in an early care and education field* **OR** Associate degree with 12 hours in early care and education courses **OR** Associate degree & 2 years of relevant occupational experience **OR** ≥ 64 college credits & 2 years of relevant occupational experience **OR** ≥ 64 college credits in a related field with 12 hours in early care and education courses. **Abilities:** Make curricular decisions which conforms to Core Competencies.

LEVEL V

Requirements: Registered Apprenticeship for Child Development Specialist (ACDS) certificate **OR** other comparable certificate program in early care & education **OR** 28-63 college credits, with 9 credit hours in early care & education **OR** 28-63 college credits & 1 year of relevant occupational experience **OR** fifteen (15) years of relevant occupational experience.* **Abilities:** Plan and adapt programming which conforms to Core Competencies.

LEVEL IV

Requirements: Child Development Associate (CDA) certificate **OR** 12 college credits in early care and education & 300 clock hours of relevant occupational experience* **OR** 4 completed semesters of the ACDS program **OR** ten (10) years of relevant occupational experience.*

Abilities: Practice and implement programming which conforms to Core Competencies.

Level III

Requirements: West Virginia Training Certificate in Early Care and Education (WVTCECE) which includes completion of 120 clock hours of approved training through WV STARS **OR** ≥ 120 completed training hours required for the Child Development Associate (CDA) **OR** 3 completed semesters of the Registered Apprenticeship for Child Development Specialist (ACDS) program **OR** completed the WV DOE Early Childhood & Educational Services area of study through participating vocational schools.

Abilities: Practice programming which conforms to Core Competencies.

LEVEL II

Requirements: At least 18 years old with a high school diploma or equivalent and 0-1 years of experience.

Abilities: Understand and practice Core Competencies with direction and instruction or through sponsorship/affiliation with a professional organization or qualified mentor.

LEVEL I

Requirements: At least 16 years old & enrolled in High School or GED preparation classes.

Abilities: Conform to Core Competencies by following supervisory direction and instruction.

★ The experience exemption clause to advance to Level IV or V with 10 or 15 years of experience expires on January 1, 2005.

★ An early care and education field refers to a credential, college credits or degree in child development, Birth through 4 certification, early childhood, child and family studies, and early childhood special education. This Career Pathway does not replace licensing or certification requirements that may be expected for specific positions (i.e. certified public school teacher, WV Birth to Three credentialing requirements).

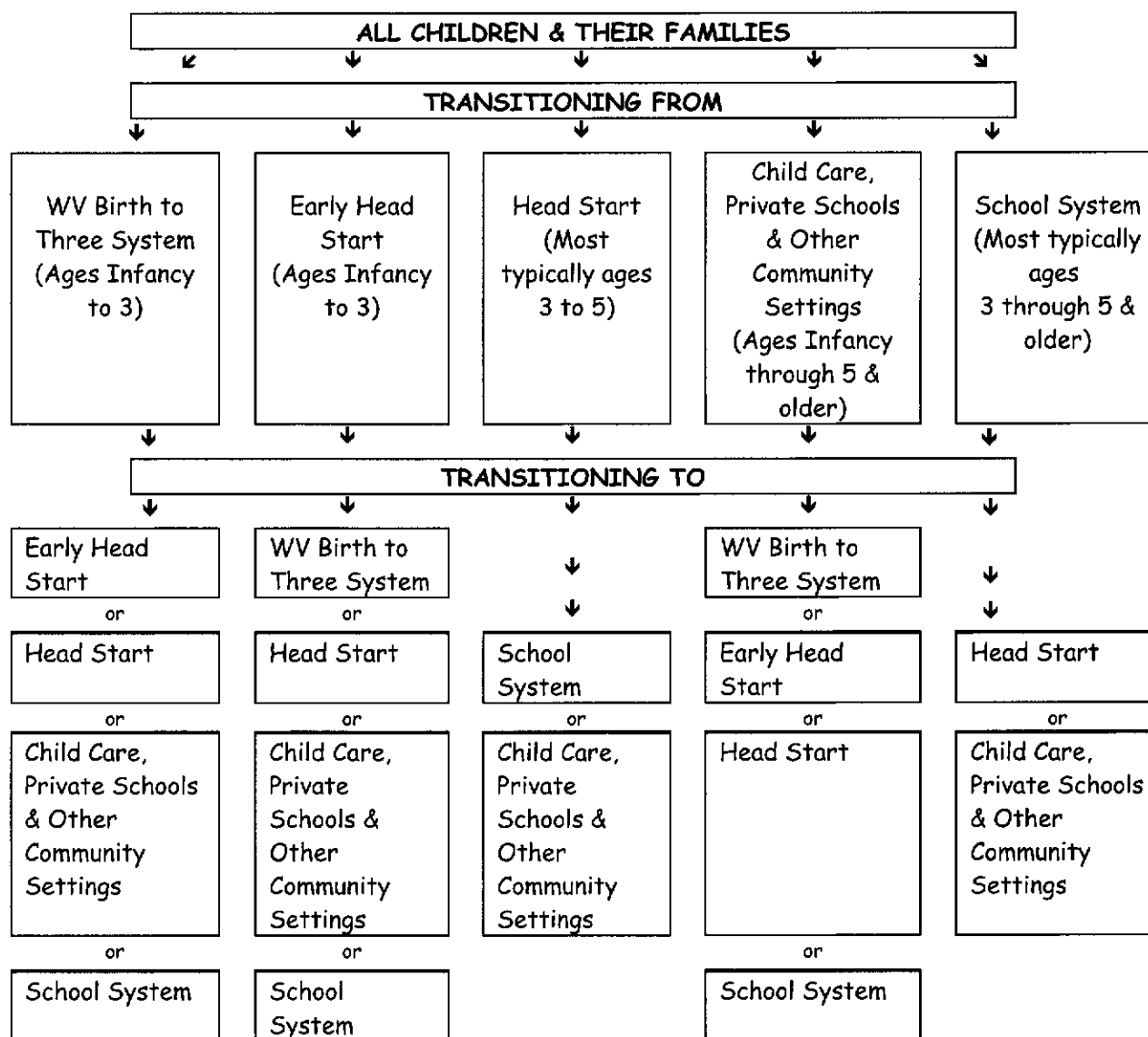
★ Relevant occupational experience refers to working with or on behalf of children, ages birth through 8, and their families through: a) direct work with young children and families; b) supervision, leadership or management; c) program coordination, development or regulation; d) training, instruction or technical assistance; e) evaluation or research.

06/02

WV EARLY CHILDHOOD TRANSITION CHECKLIST

The purpose of this checklist is to assist local agencies in supporting children and families as they transition to and from a variety of settings: WV Birth To Three System, School System, Head Start and Child Care. It identifies key activities for such transitions, some legally required and some reflecting effective practice (offered here as guidance). The user of this checklist is encouraged to consult specific federal, state, and local legal requirements to ensure that procedures are in full compliance. Four (4) different checklists are provided here for transitions to or from: (1) WV Birth to Three System; (2) Early Head Start and/or Head Start; (3) Child Care, Private Schools and Other Community Settings; and (4) School System (Preschool, Kindergarten, or Other Grades). To use the checklist:

1. Select one (1) checklist per child, choosing the checklist(s) appropriate for the child's situation. Enter child/program information at the top of the page.
2. Keep the checklist in the child's record as a tool to track each activity to make sure it is completed. When complete, put a check in the "completed" column and date(s) of activities in the "timelines" column. Add notes as needed.



**WV EARLY CHILDHOOD TRANSITION CHECKLIST
TRANSITIONING FROM THE WV BIRTH TO THREE SYSTEM**

CHILD _____ PARENT _____

DOB _____ AGENCY _____ CONTACT PERSON _____

<i>These activities are appropriate for ALL children transitioning TO or FROM ANY setting.</i>		
Completed	Activity	Timelines
	Provide parents with information on programs and/or services including enrollment requirements and registration.	
	Communicate with agency staff to facilitate continuity of programming and/or services.	
	Provide transition related training to prepare staff a) to follow appropriate procedures and b) to support children and families in the transition process.	
	Provide training for parents regarding transition process and future options. Include interagency partners in the training.	
	Involve parents in transition planning: a) to advocate for children b) communicate with personnel in the next service setting	
	Plan activities to prepare child for the next service setting.	
	Arrange visits to the next service setting for children, families, and staff from the sending program or service.	
	Coordinate with other agencies to transfer relevant records to next service setting.	
	Release demographic information/screening evaluation to the next service setting with parental permission as necessary.	

<i>For Children and Families Transitioning From WV Birth to Three System</i>		
Completed	Activity	Timelines
	Conduct transition planning with parent. Add plan to Individual Family Service Plan (IFSP).	At least 10 months prior to 3 rd birthdate.
	Service coordinator contacts all appropriate "potential" receiving agencies that family wants invited to a face-to-face transition-planning meeting, including one or more of the following: ___ school system ___ Early Head Start/Head Start ___ child care, private schools and other community settings ___ other agencies for support needed by family Provide packet of information on the child to potential receiving agencies with parental consent.	

<i>For Children and Families Transitioning From WV Birth to Three System - continued</i>		
Completed	Activity	Timelines
	Provide training for parents regarding transition process and future service options. Involve interagency partners in this training such as one or more of the following: ___ school system (required if child suspected to have a disability) ___ Early Head Start/Head Start ___ child care and other community settings and/or ___ family support or other behavioral health services ___ child care, private schools and other community settings	Start at least 10 months before 3 rd birthdate and continue through transition process
	Release demographic information to the school system or other identified receiving agencies with parent permission. Include releases needed for next service setting as appropriate.	4 months prior to 3 rd birthdate or earlier for summer or fall DOB.
	Conduct 90 day face-to-face meeting with all appropriate receiving programs (Early Head Start/Head Start, School System, Family Support, Child Care, Private Schools, Other Community Settings etc.) to discuss: 1. Child's program options from 3 rd birthdate through remainder of school year 2. Updating of transition plan by interagency partners with family to address: a. activities which will prepare the child and family for the transition and b. strategies for sharing information among sending and receiving agencies	At least 90 days and up to 6 months prior to 3 rd birthdate - or earlier to ensure that an Individualized Education Program (IEP) can be in place by the child's 3 rd birthdate. These timelines for schools may be different for Head Start.
	Participate in or release information concerning screening / assessment / evaluation, reports etc. to receiving agencies as required or authorized by parent.	According to local interagency agreement timelines and early enough to allow IEP to be in place by 3 rd birthdate
	Participate with team to determine need for further assessment.	
	Participate in IFSP/IEP meeting.	

NOTES:

**WV EARLY CHILDHOOD TRANSITION CHECKLIST
TRANSITIONING FROM EARLY HEAD START/ HEAD START**

CHILD _____ PARENT _____

DOB _____ AGENCY _____ CONTACT PERSON _____

<i>These activities are appropriate for ALL children transitioning TO or FROM ANY setting.</i>		
Completed	Activity	Timelines
	Provide parents with information on programs and/or services including enrollment requirements and registration.	
	Communicate with agency staff to facilitate continuity of programming and/or services.	
	Provide transition related training to prepare staff a) to follow appropriate procedures and b) to support children and families in the transition process.	
	Provide training for parents regarding transition process and future options. Include interagency partners in the training.	
	Involve parents in transition planning: a) to advocate for children b) communicate with personnel in the next service setting	
	Plan activities to prepare child for the next service setting.	
	Arrange visits to the next service setting for children, families, and staff from the sending program or service.	
	Coordinate with other agencies to transfer relevant records to next service setting.	
	Release demographic information/screening evaluation to the next service setting with parental permission as necessary.	

<i>For Children and Families Transitioning From Early Head Start (Ages Infancy to 3) or Head Start (Most typically ages 3 to 5)</i>		
Completed	Activity	Timelines
	Initiate meetings to discuss developmental progress of individual children among parents and professionals.	Early Head Start - at least 6 months prior to 3 rd birthdate
	Obtain the from parent consent/authorization for release of information for a referral.	Mail within 10 days of parent's signature
	Release relevant assessment, health records, etc.	
	Participate in Individual Family Service Plan (IFSP)/Individualized Education Program (IEP) meeting.	

NOTES:

**WV EARLY CHILDHOOD TRANSITION CHECKLIST
TRANSITIONING TO OR FROM CHILD CARE,
PRIVATE SCHOOLS OR OTHER COMMUNITY SETTINGS**

CHILD _____ PARENT _____

DOB _____ AGENCY _____ CONTACT PERSON _____

<i>These activities are appropriate for ALL children transitioning TO or FROM ANY setting.</i>		
Completed	Activity	Timelines
	Provide parents with information on programs and/or services including enrollment requirements and registration.	
	Communicate with agency staff to facilitate continuity of programming and/or services.	
	Provide transition related training to prepare staff a) to follow appropriate procedures and b) to support children and families in the transition process.	
	Provide training for parents regarding transition process and future options. Include interagency partners in the training.	
	Involve parents in transition planning: a) to advocate for children b) communicate with personnel in the next service setting	
	Plan activities to prepare child for the next service setting.	
	Arrange visits to the next service setting for children, families, and staff from the sending program or service.	
	Coordinate with other agencies to transfer relevant records to next service setting.	
	Release demographic information/screening evaluation to the next service setting with parental permission as necessary.	

NOTES:

**WV EARLY CHILDHOOD TRANSITION CHECKLIST
TRANSITIONING TO THE SCHOOL SYSTEM
(PRESCHOOL, KINDERGARTEN, OR OTHER PROGRAMS
FOR CHILDREN WITH AND WITHOUT DISABILITIES)**

CHILD _____ PARENT _____

DOB _____ AGENCY _____ CONTACT PERSON _____

These activities are appropriate for ALL children transitioning TO or FROM ANY setting including school settings for students with and without disabilities.

Completed	Activity	Timelines
	Provide parents with information on programs and/or services including enrollment requirements and registration.	
	Communicate with agency staff to facilitate continuity of programming and/or services.	
	Provide transition related training to prepare staff a) to follow appropriate procedures and b) to support children and families in the transition process.	
	Provide training for parents regarding transition process and future options. Include interagency partners in the training.	
	Involve parents in transition planning: a) to advocate for children b) communicate with personnel in the next service setting	
	Plan activities to prepare child for the next service setting.	
	Arrange visits to the next service setting for children, families, and staff from the sending program or service.	
	Coordinate with other agencies to transfer relevant records to next service setting.	
	Release demographic information/screening evaluation to the next service setting with parental permission as necessary.	

For Children & Families Being Referred for Transition to Special Education Services in the School System: children ages 3 through 5 & older having or suspected of having a disability

Completed	Activity	Timelines
	Receive referral demographic information from family or agency from which child is transitioning.	10 months prior to 3 rd birthdate (if transitioning from WV Birth to Three)
	Participate in meeting with parents and referring agency (example: 90 day face-to-face for WV Birth to Three or meeting with Head Start, Child Care, Private School or Other Community Agency)	

***For Children & Families Being Referred for Transition to Special Education Services in the School System: children ages 3 through 5 & older having or suspected of having a disability
- continued***

Completed	Activity	Timelines
	Review current evaluation data and determine evaluation data needed. (Example: from WV Birth to Three or Head Start)	
	Obtain parental permission for needed evaluation and ensure due process rights and parental input. (Example: parent questionnaire)	From receipt of parental permission to eligibility meeting is 80 calendar days
	Conduct evaluation / assessment including involvement of other agencies' staff as necessary.	Within overall timelines as noted above.
	Schedule Eligibility Meeting and/or a meeting for both eligibility determination and Individualized Education Program (IEP) development.	Within overall timelines as noted above.
	Participate in Eligibility Meeting or Eligibility/IEP meeting.	Within overall timelines as noted above.
	Schedule IEP team meeting (if not done as part of Eligibility Meeting).	30 calendar days following Eligibility Meeting
	Conduct IEP team meeting with participants. <i>NOTE: Follow guidelines assuring parental participation as outlined in 2419. (State Department of Education Regulations for the Education of Exceptional Students)</i>	
	Determine placement settings based on options as outlined in 2419.	

NOTES:

County Collaborative Annual Report for

Approved participating WV Pre-k classrooms

Program Year _____

County Submitting _____

- ☐ **Annual Early Childhood Environmental Rating Scale self-assessment.**
- ☐ **A summary of the WV Pre-k classroom services provided in the county.**
- ☐ **Collaborative agreements for each approved participating WV Pre-k provider.**
- ☐ **Total number of children served in WV Pre-k classrooms.**
- ☐ **Number of children served in WV Pre-k classrooms with identified special needs.**
- ☐ **A list and brief description of professional development opportunities provided for WV Pre-k classroom staff.**
- ☐ **Number of WV Pre-k classroom staff that participated in professional development opportunities.**
- ☐ **Number of children who transitioned from WV Pre-k classrooms into kindergarten.**

FISCAL NOTE WORKSHEET

(Submit 4 Copies)

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

SUBJECT Policy 2525 West Virginia's Universal Access to Pre-kindergarten 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 to the state through the school aid funding formula of fully implementing the West Virginia Pre-K System by 2012-2013, under West Virginia Code §18-5-44, is estimated to be \$48,823,301 over the next ten years. A large portion of this funding will be existing formula money. New state aid formula funding dollars will primarily be needed only in the counties with increasing enrollments. As per the mandate of that code, resources from federal Head Start funds, Temporary Assistance to Needy Families (TANF)/Child Care Development Fund (CCDF), and start up funds through Title I of ESEA (now No Child Left Behind) will be fully utilized and are estimated to currently equal approximately \$41,000,000. The additional cost for Department staff is estimated to be \$250,000 for full implementation.

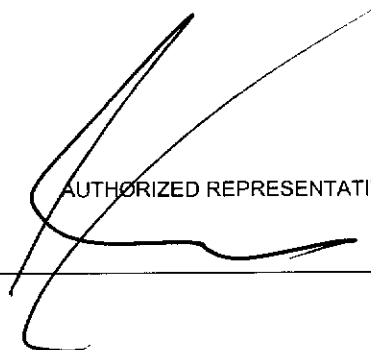
DATE

AGENCY

AUTHORIZED REPRESENTATIVE

10/03/02

West Virginia Department of Education



POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System (WV Pre-k)

COMMENT LOG

Comment Period Ends November 22, 2002

Date	Individual/Organization	Comments	Action/ Type	Action Type N: No Response NA: Not Accepted A: Accepted - Negative + Positive o Neutral
11-21	Candis D. Clark Elementary Coordinator Wetzel County Schools 333 Foundry Street New Martinsville, WV 26155	Comments/Suggestions 126-28-1. General. Three year olds are only identified in the General Section & Guidelines. 126-28-2. Guidelines. 2.1.1 and 2.1.5 seem to conflict. Is it four year olds or 3 year olds? 2.1.7 This should read "employ highly qualified staff as defined by NCLB" 126-28-3. Definitions. 3.7 Should read "s minimum of ten and half hours per week during consecutive days during the school year." This will allow counties the flexibility of "scheduling" while meeting the intent of the law. 126-28-6. Collaboration an the County Plan. 6.1 Delay in the passage of this policy, October-December, 2004, would allow collaborations to have more time for planning for a quality program. 6.3 County plans should be submitted for "full implementation" or until 2013. *6.4 A mandated percentage of contracted services will ensure "failure" and negates the "spirit" of collaboration on which successful programs are based. should end there.	A- clarified in 2.1.2 N/A A- changed to hours in revised policy 3.8 NA - in code §18-5-44 N NA - allowance in policy for varying percentage 6.4	o o - - o -

Date	Individual/Organization	Comments	Action/ Type	
		126-28-8. Personnel Standards. 8.1 Requiring certified staff is commendable. 126-28-9. Regulation of Facilities. 9.1 WV Dept. of Education has its own facility requirements. Programs housed in school facilities should only have to meet those requirements. Programs housed outside of schools should be regulated under the DHHR Child Care licensing staff. 126-28-11. Curriculum and Assessment. 11.6 Should be eliminated. This does not belong in policy. Identified developmentally appropriate practices will be used by certified teachers. 126-28-12. Transition and Continuity. 12.1 Attention to transition is critical. This statement should read: "Each program participating in the county plan must have a written and implemented plan for transitioning children into kindergarten." The statement there. 126-28-14. Staff Development and Training. 14.1 The staff development requirement of 18 hours annually is reasonable, however, effective staff development is more personalized and based on needs. Please do not mandate the topics of annual staff development! 14.2 Please change this to read: ".....professional development opportunities MAY follow the WV STARS process. There may be more effective ways to achieve desired results. 14.3 This policy is not written for certified public school teachers. Please consider allowing the public schools sited to follow the existing rules for maintaining the teaching license. 126-28-16. Program Oversight. Needs to be clearer as to whose responsibility it will be for oversight. Two sets of rules!	N NA NA - not necessarily true N A- changed to align with WVDE policy NA A- changed in revision to apply only to comm. settings NA - in code	+ - - + - - - -

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11-22-02	Barbara Stout, Director Adolesc. Ed. Wetzel County Schools 333 Foundry Street New Martinsville, WV 26155	Comments/Suggestions 126-28-1. General. Three year olds are only identified in the General Section & Guidelines. 126-28-2. Guidelines. 2.1.1 and 2.1.5 seem to conflict. Is it four year olds or 3 year olds? 2.1.7 This should read "employ highly qualified staff as defined by NCLB" 126-28-3. Definitions. 3.7 Should read "s minimum of ten and half hours per week during consecutive days during the school year." This will allow counties the flexibility of "scheduling" while meeting the intent of the law. 126-28-6. Collaboration an the County Plan. 6.1 Delay in the passage of this policy, October-December, 2004, would allow collaborations to have more time for planning for a quality program. 6.3 County plans should be submitted for "full implementation" or until 2013. *6.4 A mandated percentage of contracted services will ensure "failure" and negates the "spirit" of collaboration on which successful programs are based. should end there.	see Candis Clark	

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11-22-02	Dr. Paul E. Barcus, Jr. Superintendent Wetzel County Schools 333 Foundry Street New Martinsville, WV 26155	Comments/Suggestions 126-28-1. General. Three year olds are only identified in the General Section & Guidelines. 126-28-2. Guidelines. 2.1.1 and 2.1.5 seem to conflict. Is it four year olds or 3 year olds? 2.1.7 This should read "employ highly qualified staff as defined by NCLB" 126-28-3. Definitions. 3.7 Should read "s minimum of ten and half hours per week during consecutive days during the school year." This will allow counties the flexibility of "scheduling" while meeting the intent of the law. 126-28-6. Collaboration an the County Plan. 6.1 Delay in the passage of this policy, October-December, 2004, would allow collaborations to have more time for planning for a quality program. 6.3 County plans should be submitted for "full implementation" or until 2013. *6.4 A mandated percentage of contracted services will ensure "failure" and negates the "spirit" of collaboration on which successful programs are based. should end there.	See Candis Clark	

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11-22-02	Joyce Phipps, Head Start Director Raleigh County Community Action P.O. Box 3066 EBS Beckley, WV 25801	Comments/Suggestions 126-28-1 General 126-28-3.2 I support the requirement (search based) that classes must operate for a minimum of 3 1/2 to a max. of 6 hours per day with 4 hours being optional, and that classes operate a min. of 4 days per week. 126-28-4. Parent/Guardian Involvement and Family Support. This section needs strengthened to include: requiring county plans to address how they will work with families in the areas of Literacy, Parenting, Employment, Wellness in order to strengthen parents skills as children transition into kindergarten. *126-28-6.1 Collaboration and the County Plan. Recruitment/enrollment as a collaboration effort to assure minimal duplication of paperwork for families need to be addressed in the County Plan. A common/compatible intake form to enroll children in various options in each county is essential. 126-28-8. Personnel Standards. I strongly support Section 8.2 and 8.3 for qualifications and the full-time permit provisions to assure qualifying certification/endorsement of personnel. 126-28-9. Regulations of Facilities. Strongly support requiring programs serving four-year-old children in pre K be required to meet the WVDHHR Child Care licensing regulations, and also support OEPA of the state DOE in enforcements of corrective action plans identified through DHHR monitoring process. *6.4 In order to maximize existing funds, I support that a minimum of 50% of the four-year-old classrooms be contracted to community programs meeting the standards to provide the classroom space, qualified staff and financial resources to meet the goal. 126-28-13. Inclusive Environments. Is Essential.	N A N N N N N	+ O O + + + +

Date	Individual/Organization	Comments	Action/ Type	
		126-28-15. Transportation. <u>Is essential</u> to universal access of pre-K services. It is strongly recommended that transportation be a required service in order to assure that transportation is available in rural areas and areas with extensive low-income population. 126-28-19. Program Evaluation. Constructive/objective monitoring is a necessary , component of all county plans. The Head Start Program. Performance Standards should be utilized in development of the monitoring process . With strong direction re: essential parts, possibly a format similar to the county plan.	NA NA - only covers on of the potential providers	-

Date	Individual/Organization	Comments	Action/ Type	
11-20-02	Nikki's Child Development Center (Keith Seal) Teachers Assistant 4's & 5's 28 Ridersville Road Berkeley Springs, WV 25411	Comments/Suggestion 126-28-1 General. I feel that these guidelines are set forth to be serve that the children who are involved in this program receive the highest level of learning possible & totally agree w/ these guidelines. 126-28-3. Definitions. I feel these definitions support & layout all aspects of the WV pre-K program. I am unsure whether or not I agree w/the limits set on the min. amount of days a child must attend. 126-28-4. Parent/Guardian Involvement and Family Support. Parent/Guardian involvement is very important. That is number one priority I believe support must also come from other numbers of the family as well however parental support is most important to me. 126-28-5. Attendance. Enrollment is a good thing. However I Feel that if parents are respectively bringing there child late or he/she is absent reg. to give that spot to someone more deserving. 126-28-6. Collaboration and the County Plan. I feel that all offices need to be a sometype of agreement or this will never work. I also agree w/ the fact that 50% of centers in participation must be w/ in the community. Once again stressing community involvement. 126-28-7. Waivers. My feelings regarding are very unsure. I really don't understand or get the who gist of this. 126-28-8. Personnel Standards. Teacher eligibility is most important also! All teachers must have the mental capability no just a degree. There are plenty of teachers in preschool who have no degree but are more than capable of giving our future what they need & deserve. 126-28-9. Regulation of Facilities. I feel that if a facility is participating they must meet the same health requirements as any other public/private school. 126-28-10. Standards for Preparing Students. Preparation is important however I feel there is too much stree stree	N N N N N N N N N	+ + + + + 0 + +

Date	Individual/Organization	Comments	Action/ Type	
		126-28-18. Health and Safety. Totally agree!	N	0
11-21-02	Suzann Murphy, Principal Pruntytown Elementary School Rt 2 , Box 157 Grafton, WV 26354	Comments/Suggestions 126-28-1. General. Clear 126-28-2. Guidelines. Clear & appropriate 126-28-3. Definition. There is a problem with 3.6 eligible child. A child who turns 5 in the months of July, & August especially so be given the opportunity to go to pre-K or kindergarten. So children are not mature at age 5 for kindergarten and are being punished because they cannot get into preschool where they need to be at their level. Remember- Developmentally appropriate. 126-28-4. Parent/Guardian Involvement and Family Support. Clear & Ok. 126-28-5. Attendance. 5.1 Good option. 126-28-6. Collaboration and the County Plan. There is big difference between Head Start teachers & teachers who are certified in educate Research has shown Head Start is not that effective. A print rich environment is all that is heard in all research material on student learning. Head Start needs to change and read the research.	N N A N N N	+ + + + + 0

Date	Individual/Organization	Comments	Action/ Type	
11-22-02	Patricia A. Alker, Preschool Teacher Nutter Fort Elementary Buckhannon Pike Clarksburg, WV 26301	Comments/Suggestions 126-28-1. General Agree 126-28-2. Guidelines. I strongly disagree that the teachers & aides in this program need more training & education that other classroom professionals. 126-28-3. Definitions. I don not agree with the statement that a four year old does not have to be potty-trained to be in the Preschool program, unless there is medical reason, these children should be potty-trained by that age of 4. A lot of times is taking away from the other children if you have this situation in your classroom. It is not the teacher's or aides job to potty-train a child. It's the PARENTS. I do not agree with a 3 day week plan. I taught a 3 day weekplan for a year & the children loose what they learned during that period from week to week. Even 4 year olds need the consistently of a 5 day week even if its for half a day which 126-28-4. Parent/Guardian Involvement and Family Support. I totally agree that parents/guardian should be involved. I do not think 3 home visits are necessary at this level, I certainly hope that the regular teachers are not going to be made to do all the enormous extra paper work that the Head Start employees are required. It is not necessary & the recordings we keep on each child are certainly ample of this age level. 126-28-6. Collaboration and the County Plan. I think the 3 year old program should be self -contained. I also believe that the cut off date should be extended to at least Jan. 1st. There is a <u>big</u> difference in a child that has just turned 4 in May-Aug & those that are turning five as the school year progresses.	NA NA NA NA - only minimum are in the policy N NA - not consistent with §18-5-44	- - - + -

Date	Individual/Organization	Comments	Action/ Type	
11-21-02	Asheigh Hutman Nikki's Child Development Center 28 Ridersville Road Berkeley Springs, WV 25411	Comments/Suggestions 126-28-1. General. I agree with the guidelines. I would like to see these guidelines used in (2525), in the future. They are good ideas. 126-28-3. Definitions. 3.1- I see no problem in funding, I don't want the state to take funding away from childcare. 126-28-4. Parent/Guardian Involvement and Family Support. I agree with Parent/Guardian Involvement. All teachers and parents should have a relationship, that helps the child's experience. 126-28-5. Attendance. I see no problem with the Attendance, I don't agree with it says its mandatory if the child is 4 years old. If they are ready to go, it helps the child in many ways some children are on a lower level, it may be difficult, could effect his future. 126-28-6. Collaboration and the County Plan. I agree with this also, every county needs to have existing childhood collaboration. 126-28-7. Waivers. I agree to these waivers. 7.13 I think if theres not even half of what's expected, those children deserve the chance to learn. 126-28-8. Personnel Standards. Staff at Daycare who are already qualified with experience to 5yrs, theres no need to add 126-28-9. Regulations of Facilities. I agree with these standards, every facility need to follow these. 126-28-10. Standards for Preparing Students. I agree every child needs to be ready & willing to apply himself for a big transition like this. 126-28-11. Curriculum and Assessment. Curriculum and Assessment is very important, I agree with the self evaluation. 11.43	N N N NA - policy based on §18-5-44 N N N N N N N	+ o + - + + + + - -

Date	Individual/Organization	Comments	Action/ Type	
		126-28-12. Transition and Continuity. 11.43. E Children must learn about other cultures. It's a new & different experience for them. 126-28-13. Inclusive Environments. 12.1.7 Parents should have a choice in what programs and when to put them in programs. 126-28-14. Staff Development and Training. I think these are good ideas. 126-28-15. Transportation. 15.1 I agree with transportation. 126-28-16. Program Oversight. Theses are good ideas 126-28-17. Financing. 17.2 I think it's good to know how much out state and county to the cost of this. 126-28-18. Health and Safety. I agree with are health & safety regulations.	N N N N N N N	+ + + + + + +

Date	Individual/Organization	Comments	Action/ Type	
11-22-02	William N. Ashcraft, Assistant Superintendent Harrison County Board of Education 408 E. B. Saunders Way P O Box 1370 Clarksburg, WV 26302	Comments/Suggestions. 126-28-1. General. Applaud the intent to make consistent preschool opportunities available. 126-28-2. Guidelines. Approve the intent to provide developmentally appropriate environments to all children. 126-28-3. Definitions. 3.7 Minimum program availability The length of a day for both WVDE & WVDHHR should be identical. If not, then a 3 ½ hour day is too long for personnel purposes. Teachers may not exceed an 8 hour day. The seven hours of instruction does not allow for lunch, planning and travel time. 126-28-4. Parent/Guardian Involvement and Family Support. 4.1.2 Documented methods of communicating with parent/guardian "which may include" We cannot be required to email parents who are not online. 126-28-5. Attendance. 5.1 The final determination for the child's attendance shall be made by the principal for preschool students, just as it is for kindergarten students. 126-28-6. Collaboration and the County Plan. 6.4. Collaboration and the County Plan The requirement for 50% of the classrooms to be in community settings places an undue burden on school our system is currently operating 30% of its centers in collaboration with other reliable agencies. Some of these are located within the public schools. Why could these not count toward collaborative efforts in community settings? I would seem the intent is not to encourage collaboration , but to be sure that preschool classrooms are not placed in the public school setting. Both the 50% requirement and the definition of community settings should be changed. It also	N N A-addressed in revision 3.8 A- addressed in revision 4.1.2 NA- conflicts with §18-5-44 A-addressed in revised 6.4	+ + - - - -

Date	Individual/Organization	Comments	Action/ Type	
		behoves us to consider those groups who may choose (some for religious reasons) not to be part of the plan. These could account for a significant portion of the population of a county, making it even more difficult to achieve the 50%. 9.1 Regulation of Facilities We have attempted to place one of our collaborations into a childcare facility that has been licensed for several years to a private childcare entity in our community. Both the licensing coordinator and the fire marshal have refused to license that same facility to us for our collaboration. Thousands of dollars have been spent by our collaboration on the physical plant: furnace, steps, paints, carpentry and electrical work. The site is still deemed unacceptable for licensure, even provisionally. Since our efforts have only improved the site, it is difficult to understand how improving it according to the directions of the licensing coordinator and fire marshal have failed to make it licensed and usable for our collaboration, but acceptable for a private daycare. 10.1 Standards for Preparing Students Does this standard mean that any participating agency must use the adopted curriculum at all times? What would this mean for daycare centers and faith-based groups? How would this be monitored? 16.1 Program Oversight We need a more well-defined mechanism or model for monitoring program implementation at all sites for all agencies involved in the plan. What safeguards are being built into the policy in regard to employees of these facilities who are not board of education employees? 17.2 Financing This is another unfunded mandate. Preschool programs are expensive and excellent preschool programs are incredibly expensive.	NA- local issue N N A- legislative issue	- o o -

Date	Individual/Organization	Comments	Action/ Type	
10-23-02	Anna Peck, Teacher for Infants/Toddlers Nikki's Child Development Center 348 N. Launte Avenue Berkeley Springs, WV 25411	Comments/Suggestions 126-28-1. General. I do not agree with sending a 4yr. old to kindergarten. If the child will be 5 in the school year then they should go to kindergarten. If they are tested & mature enough then they should be able to go. 126-28-2. Guidelines. If a child is not potty trained then they should not be able to go to public school unless they have a disability and the school is equipped for the child. 126-28-3. Definitions. To me Pre-k is anyone under the age of 5. If yr. olds start public school, then before long you will want 3yr olds in kindergarten. Pre-k children should be able to play with others and learn to be social not have to worry about learning to add & subtract etc. or do science or other homework the children have to do today. They are only little once, and we need to give them time to grow up. 126-28-4. Parent /Guardian Involvement and Family Support. There should be more parent involvement. Parent should have to attend at least 1 class with his or her child they need to know that the teachers are not baby sitters & they are these to help their child to learn, not just put them in front of a TV & forgot about them. 126-28-6. Collaboration and the County Plan. If 4yr olds are permitted t have to go to school then they should have to have a teacher that has been to college for early childhood education, regardless if they work in child care or public schools as long as they have some training or a degree.	NA-lack of understanding NA-opinion NA-opinion A-added home visit/face to face conference A-already in policy	- - - - -

Date	Individual/Organization	Comments	Action/ Type	
11-21-02-	Nikki's Child Development Center Head Teacher 4's & 5's 28 Ridersville Road Berkeley Springs, WV 25411	Comments/Suggestions 126-28-1. General. 126-28-2. Guidelines. I agree on hiring staff that have education in early childhood. Also providing the right material for the children. I feel that meeting the needs of the children is great. 126-28-3. Definitions. I agree with 3.5 Developmentally Appropriate items in the classroom also along with curriculum. Also being able to have the funding. 126-28-4. Parent/Guardian Involvement and Family Support. I feel that parent involvement is a great thing. It helps with communication between staff & parents. Also the parent/teacher conferences that way the parents know how their child/ children are doing. 126-28-6. Collaboration and the County Plan Agree with 6.8 126-28-7. Waivers. The conditions all seem fair in order to grant a waiver. 126-28-8. Personnel Standards. I highly agree with 8.1 & 8.22 think those need to stay in there. 126-28-9. Regulation of Facilities. I agree they must meet requirements. 126-28-10. Standards for Preparing Students. I think this will be great for children. The transition will be easier I think because they will already be used to a school setting and a classroom. 126-28-11. Curriculum and Assessment. You need to do things that will keep the children's interest. Also agree on having fine motor & large motor activities. Having the right material out for children to explore.. I agree on the different centers in the classroom. 126-28-12. Transition and Continuity. I agree on 12.1.1 on having them visit the kindergarten classroom. Letting the parents know about things & when they are	N N N N N N N N N N	+ + + + + + + + + +

Date	Individual/Organization	Comments	Action/ Type	
		they are getting the kindergarten teachers involved. 126-28-13. Inclusive Environments. They should be included but yet at the same time, maybe they can have another person come work with them one-on-one. 126-28-14. Staff Development and Training. All staff should have training & Staff Development to learn more about the field helps with continuing education. 126-28-15. Transportation. If transportation is being provided for those who need it. I think they should be on their own bus not put with the high school, or middle school kids. 126-28-16. Program Oversight. I like providing early childhood education programs. 126-28-17. Financing. I think should be the same as other public facilities. 126-28-18. Health and Safety. I highly agree.	N N N N N N	o + + + + +

Date	Individual/Organization	Comments	Action/ Type	
11-20-02	Early Head Start 1433 Dorsey Avenue Morgantown, WV 26501	Comments/Suggestions. 126-28-1. General. This is a very ambitious but vital project for our state. The results will be worth the efforts, I am sure. 126-28-2. Guidelines. I especially like the items 2.12., 2.1.5., 2.1.7., and 2.1.8. 126-28-4. Parent/Guardian Involvement and Family Support. Education is the key to self advancement and the home is vital to that connection. When parents are interested in the school life then the child will also be connected to learning. 126-28-8. Personnel Standards. I have seen teachers make all the difference in a child's learning and life—new buildings and texts are nice but can never replace human enthusiasm. The teachers must have a love of what they do to be effective. 126-28-11. Curriculum and Assessment. I believe young children learn through play; providing developmentally appropriate environments facilitating play is vital. Assessment is an important component as well. Worksheets and workbooks should have no place in preschool classrooms. This is where good teachers appear! If you have quality-based teachers who are prepared and trained, then the children thrive. 126-28-14. Staff Development and Training. This area is very important to be included and responsive to staff needs and concerns.	N N N N N	+ + + + +

Date	Individual/Organization	Comments	Action/ Type	
11-20-02	Nancy Elmore Head Start Unit Suite 864 150 South Independence Mall West Philadelphia, PA 19106-3499	Comments/Suggestions 126-28-1. General. 126-28-4. Parent/Guardian involvement and Family Support. 4.1 - We wholeheartedly concur with the importance of the involvement of parents in the education of their children, as reflected in this section. To further underscore the value of parent involvement in preschool programs, you may wish to add language to this section that encourages pre-kindergarten programs to welcome parent involvement in the classroom. Such language might parallel the Head Start performance standards; which require that classrooms be open to parents during program hours. Parents must be welcomed as visitors and encouraged to observe children in the classroom and to participate with children in group activities. 126-28-6. Collaboration and the County Plan. 6.4 - We applaud the effort to maximize existing resources by requiring that 50% of the pre-kindergarten classrooms be served through contracts with community providers. This provision will encourage valuable partnerships between local school systems, Head Start, and child care - building upon the strengths and unique features each has to contribute. It will also ensure that new programs are not created where there is already a qualified provider in the community, eliminating the potential for duplication of services and competition for slots. For the same reasons, we also support the requirement that a portion of the funds generated by the formula be used through the contractual agreements to support compliance with this policy. 126-28-7. Waivers. 7.2 - We recommend that county request for waivers contain the written concurrence of the core community partners who would normally make up the local planning team. 126-28-8. Personnel Standards. 8.1 & 8.2 - We support the mandate that teachers of preschool children be certified in early childhood education or closely related fields, such as preschool	N N N N	+ + + +

Date	Individual/Organization	Comments	Action/ Type	
		closely related fields, such as preschool special needs. The research clearly demonstrates that it is not effective to teach four year-olds in the same manner as older aged children. Research shows that a "push-down" to pre-kindergarten of methods and materials used in elementary school or middle school is inappropriate for preschool children, and can actually be harmful to them. The challenge for preschool teachers is to develop classroom activities that teach while engaging and developing children's interests. This provision would prohibit the transfer of displaced teachers from higher grades to preschool classrooms without first obtaining the credentials necessary to teach four years olds. We urge you to retain this provision in the final policy. 8.2 - The provision of full time permits for experienced early childhood educators who do not hold one of the three qualifying degrees cited in section 8.1 is critical to the success of this initiative. This is the vehicle that will enable community providers to collaborate successfully with local school systems in making universal pre-kindergarten a reality. This provision underscores the relationship between teacher qualifications and classroom quality, while at the same time providing a window of opportunity that enables experienced, high performing teachers in community programs such as Head Start and child care to proceed along a continuum of professional development toward a qualifying certification. We urge you to retain this provision in the final policy. 8.2 - The provision of full time permits for experienced early childhood educators who do not hold one of the three qualifying degrees cited in section 8.1 is critical to the success of this initiative. This is the vehicle that will enable community providers to collaborate successfully with local school systems in making universal pre-kindergarten a reality. This provision underscores the relationship between teacher qualifications and classroom quality, while at the same time providing a window of opportunity that enables experie	N N	0

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		experienced, high performing teachers in community programs such as Head Start and child care to proceed along a continuum of professional development toward a qualifying certification. We urge you to retain this provision in the final policy. 126-28-9. Regulations of Facilities. 9.1 - We support the requirement that all programs serving preschool children meet West Virginia licensing standards, and encourage you to retain this provision in the final rule. 126-28-11. Curriculum and Assessment. 11.1 through 11.6 - We fully support this "whole child" approach to curriculum and assessment. These research based standards recognize the cognitive, physical, social, emotional and health needs of preschool children. The level of detail provided in this section lays the groundwork for quality pre- kindergarten programs that support school readiness across a broad spectrum of providers, and safeguards against the "push-down" of elementary school methods and materials in teaching pre-k children. We highly recommend the retention of this entire section in the final policy. 126-28-18. Health and Safety. 18.7 - We strongly concur with the limitation on classroom size to twenty children, and with the 1:10 ratio of adults to children. The benefits of these standards reach well beyond the important and obvious health and safety considerations. Research has shown that small classrooms and adequate teacher/child ratios are critical to the quality and success of early childhood education programs. Furthermore, these standards will facilitate Head Start's ability to partner with local school systems, since that standards are consistent with Head Start requirements that set the average class size at seventeen to twenty, with no more than twenty children per classroom. Similarly, the 1:10 teacher/child ratio will also facilitate Head Start's ability to serve as a community program, since Head Start classes must be staffed with two	N N N	+ + +

Date	Individual/Organization	Comments	Action/ Type	
		adults - a teacher and an aid or two teachers and , whenever possible, a volunteer. Any increase in the class size or teacher/child ratios proposed in this policy would pose a barrier to Head Start's participation in the universal pre-kindergarten system.		

Date	Individual/Organization	Comments	Action/ Type	
11-20-02	Raleigh County Preschool Special Needs Teachers 136 Sullivan Road Glen Morgan, WV 25847	Comments/Suggestions 128-28-1. General. 2.1.15 We feel that an inclusive program is an excellent idea. 8.2.1 We strongly feel that teachers certified in Pre School Special Needs should be qualified to instruct preschool children. They have successfully developed curriculum, taught challenging children, as well as their typical peers. Many have been presenters at a state level preschool conferences and adjunct college faculty. The preschool special needs teachers of Raleigh County have participated in many in-service trainings to enrich their professional development. We would strongly recommend that preschool special needs teachers be considered to hold qualifying certification. 14.1 The training requirement are unclear and do not appear to reflect and include requirements of the county school regulations (i.e Title I, special education, etc). 18.5 & 18.6 These are basic requirements but our elementary school presently are not equipped to accommodate these proposal. 18.7 Quality programming is recommend throughout this document. The caseload nullifies the quality of this policy. The ratio of 20 children to 2 adults reflect quantity and not quality. We strongly suggest that the caseload limit be lowered to reflect the individual needs of young children. It should consider the very special individual needs of children with disabilities. The adult/child ratio must be flexible to accommodate specific needs. For example, cerebral palsy, autism, Down Syndrome, spina bifida, behaviorally challenged, fetal alcohol syndrome, and those exposed to drugs in utero.	N A-addressed in revision 8.1 A-addressed in revision 14.1&14.3 N NA-specific only to children with special needs addressed in WVDE policy 2419	+ o - + -

Date	Individual/Organization	Comments	Action/ Type	
11-20-02	Carl Mace Family Development, Inc Head Start 925 24th Street Parkersburg, WV 26101	Comments/Suggestions 128-28-1. General. 1.1. Scope. Please reference the Federal code by number 1.2. All participating agencies should follow the most stringent in effort for all component area of Policy 2525. 126-28-2. Guidelines. 2.1.1. Please reference the Federal code by number. 126-28-4. Parent/Guardian Involvement and Family Support. 4.1.2. A minimum of one home visit per semester should be required. 126-28-6. Collaboration and the County Plan. 6.5 thru 6.9 County/agency pupil transportation directors have been inappropriately omitted. They are responsible for organizing pupil transportation logistics, such as building bus routes and writing schedule descriptions; coordinating school and busing schedules; as well as the transfer of students between and among other buses/other modes of transportation used to transport pupils to/from school/classroom sites. They cannot coordinate these activities without key information provided by the other entities named in 6.5 and 6/6, in order to meet the requirements of 6.9. Additionally, it need to be noted the height of the first step(riser) on a full sized school bus may not exceed 14 inches. Can these three and four year old children deal with such. 126-28-7. Waivers. A number of small, rural West Virginia counties will have little difficulty meeting Requirements 7.11., 7.1.2., 7.1.3., and 7.1.4. No safeguards appear to be in place to prevent a county from selling school buildings no longer in use or expending marginal financial surpluses so as to ensure that it will receive a waiver from full implementation of WV Pre-K. 126-28-8. Personnel Standards. Regarding 8.1, and 8.2., and 8.3., a preschool SPED teacher is certified to teach all children with various typed of delays, but h b	N N N N A-addressed in revision 4.1.1 NA NA A-addressed	

Date	Individual/Organization	Comments	Action/ Type	
		delays but they are required in Policy 2525 as unable to teach a typical, developing child. Under this policy, a regular ED Pre-K Teacher with NO training in SPED does not have to be SPED certified to teach the developmentally delayed child. Obviously, the present Policy 2525 requirements may be construed as unfair and unequal treatment of those within an occupational grouping and could be grounds for grievances/law suits. 126-28-12. Transition and Continuity. 12.1.7. Any existing policy requiring the transportation of students by the county of residence to a nearby county that provides mandated service not offered by the county of residence, should be included and referenced by policy number in this section. 126-28-15. Transportation. 15.1 Some rural West Virginia counties must transport over 90 percent of their students to school. This section apparently assumes that all single-parent households, nationally estimated to be 40 percent of all households, have the means of transporting their three and four year olds to classroom sites and providing transportation for county and extra-curricular trips. 126-28-18. Financing. 17.1 Does this EXCLUDE the inspection of Headstart buses by WVDE School Bus Inspectors? 126-28-18. Health and Safety. 18.8 U.S.D.A.. guidelines should be referenced by name and code number. Will the WV Commissioner of Agriculture provide Federally Donated Foods Inspectors to, at least annually, verify inventory and accountability; safe and proper storage, as well as identify misappropriation/theft; timely usage, and order the disposal of outdated Federally Donated Foods used by any collaborative agency involved in WV Pre-K? 18.9 Federal guidelines for Headstart agencies state that the safety and welfare of all children shall be ensured. Therefore, Head	A-see revision 8.1 NA NA N	- o - o

Date	Individual/Organization	Comments	Action/ Type	
		Headstart guidelines for immunization.		
11-20-02	Wayne Simms Marshall County Schools P O Box 578 Moundsville, WV 26041	Comments/Suggestions 126-28-1. General. 126-28-3. Definitions. 3.6 Being toilet trained should be a condition of entrance into the program. Budget limitation faced by school systems should be considered in establishing this type of requirements. 3.7 The three and one half hour per requirement is not realistic or appropriate. This precludes the teacher form working with two different groups during any given day. It does not allow for flexible use of staff or facility. The requirements of three consecutive days per week again limits staff and site utilization. Is this the most optimal schedule for students? 126-28-4. Parent/Guardian Involvement and Family Support. 4.1.5 All preschool students should not be expected to be fully included in regular education classes. The extent of inclusion should be based on the individual student's IEP.... not on an arbitrary standard. 126-28-6. Collaboration and the County Plan. The due date for the plan should be moved to June 2004. Given the delay in the passage of te policy, the June 2003 is not a realistic date for the development of such a comprehensive and broad based plan. This policy is an Education Policy. Why is DHHR approval necessary? 126-28-14. Staff Development and Training. 14.2 Professional Development should follow whatever process is most appropriate for the particular situation. Why must we be mandated to follow the WV STARS process?	NA-This is a readiness program A-addressed in revision 3.8 N-policy adheres to WVDE policy 2419 NA- §18-5-44 NA-necessary to build a statewide system	- - o - o

Date	Individual/Organization	Comments	Action/ Type	
11-20-02	Wendy Clutter, Marshall County Schools P O Box 578 Moundsville, WV 26041	Comments/Suggestions 126-28-1. General 126-28-3. Definitions. 3.7 The three and one half hour per day requirement is not realistic or appropriate. This precludes the teacher from working with two different groups during any given day. It does not allow for flexible use of staff or facility. The requirement of three consecutive days requires students to possibly be out of the learning environment for four consecutive days. This causes difficulties with retention and is not the best schedule for families and children. The requirements of three consecutive days per week again limits staff and site utilization.	A-addressed in 3.8	-

Date	Individual/Organization	Comments	Action/ Type	
11-20-02	Ohio County Schools 2203 National Road Wheeling, WV 26003	Comments/Suggestions 126-28-1. General. 2.1.1 and 2.1.5 seem to conflict. Is it 4 year olds only, or 3 and 4 year olds? 2.1.7 - This should read "employ certified staff..." 126-28-3. Definitions. 3.6 - Four year olds should be toilet trained as a condition of entrance. Providing changing stations will incur additional expenditure on already strained budgets. 3.7 Consecutive days per week is not realistic and impedes flexibility and creativity. Three and one half hours per session is too long and eliminates the possibility of two sessions per day resulting in fewer students served. 126-28-4. Parent/Guardian Involvement and Family Support. 4.1.1 and 4.1.2 have no place in policy. They are far too prescriptive. 4.1.5 - It is unreasonable to expect that all students with special needs will benefit from full inclusion. Provisions for alternative preschool classes must be made for some students (for example: severely autistic, tube fed, etc.) 126-28-6. Collaboration and the County Plan. 6.1 - Because the passage of this policy has been delayed, June 2003 is a short turnaround time. To prepare a thorough and functional plan, the due date should be moved to June 2004. This still allows up to 9 years for implementation. This policy is being developed under the aegis of the West Virginia Board of Education, and county plans are required by county boards of education. Why is approval needed from DHHR? 6.3 - It seems redundant and inefficient to re-submit plans every year for up to 9 years, although implementation may not occur sooner due to the extreme financial responsibility. 6.4 - Collaboration with community programs is welcomed, but the prescription of an arbitrary percentage of collaboration is cumbersome and will impose an unnecessary burden on counties and agencies. It also could have the negative effect of decreased level of services.	A-see 2.1.2 NA-too restrictive to build capacity NA A- see 3.8 NA- more requests to keep than delete NA- adheres to WVDE policy 2419 NA- in§18-5-44 A-see revision 6.4 A-see above	- - - - - - - - -

Date	Individual/Organization	Comments	Action/ Type	
		126-28-8. Personnel Standards 8.1 - Requiring certified staff is commendable. 126-28-9. Regulation of Facilities. 9.1 - WV Board of Education is responsible for all aspects of education. Why is it necessary to mandate supervision from DHHR, and outside agency? It will be very difficult to serve two masters. 126-28-11. Curriculum and Assessment. 11.4.1 - Should read: "be based upon the county mission and goals and follow the West Virginia Content Standards and Objectives." All other parts of this section are far too prescriptive and should be eliminated. 11.6 is particular affront because qualified, certified teachers will teach effectively with such instruction. Effective policy is a framework based on current research that allows room for extension and enrichment by policy implementers. Policy should not be a laundry list of confining and sometimes conflicting activities that will detract from programming in many centers. 126-28-12. Transition and Continuity. 12.1 Attention to transition is critical. This statement should read: "Each program participating in the county plan must have a written and implemented plan for transitioning children into kindergarten." The statement should end there. Please see Paragraph 2 above under 126-28-11. 126-28-14. Staff Development and Training. 14.1 - The staff development requirement of 18 hours annually is reasonable, however, effective staff development i more personalized and based on needs. Please do not mandate the topics of annual staff development! 14.2 Please change this to read: "....professional development opportunities MAY follow the WV STARS process. There may be more effective ways to achieve desired results. 14.3 This policy is not written for certified public school teaches. Please consider allowing the public school sites to follow the existing rules for maintaining the teacher license.	N NA-18-5-44 NA-certified teachers don't guarantee appropriate curriculum. Curriculum/assessment standards are research based. NA-section based on research, SREB recommendations N NA A-clarified in 14.3	+ o - - - - o

Date	Individual/Organization	Comments	Action/ Type	
		126-28-1. Program Oversight. 16.1 This section is unclear, but it appears that it could result in two sets of rules, and resulting ill effects.	NA-based on §8-5-44	

Date	Individual/Organization	Comments	Action/ Type	Rationale
11/13	Nancy Dusci	Comments/Suggestions 3.7 I believe that each 4 year old child must be provided a minimum of 3 consecutive days and for no less than three and one half hours each day but no more than 4 hours per day. 126-28-4 Parent/Guardian Involvement and Family Support. I think each county should be required to have a plan to involve parents in areas of Parenting, and Literacy. 126-28-6 Collaboration and County Plan. 6.4 - I believe that 50% of the four year old classrooms be contracted to community programs. I also believe that the county can have access to those programs to support them throughout the community. 126-28-8 Personnel Standards 8.1 I also agree that the teaching staff must hold a qualifying certification/endorsement. 8.2 I agree with a full time permit must be issued and valid for one school year and shall expire on June 30. 8.3 I believe the aides and assistants must have a plan of action for their education needs. 126-28-11 Curriculum Assessment Transition to Kindergarten must be incorporated as one of the components 126-28-9 Regulation of Facilities and 126-20-18 Health and Safety. I support all state licensing regulations or the Head Start Performance Standards at a minimum for requirements for all programs to meet.	N N N N N N N N	O O + + + + + +

11/20	RESA VIII Head Start	Comments/Suggestions 126-28-1. General. Very appropriate especially 2.1.6 2.1.1.1 Teacher child ratio of 1-10 which is current guidelines is too large Voluntary Participation - good - unfortunately some will not be participating due to lack of transportation or a county who gets a waiver 126-28-3. Definitions. 3.7 - minimum of 3 ½ hours - 3 consecutive days - Needs to be changed to accommodate other alternatives such as few hours - more home visits as an option so Head Start or the counties can design programs that best meet children and family needs 126-28-4. Parent/Guardian Involvement and Family Support. Very important aspect - Needs to include <u>home visit</u> not just a conference 126-28-6. Collaboration and the County Plan. 6.4 flexibility needs to be used 50% in one area of the county with rural centers for few day cares In one area more than 50% maybe be eligible for Head Start 126-28-7. Waivers. If it is a growing county where lack of space may be a problem funds for this building program especially start up funds needs to be made available otherwise the counties will opt for waivers 8.2.3. persons with AA degrees get 5 years to become certified Will pay be at a teachers rate or AA rate? 126-28-8. Personnel Standards. 8.1 A must. Qualified teachers with a preschool background are essential this needs to include degrees in pre-school	N N A A A N N N	+ - -3.8 o4.11 o4.1.1 o6.4 o +	

			pre-school special education because they are trained in typical and atypical development. If you want inclusion you <u>Need</u> teachers with disabilities skills	A	o8.1
			126-28-9. Regulation of Facilities. Good to have all classes meet day care regulations. Currently the school systems does not have to comply which I have never understood.	A	+9.1
			126-28-10. Standards for Preparing Students. Good to standardize the objections	N	+
			126-28-11. Curriculum and Assessment. Who chooses the curriculum - each classroom or the county? Essential components are listed .. keep ALL of these	N	+
			11.5.1 add sand and water play Excellent No <u>desks</u> - no <u>work sheets</u>	N	+
			126-28-12. Transition and Continuity. 12.1.1 I like the idea of kindergarten field trip	N	+
			126-28-12. Inclusive Environments. 13.2 This may not be totally possible due how families are located in areas.	N	o
			126-28-15. Transportation. Appropriate transportation for preschool according to state Transpe/Tots should be available	N	o
			126-28-17. Financing. Start up funds need to be available	N	o
			126-28-18. Health and Safety. Screenings needs to include dental and well child check up	N	o

11/20	Susanna Villers Wetzel Co. Schools Attendance Director 333 Foundry St. New Martinsville, WV 26151	Comments/Suggestions 126-28-2. Guidelines. Language is not consistent w/regard to three and four year olds (2.1.1/2.1.5) 126-28-3. Definitions. 3.7 - needs more flexibility for families. Suggest "10/5 Hrs per week" 126-28-4. Parent/Guardian Involvement and Family Support. Glad to see parent involvement 126-28-5. Attendance. 6.1 Initial due date, June 27, 2003, is too soon to provide adequate planning. 6.4 Collaboration based upon individual student needs is appropriate. Mandate of 50% indicates other motives which may not be in the best interest of the child 126-28-8. Personnel Standards. 8.1 Good! 126-28-9. Regulation of Facilities. 9.1 Public schools already have facility regulations & monitoring. Programs outside of public schools are the only ones that need monitored by other agencies 126-28-10. Standards for Preparing Students. Good 126-28-11. Curriculum and Assessment. 11.6 Delete. Professional teachers should be permitted to discern appropriate methods and practises. 126-28-12. Transition and Continuity. 12.1 Important concept, but should be left up to individual counties how it will be handled. 126-28-14. Staff Development and Training. 14.1 Counties should determine professional development based upon needs of the program (staff & children). 14.2 Should not be dictated, but decisions of professional development left up to the county. 14.3 WV already outlines teacher/aide requirements. This training interferes with locally identified needs.	A A N NA N N N N N NA N N N NA	- see 2.1.2. - see 3.8 + - based on 18-5-44 o + o + - not necessarily o - - policy states based on professional development need assessment -	

11/11	Linda Bunce P. O. Box 608 Cool Ridge, WV 25825	Section 126-28-18, Health and Safety, 18.7 I have been pushing for inclusion in our county since I began teaching her, nine years ago. But inclusion has to have the staff to support the success of the child. Please consider making the ratio 3 adults to 20 children, if the special needs caseload is heavy in the class. Or base ratio on some kind of system of weighing the intensity of needs of the children being served. We often have children with very severe health or behavioral needs, sometimes to the point that one adult must be in close supervision of that child at all times. It will not be safe or healthy to just add 8-10 typical children to that mix, with the same number of adults, no matter how well trained the staff. Our ratio is currently 2 adults to 8 children. For some of these more severely involved kids, (with autism, mental impairment, orthopedic impairment, for example), once they enter kindergarten and receive a special ed. label the ratio will actually go down to 2 adults per 4-6 children. I am particularly concerned that young children with autism will not be having their needs met. They need special structure and intensive behavioral training, in addition to inclusive experience. Re 18.6, the proposed 35 square feet per child –Dream on! This will rarely be available in the school system. You may want to add something about four walls, especially if the ratio of children to adults is going to remain so high. Some of the current preschool rooms are in open classrooms, making supervision that much more challenging, when children are developmentally delayed and take time to train to stay within an area.	N	- based on NAEYC standards and includes reference to WVDE policy 2419
		N	o Based on NAEYC, Head Start and Child care regs/standards	

11/5	Tim Fairmont, WV	126-28-15. Transportation. It would be a shame to not to make transportation services mandatory. As a tax paying citizen as well as a child advocate this service is vital for families. To truly service all the children this service must be included. It is not fair to the families that do not qualify for Head Start nor has a child that qualifies for preschool special needs no transportation! 126-28-11. Curriculum and Assessment Very little is said about playground. Many playgrounds are funded by the PTO's. Most playgrounds are not designed to meet the preschool children needs—who will be left to pick up the cost.	NA	- Steering Team did not want mandated transportation to be a deterrent to implementation o in 126-28-9
11/6	KDTTRIO@aol.com	126-28-4. Parent/Guardian Involvement and Family Support. School boards collaborating with Head Start programs must understand and adhere to all the regulations dealing with Parent Involvement. Parents should be and encourage to volunteer in their child's classroom. For example, many schools during party days only allow two parents to participate. How is that creating true parent involvement. Policy Council should also be apart of the process of hiring teachers. 126-28-15. Transportation. Transportation should be made mandatory if you want to reach all the children in each community. 126-28-14. Staff Development. A grandfathering clause should be given to staff that have a two year degree in child development and three years of classroom experience. These individuals should be allow to teach for the BOE.	NA	o see above - 18-5-44 requirements

11/4	Bobbie Gibson Warash, Ed.D Professor, Child Development Director, WVU Child Development Laboratory	2.1.7 As a professor, I am glad that you have included child development in the list with early childhood. 3.7 The 3 consecutive days is good but need to specify the number of allowable days—or at least a range. Some counties think that you must have 180 days for the 4 year old programs. With requiring 3 consecutive days, it implies that 180 days are not necessary—which is good but needs some clarification. I suggest subtracting 2 days a week times the number of weeks of school year. The children are only 4 and it does not seem appropriate to require a full week or 180 days. under curriculum - 11.1 It is good to have a list of approved curriculums to use but need to have some flexibility—for example, the WVU Nursery School uses several sources and curriculums (not just one) and enhances these with our own research in curriculum. Counties should encourage variety in the programs and not say all 4 year old programs must use the same. 11.3 Assessments need to include a variety of performance based such as Work Sampling System etc. 11.6 great paragraph 18.7 20 is to many for some classrooms	N A A A N N	+ o see 3.8 o see 11.4.12 + o	

11/20	Beth Hall WVDHHR, Office of Early Care and Education Room 691 350 Capitol Street Charleston, WV 25301	126-28-1. General. No comment. 126-28-2. Guidelines. No comment. 126-28-3. Definitions. 3.6 Does eligible child need to include WV resident or is this covered by statute? 126-28-4. Parent/Guardian Involvement and Family Support. No comment. 126-28-5. Attendance. 5.1 The committee supports the voluntary nature of WV Pre-K and encourages the Department to keep WV Pre-K voluntary. 126-28-6. Collaboration and the County Plan. 6.4 The committee supports this policy and recommends that the requirement to keep 50% of the classrooms in the community setting not be changed to a smaller percentage. 126-28-7. Waivers. No comment. 126-28-8. Personnel Standards. No comment. 126-28-9. Regulation of Facilities. No comment. 126-28-10. Standards for Preparing Students. No comment. 126-28-11. Curriculum and Assessment. No comment. 126-28-12. Transition and Continuity. 12.1.7 The committee supports minimizing the number of settings and recommends: that the county plans must describe the enrollment process for families; that the enrollment site be accessible to working parents; that families may use a classroom out of county if the county has the opening using existing transfer policies. 126-28-13. Inclusive Environments. The committee supports the inclusiveness of this policy.	N N N N N N N N N N N N N N N	O O O + + O O O O O O O + +

	Beth Hall (continued)	126-28-14. Staff Development and Training. No comment. 126-28-16. Program Oversight. No comment. 126-28-17. Financing. 17.2 Replace the word "support" with "directly benefit". 126-28-18. Health and Safety. The committee recommends that policy be added which requires: 1) Supervision of children during drop-off and pick-up time must be arranged; 2) Supervision of children during outside play/recreation must, at a minimum, maintain the classroom ratio. 126-28-19. Program Evaluation. No comment.	N N N N N	o o o o Included in 9.1 o	

11/20	Ann Nutt Director of Early Care and Education Quality Initiatives WVDHHR Childcare Unit	Comments/Suggestions 126-28-3. Definitions. 3.6 Eligible Child - Support the inclusion of "toilet trained" in the definition. It is important that all four year olds be included. I wonder if we need to consider defining a "curriculum enhancement" and a curriculum. 126-28-6 Collaboration and the County Plan 6.4 - The inclusion of a % of classrooms to be community based is extremely important to building a quality system of early care and education in our communities. - I would like to see clarifying language around "cannot meet the mandates of this policy" that would give clarity to the need to pool human and financial resources to help partners meet the mandate of the policy. IE- that plans that exclude community partners would show efforts made to support partners, such as placing certified teachers etc in a community program so that they could meet the expectations. This is important in order to meet other parts of the policy related to continuity and minimizing the no. of changes for children in one day. 126-28-8 Personnel Standards - I support the specified certifications that include specific early childhood and child development information. - I support the opportunity for individuals with an AA in child development/ early childhood or occupational development with and emphasis on child development/early childhood to have full time permit. This is essential for building capacity	N N N A N N	+ o + o see 6.4 + +	

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	Ann Nutt (continued)	126-28-13 Inclusive Environments 13.1 & 13.2 I strongly support the concept of fully inclusive classrooms as much as possible. 126-28-19 Program Evaluation 19.1 I support the use of the ECERS to evaluate classroom environment.	N N	+ +	
11/15	Donna A. Burge	I would like to respond to the policy on 4 year olds by stating that I am not in favor of making Headstart and Daycare people certified teachers. Calhoun County strives to make its educational system as good as possible and already has 4 year olds attending school 2 full days a week. If the policy is implemented for 3 half days Calhoun Students would be losing valuable instructional time. Transportation cost is another issue for this county. Our county is very sparsely populated and 3 additional bus runs would be a financial burden on the county.	NA NA NA	- o	- no requirement for half day
11/15	Carolyn Nester Arnoldsburg School	We are a small community. Pre-School through 12th grade students; ride together on the same buses. They all attend school a whole day. Our county doesn't have the funds to run buses at noon also. We don't have the extra room to accommodate these children. We also have certified teachers waiting for jobs in Calhoun County. It wouldn't be fair to give people teaching certificates, who haven't even been to college. We Paraprofessionals are more qualified to teach and have more experience than most people who work to Head Start programs.	N	-	

	Josi	*Concerned about afternoon classes only being 2 ½ hrs long. And they want 3 1/2 hour classes *How Headstart is suppose to be it individual program How that will work with the public school system *Will 4 yr olds still be able to be in class w/ 3 yr olds. W/different hrs required for 4 yr olds. *Will Headstart help employees that does not have their associates degree to obtain them. *I feel it is great the over - income children will have the same educational opportunities as the lower income children.	A N N N N	- see 3.8 O o o +	
	Kathy M. Lisa A. Lori W.	1. What about space/in public school build. Could we lose our spot at the public school 2. About 3 ½ hr. days. Will there be double class? Will it be morning/afternoon? 3. What is classroom size children to teacher/aide? 4. Will meals be served family style/staff require to eat with them? 5. If community children are in our classrooms do they have to have 2 h.u./physical/dental 6. Concern about bus transportation Are 4 yrs allowed on the early bus with high school kids	N A N N N N	o o see 3.8 o addressed in 18.1 Head Start standard	

	Rebecca Miller Pleasant Hill School Kindergarten Teacher HC 68, Box 2 Grantsville, WV 26147	126-28-3. Definitions. It is not feasible for a rural county to provide half-day classes due to transportation difficulties. Preschool classes should be offered on alternating days so students can rest in between given long bus rides, length of the school day and physical demands of young children. 126-28-6. Collaboration and the County Plan. Our county shares students enrolled in Head Start and Day Care. A small, rural county does not have the resources to have 50% Community Programs. Our current program meets the needs of the students. 126-28-8. Personnel Standards. Teachers should be certified to include specialization in early childhood endorsement. All professionals working with preschoolers should be required to meet the same teaching standards as teachers working with other students in the County Board of Education System.	N N NA	- half day programs not in policy - addressed in 6.4 - see section 8	
	John Queen Pleasant Hill School Teacher - 3rd Grade HC 68, Box 2 Grantsville, WV 26147	126-28-3. Definitions. It is impossible for rural counties to have ½ day classes due to transportation concerns. Having students come on alternating days is best. Any other arrangement would cause too many concerns. 126-28-7. Waivers. Having 50% community programs would have a negative effect on our program. Please consider this responsibly. 126-28-8. Personnel Standards. Current teaching certificates to include specialization in early childhood endorsement.	N N N	- see above - see above - see above	

Kristie Ritchie 1 st Grade Teacher Pleasant Hill School HC 68, Box 2 Grantsville, WV 26147	126-8-1. General. Teachers of any age group should be certified early childhood professionals. 126-28-3. Definitions. Alternating days for preschool students is more age appropriate. Rural counties, like ours, cannot provide ½ days for children due to transportation costs. 126-28-4. Parent/Guardian Involvement and Family Support. Home visits are a must when working with preschool aged children. This visit provides children/parents/teachers to establish an early home/school relationship. 126-28-6. Collaboration and the County Plan. We have 2 small day cares in our rural county. Therefore to have 50% community programs would be a problem. Policy makers need to look at each county individually to see if they are meeting student needs. 126-28-8. Personnel Standards. - Early childhood endorsement - Certified professionals	A N A A A	o see section 8 o 3.8 o see 4.1.1 o see 6.4 o see section 8		
Larry Stinn Principal Pleasant Hill School HC 68, Box 2 Grantsville, WV 26147	126-28-3. Definitions. 3.7 Half days would not be possible because of transportation in a rural county like Calhoun. Three consecutive days would not be good for children attending our all-day pre-school program. They need to alternate the days. Leave that decision to local school systems. Define this requirement in terms of minutes per week. 126-28-6. Collaboration and the County Plan. 6.4 Do not require use to eliminate a school-based pre-school program (or part of it) to satisfy. 126-28-8. Personnel Standards. 8.1 Maintain existing requirements for the certification of teachers and aides - paraprofessionals. Do not lower these standards and do not grandfather in employees of Head Start or Day Care Centers.	NA NA NA	- see 3.8 - policy doesn't eliminate -		

Patricia R. Haught Preschool Teacher Pleasant Hill Elementary School HC 68, Box 2 Grantsville, WV 26147	126-28-1. General. 2.1.7 The school system should employ professionals who are teachers with a specialization in early childhood. 2.1.11 Class size should be limited to 5:1 ratio when working with young children, especially when those young children are not potty trained. 126-28-3. Definitions. 3.7. It is next to impossible for rural counties to offer half-day preschool classes due to transportation issues. Preschool classes should meet on alternating days if students are attending full days. We need to focus on the amount of time per week that the child is given rather than consecutive days or half days. 126-28-4. Parent/Guardian Involvement and Family Support. 4.1.2 Home visits are a very important part of preschool and a necessity for building a positive home/school relationship that will last for many years. However, teachers need to be allotted time in their schedule to conduct these visits. 4.1.5 Integrated preschool classrooms need certified professionals and paraprofessionals working with the children. 126-228-6. Collaboration and the County Plan. 6.4 Small counties do not have resources and personnel to have 50% community programs. Our county currently shares students with daycare and head start. Policy makers should look at individual counties and see what they currently have in progress and see if that meets the needs of the students in their county. 6.5 The state has spent money on developing and training representatives from all early childhood programs to form Tadpole teams in each county. 126-28-8. Personnel Standards. 8.1 Current teaching certificates to include specialization in early childhood and early childhood special education endorsements. 8.2.2 All professionals working with preschool students employed by a County	A NA N A N N N A NA	o see section 8 o Not affordable or based on research o not requiring half days. See 3.8 + see 4.1.1 o o addressed in 6.4 o o see 8.1 See 18-5-44	

		employed by a County Board of Education should be required to meet the same teaching standards as teachers working with other students. 8.3 Persons employed to meet staff/child ratios such as aides, paraprofessionals should be paraprofessionals as outlined in the WV School Law 18A-4-8 paraprofessional 18A-3-2a. 126-28-14. Staff Development and Training. 14.3 45 hours of training should be decided by the collaborative team or tadpole team. Teachers employed by county BOE should not be required to do additional staff development hours to meet county plans. 126-28-17. Financing. Adequate funding needs to be in place to implement quality preschool programs. Programs use a lot of consumable materials and these need to be replaced quite often. Funding should also be provided for educational field trips and to reinforce learning opportunities.	NA A N	o policy 2525 covers more than Public Ed and only sets minimum standards - see 14.1 o legislative issue	
	Dorothy G. Nemitz Paraprofessional Preschool/handicapped classroom HC 68, Box 17-D Grantsville, WV 26147	126-28-1. General. Teachers should be teachers with a specialization in early childhood. Class size should be kept as small as possible. Preschoolers require a lot of care. 126-28-3. Definitions. We are a rural, economically deprived area. We could not afford to transport students half days. 126-28-4. Parent/Guardian Involvement and Family Support. Home visits are invaluable. Not only do they set the tone for the child's entire educational life, but it affords the teacher's a more comprehensive view of the child and their needs. 126-28-8. Personnel Standards. Standards should not be waived. Teachers should have the same requirements as others in the district. "Aides" should be paraprofessionals.	A N A NA	o see section 8 - 4.1.1 see above	

	Kim Batten Physical Education Instructor HC 68, Box 2 Grantsville, WV 26147	126-28-1. General School systems should employ professionals who are certified with specialization in early childhood. 126-28-3. Definitions. Half day is impossible for rural counties! This alternating day gives these "young" students a day of rest in between.	A N	o see section 8 - not required	

qu	Jeff Huffman Coordinator of Federal Projects Lincoln County Schools 10 Marland Avenue Hamlin, WV 25523	126-28-3. Definitions. 3.1. Indicates that ESEA funds may be used to provide services required in Policy 2525. It is my understanding of current guidelines that the use of ESEA/Title I Funds to provide a requirement would create an issue of supplant. 3.7. Requires that classes meet 3 consecutive days per week for a least 3.5 hours per day. My experience gained by implementing a preschool program and supervising such has taught me that 2 days per week of full day classes are much more effective than ½ day classes. For many parents, transportation problems or issues of work schedules do not make ½ day class meetings effective. 126-28-6. Collaboration and the County Plan. Why are educational plans being submitted for approval to the West Virginia Department of Health and Human Resources? At what point did the DHHR move into the business of educating children? If the West Virginia Department of Education is not capable of adequately implementing educational programs, what higher level of expertise does the WVDHHR have to offer. This is the most outlandish happening that I have seen during the 16 yrs. That I have been in education! (6.4.) If the goal of this movement is to work toward strengthening the Head Start Program, just say it and don't try to mask it in this or future policies. It is silly to hold a LEA accountable for what others are implementing and that is what will happen. 126-28-8. Personnel Standards. If this is a program proposed, required and/or sanctioned by the WVDE, why not simply say that West Virginia Personnel Laws/codes apply accordingly. When a school system employees staff for this or any other program, policies governing the employment of personnel. If not, the union represents teachers and service personnel will file one grievance after another. If it is not a WVDE sanctioned program, LEA's have no business participating! What is AA and WV STARS? Maybe I should know, but I don't and it would have been helpful if I would have had an explanation. 126-28-9.	N A N N N	o o see 3.8 - in 18-5-44 o -/o based on 18-5-44

	Jeff Huffman (Cont.)	126-28-9. Regulation of Facilities. Are we looking at implementing an educational program or providing child care services? If it is an educational program, the WVDE and OEPA have guidelines that govern facilities. If we are discussing child care services, then leave that to the organizations that are in that business. I, as well as other parents, assume that responsibility when we bring a child into the world. 126-28-11. Curriculum and Assessment. 11.6.1 - The statements in this section dictating the exclusion of student desks, mimeographed worksheets, and long periods of sitting appear to be in direct violation of a recent grievance decision in Cabell County. (Arbaugh vs Cabell County BOE, Docket No. 02-06-110 (Aug. 8, 2002.)). Dictating individual teaching styles/methods quickly abolishes individual creativity that is necessary for all good teachers. 126-28-13. Inclusive Environments. (13.2.) How will a county partner with Head Start and still meet this guidelines. I have continually seen this program exclude students/children from the program based on the level of income of the family. Parents should be provided all information of each program/site in this area and let them choose what "educational" program/site they will have for this child. 126-28-14. Staff Development and Training. 14.1. and 14.3. appear to be contradictory in nature. 14.1. seems to be in alignment with current standards for professional employees in the current school system. *For those teachers who have completed certification requirements to be licensed to teach in an early childhood setting, this requirement seems to be out of line. I believe the NCLB legislation adequately outlines requirements of highly qualified teachers. 126-28-15. Transportation. Again, the are policies that govern transportation requirements for LEA's. Is there a need to revise those policies to accomodate outside agencies that are providing	N	o	o addressed in revision of 13.2
			N	-	
			A		o addressed in revision of 14
			A		o addressed in revision of 14
			N	o	

	Jeff Huffman (Cont.)	little more than child care services? 126-28-16. Program Oversight. Assuming that this entire program is an educational program, it would appear to me that state oversight should be provided by the WVDE. Local program oversight should come from the LEA if that LEA is to be responsible for implementation and to the accountable for achievement results and the reporting of such. By combining the oversight responsibilities of 2 agencies with different missions & goals, the end result will be confusion, strife, and lack of focus. 126-28-19. Program Evaluation. What exactly is the ECERS designed to assess? I have not seen this instrument, but have heard from those families with it say that this is not a good instrument to evaluate the quality of our educational program.	N	- based on 18-5-44	
11/21	Barbara Phares Willa Shenkle	We would like to add a few thoughts to the comments we submitted on rule 28, West Virginia's Universal access to Pre-Kindergarten System (2525). Would it be possible to "grandfather in" as preschool teachers those teachers who have BA and MA degrees or certification in kindergarten, preschool special needs, or other special education fields who have significant work experience - possibly five or more years - working in child care, preschool, and, or, preschool special needs? A policy like this would enable experienced people to facilitate the start up of this state-wide program. Also would it be possible to consider allowing people with degrees such as the above as well as those outlined in the policy to supervise preschool classrooms such as those provided by community based programs whose teachers may not have degrees, but have valuable experience to offer? Thank you for consideration on these suggestions.	N	- ECERS is the only normed/validated instrument available at this time for evaluation of program	

Stephen C. Albaugh Speech therapist Pleasant Hill School HC 68, Box 2 Grantsville, WV 26147		126-28-1. General. School system should employ professionals who are teachers with a specialization in early childhood. 126-28-3. Definitions. 3.7 Rural counties can not offer half-day classes because of transportation problems. Preschool classes should be on alternating day if the students are going all day. For example Monday/Wednesday/Friday. 126-28-4. Parent/Guardian involvement and Family Support. Home visits are necessary when working with young children.	A N A	o see 8.1 o not required consecutive days based on research o see 4.1.1	
Rebecca Czap Teacher Rt. 3, Box 515 Arnoldsburg, WV 25234		126-28-1. General. School systems should only hire people who have a degree or specialization in Early Childhood Educ. 126-28-3. Definitions. Rural counties can not offer half-day classes because of transportation problems. There is no way preschool can offer 3 consecutive days of preschool. We have to look at how long a day the kids are in school, including bus time. 126-28-4. Parent/Guardian involvement and Family Support. Home visits are necessary when working with young children. This helps establish an early home/school relationship. The preschool teachers need time in their schedule to allow for working with families in their home. 126-28-6. Collaboration and the County Plan. Small counties do not have the resources and personnel to have 50% community programs. Our county currently shares students with day care and head start. The state has trained Tadpole members in each county; this should be developed in to the collaborative planning team. The state needs to provide funding, time and resources to expand these meetings. 126-28-8. Personnel Standards. Current teaching certifications to include specialization in early childhood endorsement. All professionals working with preschool students employed by a County Board of Educ. should be required to meet the same teaching standards as teachers working with other students in the school system.	A N A N	o see 8.1 see above see above o	see all other Arnoldsburg/Grantsville comments

	Lori R. Yost (Cont.)	126-28-18. Health and Safety. Totally agree with these guidelines - especially immunization and health screenings. 126-28-19. Program Evaluation. like the idea of self - assessment and that they are required to submit plan.	N N	+ +	

11/15	Barbara Phares Willa Shenkle Roane Co. Schools Preschool Program	126-28-1. General. I feel the period allowed to submit an initial plan is not long enough to review final version of these regulations and submit a quality plan by June 2003 that includes all items mentioned in 126-28-3.4 126-28-3. Definitions. Could this be flexible such as tow full days? Or four half days? 126-28-6. Collaboration and the County Plan. 6.4 If a current program, such as Head Start, is staffed by non-degreed personnel as teachers, how can this collaboration be arranged? 126-28-7. Waivers. 7.1.3 experienced a decline in enrollment over what period of time? 126-28-8. Personnel Standards 8.1 Does this also apply to community providers or just to the school system. What is a birth to five certification? Does a person with K-8 certification meet qualifying standards? Go 1 grade below certification. A person with EISE has practiced what is written 126-28-11 and 126-28-12. It seems to me that the EISE certification & practical experience need to count for something. 126-28-10. Standards for Preparing Students. Who has written the content standards & where are they available? 126-28-11. Curriculum and Assessment. Where is the list of curricula, curriculum enhancements and assessment processes available? 126-28-13. Inclusive Environments. 13.2 How will this affect Headstart which has economic level guidelines to qualify? 126-28-15. Transportation. 15.1 seems to indicate school system is not required to provide transportation-parent needs to provide. 15.2 seem to indicate school system or who? must provide transportation which is it? 126-28-17. Financing. 17.3 How would this affect a non-profit child-care center with a classroom for 4 yr olds? Currently parents pay for child <u>care</u>. If center collaborates as a 4 yr old classroom, would they not still be able to expect parents to pay for child	N A N N N N N N N N N N	- based on 18-5-44 o 3.8 o o o questions o o o o o	

			care? Would center get school aid funding compensate if they could not charge?			
11/20	Nancy Wiley Mercer Co. Early Learning Center - Pctr Teacher Broadway St. Princeton, WV 24740	126-28-2. Guidelines. excellent! 126-28-3. Definitions 3.6 - If a child under IEP isn't deemed ready for Kg, and still can advance developmentally even with a "label," the county system should facilitate his/her remaining at the preschool level through age five. If parents, et.al. make this decision, the system should not require a five day program just because the child would have a full week in the kg.class. 126-28-6. Collaboration and the County Plan challenging but so appropriate Re: facilities - When 20-23 children are grouped in a former elementary school room, clearly, there is no where near the "shall provide useable floor space of at least 35 sq. ft. per child..." requirement of § 126-20-18/ 18.6. Also, with 20-23 little bodies in this space, where does one provide all the excellent curricula suggestions/ requirements included in this draft, (space has impact on behavior, curricula, et.al.) re: 11.6 Excellent! re: Transitioning - 12.1.3 crucial to quality re: inclusion- Proximity doesn't guarantee true inclusion. Quality programs reflect more than A+B= C. This is an exciting event.	N A N N N N A N	+ o see 3.7 + o + + o see 13.1 +		
11/20	PIECES Professional Development Committee State Level Committee Attn: Co-Chair, Judy Curry WVDHHR 350 Capitol Street, Room 691 Charleston, WV 25301	126-28-8. Personnel Standards. 8.2 The Personnel Committee strongly endorses the language in section 8.2 which allows for permits to be issued for a period of five years and encourages the Department to keep this section as written. 8.3 The Committee would like to add to the language in 8.3. Based on the five year period given in section 8.2, the committee recommends that aides and assistants be given	N A	+ o see section 8		

11/20	Judy Curry Child Care Program Coordinator WV DHHR Division of Early Care & Education 350 Capitol Street, Room 691 Charleston, WV 25301	128-28-6. Collaboration and the County Plan. I strongly endorse the language in this section with regard to the collaboration of all early childhood programs. I strongly support the policy that requires 50% of the classrooms to be in community programs. This will insure that we make the best use of federal Head Start dollars and do not supplant federal dollars with state dollars. It will also address the issue of keeping child care viable. If child care loses all four-year olds, they may not have sufficient funding to keep operating. If they close communities may lose child care options for children birth to three. I strongly urge you to keep the 50% requirement. 6.5 and 6.10 I am concerned that the rules do not require that more than one center be invited to participate in the planning process. With counties that have large numbers of centers, this is inadequate. I would like to add a requirement to section 6.10 that all child care and Head Start programs be invited to attend planning meetings, even though they are not official members of the collaborative team. This provides for an open and inclusive process and no partner will then feel that they were not included. 126-28-8. Personnel Standards. 8.2 I strongly endorses the language in section 8.2 which allows for permits to be issued for a period of five years and encourage the Department to keep this section as written. 8.3 I would like to add to the language in 8.3. Based on the five year period given in section 8.2, I recommend that sides and assistants be given a period of five years to progress from level 2 to level 5 of the STARS career pathway. 126-28-9. Regulation of Facilities. I strongly endorse this requirement but would like to add some additional language. 9.1 I am concerned that the present language does not provide a process for private pre-schools that are not licensed to demonstrate compliance with licensing requirements. I would like to recommend that private preschools that are exempt from licensing that wish to participate in the WV Pre-k program be monitored by licensing specialists and any non-compliance issues and recom	N	+	o addressed in 6.5
			A	+	o see revised policy
			A		o see revised section 9

		recommendations for action be reported to the collaborative county team or to the county board. Monitoring intervals for all WV Pre-k programs should follow time frames established in WV Code, Chapter 49, Article 2-B. Once a report and recommendations for action are made to the OEPA or to the county board/collaborative team, corrective action should occur within a specified time frame. If corrective action does not occur within the time frame, a report shall be made to the State Board of Education. In addition, you have sited the Division of Health Rules, but not the correct rules for licensing. The Licensing Rules the West Virginia Division of Human Services Rules, Child Care Center 78CSR1. Ann Nutt picked up on this. I just wanted to be sure we gave you the correct number. 126-28-11. Curriculum and Assessment. I strongly commend the language in this section. 126-28-12. Transition and Continuity. The transition section is excellent. I strongly encourage the Board to keep Section 12.1.7 in particular. If we look at collaborative planning for young children, WV must look at the needs of the child for education and the needs of the families to have care that enables parents to work or attend school. In other words, we must put the care in education and the education in care. WV schools need to be more responsive to the needs of working families and child care needs to provide enhanced educational services that promote school readiness. 126-28-14. Staff Development and Training. I strongly commend the curriculum requirements of this policy. I would recommend that we broaden the language requiring six hours of education on inclusive environments and just say six hours of education in issues relating to children with special needs. 126-28-15. Transportation. 15.2 I suggest adding language that the collaborative team consider transportation issues in particular for working families and rural families. 126-28-19. Program Evaluation. I strongly support the use of environmental rating scales. However, I just saw one at the Head Start conference which evaluated the classroom on its literacy efforts. It is called th	N	+
			N	+
			N	+
			N	0
			N	+

			called the Early Language an Literacy Classroom Observation. Everyone was quite interested in this new tool. Is there anyway to add something that allows for additional classroom observation tools to be used? The state may wan to look at this.		

11/20	Kim Sobataka/ Wetzel County Schools Preschool Special Needs Teacher RR 2, Box 107 New Martinsville, WV 26155	126-28-2. Guidelines. 2.1.1 Readiness programs for 3 and 4 year olds. 2.1.2 This allows programs to adopt curriculum as research changes. 2.1.3 This is very important for developmentally appropriate programs. 2.1.4 Important to look at the whole child. 2.1.5 This is very important for 3 and 4 year olds. 2.1.6 This will be utilized for children with special needs. 2.1.7 Employ highly qualified staff as defined by NCLB. 126-28-3. Definitions. 3.6 Families should have the option available to choose a program to meet their child's developmental needs. So if a child is of kindergarten age, but the team decides that the best placement would be to remain in a preschool setting this option should be available. 3.7 This program availability must be determined at the site. Due to rural areas and scheduling, each County should have flexibility to try to use best practice theories. 126-28-4. Parent/Guardian Involvement and Family Support. 4.1.4 Follow procedures for the Board of Education's English as Second Language. 126-28-6. Collaboration and the County Plan. 6.1 The timeline should be altered due to the delay in the passage of this policy. 6.4 A mandated percentage for contracted community programs does not allow for the individual counties to plan and <u>collaborate</u> freely. 126-28-11. Curriculum and Assessment. 11.1 This list should be updated regularly as new curriculum are developed. 11.5.1 But not limited to: e. Writing, proper seating for writing includes tables and chairs 11.6 This is not appropriate or necessary to state in this policy due to the previous explanations of best practice and developmentally appropriate methods. 126-28-14. Staff Development and Training. 14.1 Staff development topics should remain open to the discretion of the administration and needs assessment. 14.2 This <u>MAY</u> follow	N N N N N N NA A A N NA A N NA NA N	+ + + + + + - adds expensive federal requirements not currently mandated o 3.7 o 3.8 o Amelia Courts wrote this language - 18-5-44 - see 6.4 in revised policy o - not based on NAEYC recommendations - o based on needs assessment in policy	

			14.3 The public school sites should follow existing rules for maintaining the teaching license. 126-28-16. Program Oversight. This area needs clarification.	N A	o o addressed in revisions

11/20	Terry Greene/ Wetzel County Schools Preschool Special Needs Teacher's Aide RR 2, Box 107 New Martinsville, WV 26155	126-28-2. Guidelines. 2.1.1 Readiness programs for 3 and 4 year olds. 2.1.2 This allows programs to adopt curriculums as research changes. 2.1.3 This is very important for developmentally appropriate programs. 2.1.4 Important to look at the whole child. 2.1.5 This is very important for 3 and 4 year olds. 2.1.6 This will be utilized for children with special needs. 2.1.7 Employ highly qualified staff as defined by NCLB. 126-28-3. Definitions. 3.6 Families should have the option available to choose a program to meet their child's developmental needs. So if a child is of kindergarten age, but the team decides that the best placement would be to remain in a preschool setting this option should be available. 3.7 This program availability must be determined at the site. Due to rural areas and scheduling, each County should have flexibility to try to use best practice theories. 126-28-4. Parent/ Guardian Involvement and Family Support. 4.1.4 Follow procedures for the Board of Education's English as a Second Language. 126-28-6. Collaboration and the County Plan. 6.1 The timeline should be altered due to the delay in the passage of this policy. 6.4 A mandated percentage for contracted community programs does not allow for the individual counties to plan and <u>collaborate</u> freely. 126-28-9. Regulation of Facilities. 9.1 WV Dept. Of Education has facility requirements. This policy is for preschool programs not for child care centers. Therefore, the WV Dept. Of Education requirements should be followed. 126-28-11. Curriculum and Assessment. 11.1 This list should be updated regularly as new curriculum are developed. 11.5.1 But not limited to: e. Writing, proper seating for writing includes tables and chairs 11.6 This is not appropriate or necessary to state in this policy due to the previous explanations of best practice and		See Kim Sobataka

			developmentally appropriate methods. 126-28-14. Staff Development and Training. 14.1 Staff development topics should remain open to the discretion of the administration and needs assessment. 14.2 This <u>MAY</u> follow.... 14.3 The public school sites should follow existing rules for maintaining the teaching license. 126-28-16. Program Oversight. This area needs clarification.		
11/20	RESA I- Focus Group 400 Neville Street Beckley, WV 25801 November 1, 2002 Policy 2525 Munson Hall Raleigh County Board Katie Stump, Wyo.Co.Sch. Knstump@access.k12.wv.us Becky Allen , Monroe Co. rballen@access.k12.wv.us Sarah Lee Brown, Summers Co Schools sleebrown@aol.com Kay Westfall, Summers Co. Schools bkwestfa@inetone.net Sharon Dyer Mercer Co. Schools sdyer@access.k12.wv.us Linda B. Price RESA I lprice@access.k12.wv.us Jeana Comer Carr Monroe Co Head Start jcomercarr@yahoo.com	126-28-2. Guidelines. 2.1.1 Clarification is needed on serving mandated 3 year olds. 2.1.2 Definitive List of appropriate (accepted) curriculum 2.1.5 Definition of Scientific Research 2.1.6 Preschool content standards and objectives along with assessment tools need to be reviewed by core-collaborative planning team 126-28-3. Definitions. 3.1 Counties will need guidance and Technical Assitant on how to blend funds. 3.5 Counties need direction on the types of programs/curriculum that will be recognized as developmentally appropriate 3.6 Final decision when not in mutual agreement (parent/teacher) of advancement to Kindergarten program should rest with the teacher. 126-28-4. Parent/Guardian Involvement and Family Support. 4.1.2 Number of home visits and frequency. After the e-mail change and to or 4.1.3 Definition of transition is needed (vertical on horizontal) 126-28-5. Attendance. 5.1 Clarification is needed on dis-enrolling student for a number of days absent. Clarification is needed on what counts as enrollment in the school system, due to the type of collaboration that (school systems) are required to have with other agencies. 126-28-6 Collaboration and the County Plan Technical Assistant is essential for collaborative funding and use of personnel.	A N N N N N NA A A N N	o 2.1.2 o o o o o o see 4.1.1 o see section 12 o see 3.2 o	

11/20	Carol Zombotti/ Wetzel County Schools Speech-Language Pathologist Wetzel County Center for Children and Families RR 2 Box 107 New Martinsville, WV 26155	126-28-2. Guidelines. 2.1.7 "Staff with strong professional education preparation" should include a full-time permit and Professional Teaching Certificate. 126-28-3. Definitions. 3.6 Should include 3 year old children at risk. 128-28-1 includes 3-year olds. 3.7 Rather than 3 1/2 hours a day for 3 days, this should say 10 1/2 hours per week. This will prepare children better for the full day of Kindergarten. 126-28-4. Parent/Guardian Involvement and Family Support 4.1.4 Support services should guidelines from WV DE English as Second Language programs, including support to learn English language and maintain skills in native language. Each individual's needs should be examined and considered. 4.1.5 Should include support for children with disabilities integrated into programs as appropriate, as well as specialized programs dependent on child's needs and disabilities. 126-28-6 Collaboration and County Plan. 6.4 A mandated percentage of students enrolled in each program will leave behind numerous children in counties that are currently enrolled in public school settings. 126-28-8. Personnel Standards. Personnel should educators with a Teaching Certificate in Early Education, Birth-5 or Pre-k. Persons with AA should not be issued a full-time permit until all requirements for Teaching Certificate are completed. 126-28-11. Curriculum and Assessment. 11.4.b. Should also include assistive technology so that children with all abilities can and may participate in all activities. 11.6 Developmentally appropriate strategies and procedures will be used to teach children necessary pre-requisites of goals and objectives stated in curriculum, including pre-writing activities at desks or tables, mimeographed work sheets to assist in pre-writing exercises, and increasing/learning attending skills through increased lengths of sitting and listening. Should not state what is to be <u>excluded</u>.	A N A N N A NA A NA	o see section 8 o based on 18-5-44 3.8 + + o see revised 6.4 o clarified in revision o added in revision -

		126-28-12. Transitioning and Continuity 12.1.7 If children are only allowed to attend a minimum number of settings, collaboration will not exist. 126-28-13. Inclusive Environments. Policy 2419 and IDEA contains guidelines of where and how children with special education needs should be educated. These statements should be coordinated with Policy 2419 and IDEA. 126-28-15. Transportation. 15.1 Transportation must be provided to children with special education needs as mandated by Policy 2419.	NA A NA	o do not understand intent o see section 13

11/20	Holly Ashby/ Wetzel County Schools MA EISE Preschool Special Needs also certified PreK-K regular education 333 Foundry Street New Martinsville, WV 26155	126-28-2. Guidelines. 2.1.1 and 2.1.5 - conflicting statements - 3 or 4 year olds ?? 2.1.7 - This should read "employ highly qualified staff as defined by NCLB" 126-28-3. Definitions. 3.7 - Need to allow counties the flexibility of "scheduling" while meeting the intent of the law. Perhaps "a minimum of ten and a half hours per week during consecutive days during the school year." 126-28-11. Curriculum and Assessment. 11.1 - This list should be updated regularly as new curriculum are developed. 11.6 Should be eliminated. This does <u>not</u> belong in policy- Identified developmentally appropriate practice will be used by <u>certified teachers</u>. 11.5.1 - e. Writing proper seating for writing includes tables and chairs. Should also read but not limited to: 126-28-12. Transition and Continuity 12.1 Attention to transition is critical. This statement should read, "Each program participating in the county plan must have a written and implemented plan for transitioning children into Kindergarten." 126-28-14. Staff Development and Training. 14.1 Staff development topics should remain open to the discretion of the administration and needs assessment. 14.2 Please change this to read, "...professional development opportunities may follow the WV Stars process. There may be more effective ways to achieve desired results." 14.3 This policy is not written for certified public school teachers. Please consider allowing the public school sites to follow the existing rules for maintaining the teaching licenses. 126-28-6. Collaboration and the County Plan. 6.1 Timeline should be altered due to the delay in the passage of this policy. 6.3 County plans should be submitted for "full implementation" or until 2013. 6.4 A mandated percentage of contracted services will ensure "FAILURE" and negate the spirit of "collaboration" on which successful programs are based.		see Candis Clark

11/20	Susan Hill, MA EISE Parents as Teachers Wetzel Co. Schools P.O. Box 830 Rt. 250 N Hundred, WV 26575	126-28-2. Guidelines. 2.1.7 - Employ <u>highly qualified staff</u> as defined by NCLB 126-28-3. Definitions. 3.7 Counties should be allowed the flexibility of "scheduling" 126-28-11. Curriculum and Assessment. 11.1 This list should be updated regularly as new curriculum are developed 11.6 This does <u>not</u> belong in policy - Identified developmentally appropriate practices will be used by <u>certified teachers</u> 126-28-12. Transition and Continuity. 12.1 Transition is a critical issue. Need written plan for transition!! 126-28-14. Staff Development and Training. 14.1 Staff development should be developed based on the needs of its staff 14.2 Should read "...professional development opportunities may follow the WV Star process. There may be more effective ways to achieve desired results 14.3 This policy is not written for certified public school teachers. Please consider allowing the public school sites to follow the existing rules for maintaining the teaching license.		see Candis Clark

11/20	Bobbie Gelpi, Harrison County Board of Education Director, Early Childhood 408 E. B. Saunders Way - P.O. Box 1370 Clarksburg, WV 26302-1370	126-28-1. General. Applaud the intent to make consistent preschool opportunities available. 126-28-2. Guidelines. Approve the intent to provide developmentally appropriate environments to all children. 126-28-3. Definitions. 3.7 Minimum program availability The length of a day for both WVDE and WVDHHR should be identical. If not, then a 31/2 hour day is too long for personnel purposes. Teachers may not exceed and 8 hour day. The seven hours of instruction does not allow for lunch, planning and travel time. 126-28-4. Parent/Guardian Involvement and Family Support. 4.1.2 Documented methods for communicating with parent/guardian "which may include" We cannot be required to email parents who are not online. 126-28-5. Attendance. 5.1 The final determination for the child's attendance shall be made by the principal for preschool students, just as it is for kindergarten students. 126-28-6. Collaboration and the County Plan. 6.4 Collaboration and the County Plan The requirement for 50% of the classrooms to be in community settings places an undue burden on school systems. Our system is currently operating 30% of its centers in collaboration with other reliable agencies. Some of these are located within the public schools. Why could these not count toward collaborative efforts in community settings? It would seem the intent is not to encourage collaboration, but to be sure that preschool classrooms are not placed in the public school setting. Both the 50% requirement and the definition of community settings should be changed. It also behooves us to consider those groups who may choose (some for religious reasons) not to be part of the plan. These could account for a significant portion of the population of a county, making it even more difficult to achieve the 50%. 9.1 Regulation of Facilities We have attempted to place one of our collaborations	N N A A NA	+ see William N. Ashcraft + - see 3.8 - see 4.1.2 -

			into a child care facility that has been licensed for several years to a private childcare entity in our community. The site has become available to us while the owner is on criminal probation. Both the licensing coordinator and the fire marshal have refused to license that same facility to us for our collaboration. Thousands of dollars have been spent by our collaboration on the physical plant: furnace, steps, paint, carpentry and electrical work. The site is still deemed unacceptable for licensure, even provisionally. Since our efforts have only improved the site, it is difficult to understand how improving it according to the directions of the licensing coordinator and fire marshal have failed to make it licensed and usable for our collaboration, but acceptable for private daycare. 10.1 Standards for Preparing Students Does this standard mean that any participating agency must use the adopted curriculum at all times? What would this mean for daycare centers and faith-based groups? How would this be monitored? 16.1 Program Oversight We need a more well-defined mechanism or model for monitoring program implementation at all sites for all agencies involved in the plan. 17.2 Financing This is another unfunded mandate. Preschool programs are expensive and excellent preschool programs are incredibly expensive.	

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Date	Individual/Organization	Comments	Action/ Type	Rationale
11/20/02	Betsy Knittle Kanawha County Schools Head Start/LEAP teacher Sissonville Elementary 8324 Sissonville Drive Sissonville, WV 25320 304-348-1961	Comments/Suggestions 126-28-1 General 126-28-2 Guidelines. 126-28-3 3.1 Approved funding sources: All of these funding sources have specific guidelines and regulations. While some overlap, pre-K teachers spend a great deal of time doing redundant paperwork. Perhaps a copy of the proposed plan and common paperwork could be submitted to and accepted by each agency before we come to rely on them as a funding source. 3.6 Eligible child: In addition to chronological age, developmental age needs to be considered in the make up of the classroom. The classroom may consist of three years old whose developmental age is twelve months and five year old who are preparing for kindergarten. It will be difficult, if not impossible, to meet all of these needs in a class of twenty children. There needs to be other options available or something added to the proposed plan that would take in consideration the individual needs of each classroom and ways to provide additional staff support. 3.7 Minimum program availability: Mandating three and one half hour sessions in the school system is disastrous. Most elementary schools schedules, especially if busing is involved, run from 8:00AM-3:00PM - Seven hours. If you are going to provide two 3-1/2 hour pre-K sessions a day, they will have to be scheduled back-to-back. That means:	N N A	o o nothing in 2525 prohibits additional staff - see 3.8

		No lunch break or planning time for teacher or aides. (It has been suggested that other teachers in the building could provide this break time, however, most are already assigned to lunch duty.) No time to clean up or to prepare activities for the second session. (Most Head Start/LEAP programs provide "family-style" lunches in the room.) Most important is the issue of safety. Trying to transition up to 40, three and four year olds, some with special needs, in and out of the classroom all at the same time is a daunting challenge. Some stay for daycare, some are picked up by parents and some go on buses. Most of these children do not know their bus numbers, street or route addresses, or phone numbers. The potential for a mishap is very high. I realize that you probably chose this length of time to coincide with the Head Start guideline - 1306.32 (12)(b)(2) Center-based classes must operate a minimum of three and one-half to a maximum of six hours per day with four hours being optional. However, there is another Head Start regulation that has been disregarded for years. 1306.32(12)(c)(3) - Double session variation: Each double session classroom staff member must be provided adequate break time during the course of the day. In addition, teachers, aides and volunteers must have appropriate time to prepare for each session together, to set up the classroom environment and to give individual attention to children entering and leaving the center. (There is currently a grievance pending in Kanawha County Schools regarding this matter.) Perhaps a Federal Head Start waiver could be applied for to reduce the pre-K day to three hours, three to four days a week. 12.28.4. 4.1.1 Parent involvement: Having dealt with parents over a number of years rather than "must" include, I feel that this section should specify that parents "will be given the opportunity" to participate in two parent/guardian conferences. 4.1.3 Transitions: To make these transitions plans work, pre-K and kindergarten teachers must be given time and substitutes to attend meetings and to plan together. 126-28-5 Attendance 5.2 Chronically absent: Typically, families whose children absent, often have numerous personal and social problems. Could something be added to the plan to provide a social work component?	N N A	o o o 5.2

11/20/02	Dept. of Health & Human Services Suite 864 150 S. Independence Mall West Philadelphia, PA 19106-3499	126.28.8 Personnel Standards. 8.1 Grandfather in those teachers who have degrees, three or more years of pre-K teaching experience, and whose evaluations reflect a knowledge of early child development and curriculum. 126.28.10. Standards for Preparing Students. Currently, there is a wide gap between pre-K "play-based" curriculum and the WV kindergarten IGO's. More teachers need to become involved in the early planning process. 126.28.12. Transition 12.1.3 Perhaps pre-K and kindergarten teachers could use the staff training days before the start of school for these transition activities. Unless specific provisions are made, these activities just do not happen.	NA	o	
		126-28-4. Parent/Guardian Involvement and Family Support 4.1 - We wholeheartedly concur with the importance of the involvement of parents in the education of their children, as reflected in this section. To further underscore the value of parent involvement in preschool programs, you may wish to add language to this section that encourages pre-kindergarten programs ot welcome parent involvement in the classroom. Such language might parallel the Head Start performance standards, which require that classrooms be open to parents during program hours. Parents must be welcomed as visitors and encouraged to observe children in the classroom and to participate with children in group activities. 126-28-6. Collaboration and the County Plan 6.4 - We applaud the effort to maximize existing resources by requiring that 50% of the pre-kindergarten classrooms be served through contracts with community providers. This provision will encourage valuable partnerships between local school systems, Head Start, and child care - building upon the strengths and unique features each has to contribute. It will also ensure that new programs are not created where there is already a qualified completion for slots. For the same reasons, we also support the requirement that a portion of the funds generate by the formula be used through the contractual agreements to support compliance with this policy. 126-28-7. Waivers 7.2 - We recommend that county requests for waivers contain the written concurrence of the core community partners who would normally make up the local planning team.		o	See Nancy Elmore

11/20/02	David J. Lett Regional Administrator Department of Health & Human Services Administration for Children and Families Region III Suite 864 150 S Independence Mall West Philadelphia, PA 19106-3499	126.28.4. Parent Guardian Involvement and Family Support 4.1 We wholeheartedly concur with the importance of the involvement of parents in the education of their children, as reflected in this section. To further underscore the value of parent involvement in preschool programs, you may wish to add language to this section that encourages pre-kindergarten programs to welcome parent involvement in the classroom. Such language might parallel the Head Start performance standards, which require that classrooms be open to parents during program hours. Parents must be welcomed as visitors and encouraged to observe children in the classroom and to participate with children in group activities. 126.28.6 Collaboration and the County Plan. 6.4 We applaud the effort to maximize existing resources by requiring that 50% of the pre-kindergarten classrooms be served through contracts with community providers. This provision will encourage valuable partnerships between local school systems, Head Start, and child care – building upon the strengths and unique features each has to contribute. It will also ensure that new programs are not created where there is already a qualified provider in the community, eliminating the potential for duplication of services and competition for slots. For the same reasons, we also support the requirement that a portion of the funds generated by the formula be used through the contractual agreements to support compliance with this policy. 126.28.7 Waivers. 7.2 We recommend that county requests for waivers contain the written concurrence of the core community partners who would normally make up the local planning team. 126.28.8 Personnel Standards. 8.1 & 8.2 We support the mandate that teachers of preschool children be certified in early childhood education or closely related fields, such as preschool special needs. The research clearly demonstrates that it is not effective to teach four year olds in the same manner as older aged children. Research shows that a “push-down” to pre-kindergarten of methods and materials used in elementary school or middle school is inappropriate for preschool children, and can actually be harmful to them. The challenge for preschool teachers is to develop classroom activities that teach while engaging and developing children's interests. This provision would prohibit the transfer of displaced teachers from higher grades to preschool classrooms without first obtaining the credentials necessary to teach four year olds. We urge you to	see Nancy Elmore

	8.2 The provision of full timer permits for experienced early childhood educators who do not hold one of the three qualifying degrees cited in section 8.1 is critical to the success of this initiative. This is the vehicle that will enable community providers to collaborate successfully with local school systems in making universal pre-kindergarten a reality. This provision underscores the relationship between teacher qualifications and classroom quality, while at the same time providing a window of opportunity that enables experienced, high performing teachers in community programs such as Head Start and child care to proceed along a continuum of professional development toward a qualifying certification. We urge you to retain this provision in the final policy. 126.28.9. Regulation of Facilities. 9.1 We support the requirement that all programs serving preschool children meet West Virginia licensing standards, and encourage you to retain this provision in the final rule. 126.28.11. Curriculum and Assessment. 11.1 through 11/6 We fully support his "whole child" approach to curriculum and assessment. These research based standards recognize the cognitive, physical, social, emotional and health needs of preschool children. The level of detail provided in this section lays the groundwork for quality pre-kindergarten programs that support school readiness across a broad spectrum of providers, and safeguards against the "push-down" of elementary school methods and materials in teaching pre-k children. We highly recommend the retention of this entire section in the final policy. 126.20.18. Health and Safety 18.7 We strongly concur with the limitation on classroom size to twenty children, and with the 1:10 ratio of adults to children. The benefits of these standards reach well beyond the important and obvious health and safety considerations. Research has shown that small classrooms and adequate teacher/child ratios are critical to the quality and success of early childhood education programs. Furthermore, these standards will facilitate Head Start's ability to partner with local school systems, since the standards are consistent with Head Start's ability to partner with local school systems, since the standards are consistent with Head Start requirements that set the average class size at seventeen to twenty, with no more than twenty children per classroom. Similarly, the 1:10 teacher/child ratio will also facilitate Head Start's ability to serve as a community program, since Head Start classes must be staffed with two adults –	

		a teacher and an aid or two teachers, and whenever possible, a volunteer. Any increase in the class size or teacher/child ratios proposed in this policy would pose a barrier to Head Start's participation in the universal pre-kindergarten system. Let me close by expressing my sincere thanks to you and your colleagues for your fine work in laying the foundation for universal access to pre-kindergarten in West Virginia. I appreciate the opportunity to comment in support of this groundbreaking policy that offers great promise to West Virginia's young children.			
11/20/02	Anita Milam Beverly Mamone Susie Brock Mitzi Haga Linda Bunce Ann Darby/Diana Chipley Billie Arthur Raleigh County Preschool Special Needs Teacher 136 Sullivan Road Glen Morgan, WV 25847	2.1.15 We feel that an inclusive program is an excellent idea. 8.2.1 We strongly feel that teachers certified in Pre School Special Needs should be qualified to instruct preschool children. They have successfully developed curriculum, taught challenging children, as well as their typical peers. Many have been presenters at state level preschool conferences and adjunct college faculty. He preschool special needs teachers of Raleigh County have participated in many in-service trainings to enrich their professional development. We would strongly recommend that preschool special needs teachers be considered to hold qualifying certification. 14.1 The training requirements are unclear and do not appear to reflect and include requirements of the county school regulations (i.e. Title I, special education, etc.) 18.5 & 18.6 These are basic requirements but our elementary schools presently are not equipped to accommodate these proposals. 18.7 Quality programming is recommend throughout this document. The caseload nullifies the quality of this policy. The ratio of 20 children to 2 adults reflects quantity and not quality. We strongly suggest that the caseload limit be lowered to reflect the individual needs of your children. It should consider the very special individual needs of children with disabilities. The adult/child ratio must be flexible to accommodate specific needs. For example, cerebral palsy, autism, Down Syndrome, spina bifida, behaviorally challenged, fetal alcohol syndrome, and those exposed to drugs in utero.	N A A N N	+ see 8.1 - addressed in revision - - policy includes language adhering to WVDE policy 2419	

11/20/02	Janet Alexander	I, Janet Alexander support these policies because I strongly believe that to implement collaborative classrooms these minimal standards must be met. 126.28.3 Definitions. Page 3 3.7 Minimum program availability means offering each preschool class a minimum of three consecutive days/week for at least three and one half hours per day during the school year calendar. Head Start Program Performance Standards and Other Regulations Section 1306 - Page 249-250 1306.32 Center-based program option. <i>The Standards require that classes must operate for a minimum of three and one-half hours to a maximum of six hours per day with four hours being optimal and that the classes operate a minimum of four days per week. In collaborative partnerships operating days may be negotiated to a minimum of three.</i> <i>I believe that a minimum four year old Pre-k classrooms should operate three consecutive days a week and for no less than three and one-half hours each day.</i> 126.28.4 Parent/Guardian Involvement and Family Support. Page 3 <i>I believe the section of this policy should be strengthened to include: requiring each county plan to address how they will work with each family in the areas of Literacy, Parenting, Employment, and Wellness to that parents/guardians skills can be strengthened as children transition into Kindergarten.</i> 126.28.6 Collaboration and County Plan. Page 4 6.4 In order to support counties in the effort to maximize existing resources and collaborate with other providers of early childhood education, no less than 50% of the classrooms for eligible children must be provided through contracts 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 or cannot meet the mandates of this policy. This may not be construed to mean that counties will provide education services in public school settings only and contract out support services both rather than 50% of the classrooms for eligible children must be contracted with qualifying providers in community settings. This ratio of community to public school providers can only be decreased with the written permission of both the West Virginia Board of Education and the Secretary of the West Virginia Department of Health and Human Resources. When the county	N N N NA	+ + + o policy does not prohibit

		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. <i>Head Start and Child Care have developed licensed classrooms set apart from local public school district's Pre-School programs. I support that a minimum of 50% of the four year old classrooms be contracted to community programs meeting the standards in this policy to provide the classroom space, qualified staff and financial resources to the meet the goal. There will be ample opportunities through county plans to bring public school staff and their resources out into the community to support the community classrooms.</i> 126.28.8 Personnel Standards. Page 6 8.1. Teachers must hold a qualifyin certification/endorsement for teachers, specifically, early education, Prek-k endorsement, or birth to five. 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 January 1 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 126CSR136, West Virginia Board of Education Policy 5202 - Minimum Requirements for the Licensure of Professional/Paraprofessional Personnel and Advanced Salary Classification, Section 15. Full time permits will be issued for: 8.2.1. persons with degrees in preschool special needs, elementary education, child and family studies with an emphasis on early childhood education, or child development, or 8.2.2. persons with a Board of Regents degree with a specialization in early childhood/child development, or 8.2.3. persons with an AA in child development/early childhood or occupational development with an emphasis on child development/early childhood and one year of early education teaching experience. 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 West Virginia State Registry and Training Systems (WV STARS) career pathway level II. Level II is defined as persons who are at least 18	N	+	

		years of experience and possess the ability to understand and practice the core competencies with direction and instruction or through sponsorship of a professional organization or qualified mentor. (Attached). Aides and assistants must have an individualized staff development plan for specifying his/her planned progression on the career pathway toward level V. <i>I strongly support sections 8.2 through 8.3 for qualifications and the full-time permit to assure qualifying certification endorsement of personnel.</i> 126-28-11 Curriculum and Assessment Page 7 - Specific issues addressed in this area need to be/remain incorporated in the planning process for curriculum and assessment of four year old children. The curriculum must be developmentally appropriate-not "watered-down" kindergarten/1st grade curriculum. Components that must be incorporated included: whole child curriculum, emerging skills, pre literacy skills, continuum of development, readiness program and Transition. <i>I believe it is vital to the educational success of the child that parents/guardians are encouraged to participate in the child's learning experience as much as possible.</i> 126-28-9. Regulation of Facilities and 126-20-18 Health and Safety. Page 7 - 9.1. All approved participating WV Pre-k programs, see definitions, that are included in the county collaborative plan must meet the requirements as set forth in the West Virginia Division of Health Legislative Rules Child Care Centers 64CSR21 or any rule promulgated to replace and/or update 64CSR21. Public schools or other programs who are exempt under West Virginia Division of Health Legislative Rules Child Care enters 64CSR21 or its replacement must meet the requirements set for in that rule. In the case of public schools, West Virginia Department of Health and Human Resources Child Care Licensing staff will conduct monitoring and any recommendations for action made to the Office of Education Performance Audits. Page 14 - 18.1. WV Pre-k classrooms must be provided in buildings or structures that are of sound structure and maintained in good repair. 18.2 WV Pre-k classroom facilities shall be equipped with approved heating units sufficient to provide a temperature of at least sixty-eight degrees Fahrenheit (68°F) at floor level in all rooms used by children. 18.3. All buildings or structures housing WV Pre-k classrooms	N	+
			N	+
			N	O

		18.4 Toilet fixtures for all WVC Pre-k classrooms shall be sized so that they may be used by children without assistance, or provide step stools and/or modified toilet seats that are safely constructed and can be easily used in lieu of specially sized toilet fixtures. 18.5 Lavatories in WV Pre-k classrooms shall be provided in or immediately adjacent to all toilet room. Lavatories shall have mixing faucets or be provided with tempered water. All lavatories shall be provided with soap and single services sanitary towels. 18.6. WV Pre-k classrooms shall provide useable floor space of at least thirty-five square feet per child shall be provided and available for children's activities, exclusive of halls, bathrooms, the kitchen, office space, or storage areas. Useable outdoor play space of seven-five (75) square feet per child shall be provided. 18.7. WV Pre-k classrooms shall limit classroom size to no more than twenty children per classroom. Ratios shall be maintained at 1 adult: 10 children with one adult being a certified teacher in accordance with 126-28-8, Personnel Standards. 18.8. 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 West Virginia Department of Education child and adult food program. Programs operating less than four hours will provide a snack as prescribed the West Virginia Department of Education child and adult food program. 18.9. Immunization. All children entering an approved participating WV Pre-k classroom that is participating in the county collaborative plan shall follow the guidelines of the primary (providing 51% or more of the funding that year) funding source regarding immunization. Participating programs that operate within a public school facility must follow West Virginia Code § 16-3-4. 18.10. Health Screenings. All children entering an approved participating WV Pre-k classroom that is participating in the county collaborative plan shall screen children 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 educational shall adhere to West Virginia Code § 18-5-17. <i>Performance Standards 1304 and 1306 - According to Head Start Performance Standards Head Start programs must meet the most</i>

		stringent of regulations for the Safety and Health of enrolled children - by meeting State Licensing Regulations or the Head Start Performance Standards at a minimum. The Regulation of Facilities and the Health and Safety areas of this Policy are minimal requirements to meet. I support requiring all programs serving four year children in a pre-k setting to meet the West Virginia Department of Health and Human Resources Child Care Licensing Regulations. I also support OEPA of the State Department of Education in enforcing any correctional action plans identified through the Department of Health and Human Resources monitoring process.	N	+	

11/20/02	Barbara Phares & Willa Shenkle 927-6440	Here are comments from two teachers in the Roane County preschool special needs program on SB 247, rule number 28. We are returning comment sections, but not the entire copy of the rule we were looking at. We collaborated on all comments. Thank you for this opportunity. W.Va. Const., Article XII, § 2; W. Va. Code §§16-3-4, 18-2-5, 18-5-18c, 18-2E-1 et se., 18-5-17 and 18-5-44. West Virginia's Universal Access to Pre-kindergarten System (2525) 126-28-1. General I feel the period allowed to submit an initial plan is not long enough to review final versions of these regulations and submit a quality plan by June 2003 that includes all items mentioned in 126-28-3-4. On plan from Paula LeMasters but not county office. County office version has more pages on plan date lines, transitions, etc. 126-28-3. Definitions 3.7 Could this be flexible such as two full days? Or four half days? 126-28-6. Collaboration and the County Plan. 6.4 If a current program, such as Headstart, is staffed by non-degreed personnel as teachers, how can this collaboration be arranged? 126-28-7. Waivers. 7.1.3. experienced a decline in enrollment over what period of time. 126-28-8. Personnel Standards. 8.1 Does this also apply to community providers or just to the school system. What is a birth to five certification? Does a person with K-8 certification meet qualifying standards? Go 1 grade below certificate. A person with EISE has practiced what is written 126-28-11 and 126-28-12. It seems tome that the EISE certification a practical experience need to count for something. 126-28-10. Standards for Preparing Students. Who has written the content standards and where are they available? 126-28-11. Curriculum and Assessment. Where is the list of curricula, curriculum enhancements and assessment processes available? 126-28-13. Inclusive Environments. 13.2 How will this affect Headstart which has economic level guidelines to qualify? 126-28-15. Transportation. 15.1 seems to indicate school system is not required to provide	N	based on 18-5-44
		A		o 3.8
		N		o
		N		o
		N		o
		N		o

		transportation - parent needs to provide. 51.2 seem to indicate school system or who must provide transportation which is it? 126-28-17. Financing. 17.3 How would this affect a non-profit child-care center with a classroom for 4 yr olds? Currently parents pay for child care. If center collaborates as a 4 yr old classroom, would they not still be able to expect parents to pay for child care? Would center get school aid funding to compensate if they could not charge?	N	o
			N	o

11/20/02	Barbara Gebhard Project Director Building Early Learning Systems in the States 5313 Pamela Circle Cross Lanes, WV 25313	126-28-2. Guidelines. Suggest combining 2.1.2 and 2.1.5. Change 2.1.11 to "meet recommended (or required) teacher/child ratios and class sizes." 126-28-3. Definitions. 3.5 Suggest substituting "language" for "cultural" or rewording to use the National Education Goals Panel domains of physical well-being and motor development, social and emotional development, approaches to learning, language development, and cognition and general knowledge. 3.8 is unclear and mixes terms that are not parallel but appear to overlap. 126-28-6. Collaboration and the County Plan. 6.4 is good but could be strengthened with an initial statement that "counties are strongly encouraged to contract with community programs." Also should specify the minimum percentage of funds through formula to be used through contractual agreements. In 6.6 add family child care providers and private early childhood programs. 126-28-8. Personnel Standards: In 8.1 add that teachers should be registered at a particular level on the STARS career pathway. 8.3 is good but should clarify that aides must be registered on the career pathway. Suggest phasing in higher starting level. 126-28-11. Curriculum and Assessment. 11.4.6 is unclear 11.4.11 "complement" rather than "compliment." 11.6 is good to avoid inappropriate emphasis on academics. 126-28-14. Staff Development and Training. 14.3 last sentence is unclear. 126-28-17. Financing. 17.3 Are services to be provided at no cost for the entire day or only for 3 ½ hours? 126-28-18. Health and Safety. 18.9 and 18.10 Work toward a consistent standard for all types of programs, based on best practices. 126-28-19. Program Evaluation. 19.1 CERS was not intended to be a self-assessment, so suggest consulting with authors before using it in this way.	A NA NA NA NA NA NA A A N A N N A	o 2.1.2 o - o private providers already in policy. Not appropriate for FDC due to small # of children o clarified changed + - addressed in revision o o - addressed in revision

11/20/02	Teacher Early Start for Wetzel County Schools Wetzel County Center for Children and Families A Starting Points Center RR 2, Box 107 New Martinsville, WV 26155	126-28-2. Guidelines. 2.1.1 Is this Policy for Pre-K 4 year old students preparing for K? 126-28-3. Definitions. Presently, we have a pre-k-4 yr. Old program in place for the past 10 years. It is operated by Board of Education in Wetzel County. We have a most unique Starting Points Center incorporating FRN, Headstart, East Seals, Even Start, etc. A visit to our Center to see first hand how we operate would give valuable insight in he formulation of this Policy. 3.6 Parent Choice concerning their child is vital to Education. 3.7 Placing a specific Day/amount of hours per day limits greatly the ability to provide scheduling, accomodations and flexibility. 1. Our schedule is 2 consecutive days -- 5 hours per day. 126-28-4. Parent/Guardian Involvement and Family Support. 4.1.5 Preschool Special Needs is also part of our SP Center -- we have these 10 years transitioned those students in to the Pre-K program. 4.1.6 Parental Rights, concerning their child, to make decisions on their education as well as the individuality of all children must be preserved! 126-85-5. Attendance. 5.1 Attendance Policy is Important. 5.2 Parents making decisions about the education of their child must be held responsible for those decisions and make provisions to carry through! 126-28-6. Collaboration and the County Plan. 6.1 It seems to me the Policy is giving County Boards of Education the Responsibility for the Plan but is withholding the necessary venue to carry through with the Plan. 126-28-7. Waivers. 7.1 We are already operating a Pre-K program in collaboration with PSN, Even Start, AmeriCorps, PAT housed in one location. Approximately 145 students serving 02/03. Would not a waiver for us be an option? Waiver for an already Policy approved program! 126-28-8. Personnel Standards. 8.1 The pre-K teachers should hold at time of employment a teaching degree no less than a 4-yyear degree with a specialization in Early Childhood! At Employment, hold a	N A A N N N N N N NA	o see 3.7 o in 2.1.1 - see 3.8 o + + - based on 18-5-44 o waivers are for counties - clarified in revision

		maintain a Education Rich Pre-K environment w/best practices utilized for 4 yr. old learning. 126-28-9. Regulation of Facilities. A visit to Wetzel County Center for Children and Families would show a unique pre-school inner agency relationship. 126-28-10. Standards for Preparing Students. Content standards and objectives for K are quite stringent. Pre-K program should/could be the avenue to prepare for transition to K. 126-28-11. Curriculum and Assessment. 11.1 Allowing only 1 curriculum – limits (cripples) a creative, exemplary educator of young children. 11.6 Excluding Desk re: age appropriate tables/chairs cripples the development of a child's preparation for writing, cutting, etc. and is not supportive of preparing Pre-K for kindergarten! Please eliminate from policy. 12-28-12. Transition and Continuity. 12.1.7 Non duplication of services is crucial to education in the future. 12.1 We have these objectives, in place and operating smoothly in our county. 126-28-13. Inclusive Environments. 13.1 All PSN, Pre-K students are transitioned, included – Welcomed 126-28-14. Staff Development and Training. 14.1 Staff Development is vital to maintaining exemplary educators. However, it must be needs based. 14.2 Desired results may follow WV STARS – but not mandated by this Policy. 126-28-15. Transportation. 15.1 Bus shuttle service is provided for our Pre-K students – parental choice to participate is voluntary. 126-28-16. Program Oversight Responsibility is vague – seems like double set of rules and regulations 126-28-18. Health and Safety. 18.7 Class size/ratios are adequate but not Utopia. 20/2 - adequate 10/2 - Utopia.	N A NA NA N N N N NA N ?	o o addressed in revision - not limited to one curriculum - tables are allowed o o o o STARS establishes core competency requirement o

11/20/02	Martha Hon President /CEO Easter Seals 1305 National Road Wheeling, WV 26003	126-28-1. General. Wonderful vision but will take courage and determination to implement. 126-28-4. Parent/Guardian Involvement and Family Support. Would like family support more defined. 126-28-5. Attendance. Concern about plans to deal with non-attendance and tardiness 126-28-8. Personnel Standards. Concern about enough staff to cover the needs of all organizations involved including West Virginia Birth To Three. 126-28-12. Transition and Continuity. Concern that as much attention is paid to entering the program as exiting the program. 126-28-15. Transportation. If transportation not offered will exclude some children and families from participating. 126-28-17. Financing. Being an unfunded mandate and even if agency collaboration achieved, there will not be funding to implement program that meets needs of all involved.	N A N ? A N N	+ revised o - language added in revision o o

11/20/02	Connie Stout WVAYC President West Virginia Association for the Education of Young Children – Members representing the Governing Board and Executive Committee	On behalf of WVAYC we would like to commend Dr. Cathy Jones and other involved for their leadership in the development of the proposed rule, West Virginia's Access to Pre-Kindergarten System (2525). We would like to express our appreciation for the efforts and preparation. After reviewing the document, WVAYC would like to make the following comments. 126-28-10. Standards for Preparing Students. WVAYC recognizes the importance of a developmentally appropriate curriculum for implementation in the young child's classroom as well as the need for professional accountability through guidelines which may be found in the West Virginia Department of Education content standards and objectives. Our concern is in how the content standards will be implemented in the prek classroom. Please clarify what the expectations of the prek teachers in the implementation and design of curriculum related to content standards would mean. We are also concerned with what the expectations are for young children as well as the relationship of assessments to the content standards. Specify how the results of these assessments would be utilized. WVAYC would like to suggest language that would support standards being implemented and assessed in ways to optimize child development. We feel it is our ethical responsibility to ensure that standards are always used in the best interest of the child. Our organization feels that it is essential to provide opportunities for professional development for teachers and administrators related to learning how to integrate content standards with the focus on developmentally appropriate practices for young children. 126-28-11. Curriculum and Assessment. WVAYC supports the curriculum design in that it is related to developmentally appropriate practices for young children. We would also support the necessity for assessments that are developmentally appropriate. Again, our organization feels that it is essential to provide training opportunities for professional development for both teachers and administrators related to the curriculum and assessment standards as well as the content standards and objectives.	A	o clarified in revision
			N	+

11/20/02	Pamela Blake Area Coordinator Head Start HC 61, Box 11B Wileyville, WV 26186	126-28-1. General. I support this rule because I believe all four year old children should have access to high quality pre-kindergarten programs. 126-28-2. Guidelines. I agree that all Pre-K classrooms should be readiness programs and building blocks for literacy but I think the most important things are to view children within the context of their family, involving families and building on what the child already knows. 126-28-3. Definitions. I believe that "developmentally appropriate" means a curriculum for "early childhood" programming not a watered down kindergarten curriculum. I also agree that the minimum program availability should be at least three consecutive days (preferably four) and at least 3 ½ hrs. per day. 126-28-4. Parent/Guardian Involvement and Family Support. I believe parent involvement to be so important that this section needs to be strengthened to require more from the county in addressing how they work with each family on their goals in Literacy, Parenting, Employment and Wellness. 126-28-5. Attendance. I agreed that there should be an attendance policy. Head Start has to maintain 85% attendance and be fully enrolled at all times. I believe this needs to occur in order to best utilize the funds. 126-28-6. Collaboration and the County Plan. I agree that the collaborative County Plans should include Head Start and Community Child Care Programs and I support that a minimum of 50% of the four year old classrooms be contracted to community programs meeting the standards in this policy. 126-28-8. Personnel Standards. I strongly support sections 8.2 through 8.3 for qualifications and the full-time permit to assure qualifying certification/endorsement of personnel. 126-28-9. Regulation of Facilities. Head Start Performance Standards require Head Start programs to meet the most stringent of regulations for the Safety and Health of enrolled children. The Regulation of facilities requirements of this policy are minimal requirements to meet. I support requiring all programs in a pre-k setting to meet the WVDHHR Child Care Licensing Regulations and enforcing any correctional action plans identified through the DHHR monitoring process.	N	+
			N	+
			N	+
			N	O
			N	+
			N	+
			N	+
			N	+

		126-28-10. Standards for Preparing Students. I agree that the standards for preparing students should align with the Head Start outcomes framework. 126-28-11. Curriculum and Assessment. I strongly agree that the curriculum must be developmentally appropriate and that it is vital to the education success of the child that parents/guardians are encouraged to participate as much as possible. I believe this are needs to remain incorporated into the planning process. 126-28-12. Transition and Continuity. I agree that there needs to be a written transition plan and I think that the Tadpole Agencies that are already doing this should be utilized. 126-28-13. Inclusive Environments. I agree with the inclusive environment policy but am not sure how that would affect Head Start Regulations for servicing low income families. I do agree that all 4 year olds need access to preschool but I think low income and families at risk should have priority. 126-28-14. Staff Development and Training. I would support a county plan to include annual staff development related to high quality programming and agree that it should follow the STARS training process. 126-28-15. Transportation. I believe that for all 4 year olds to have access to a program, transportation must be a mandated service and I believe programs should follow the most stringent requirements for transporting pre-schoolers. 126-28-17. Financing. I believe that state funds should only be provided to counties who have an approved plan (collaboration). 126-28-18. Health and Safety. The Health and Safety areas of this policy are minimal requirements to meet. I believe all programs serving four year olds should meet WV DHHR Child Care Licensing Regulations. 126-28-19. Program Evaluation. I agree that programs should be assessed by a trained outside evaluator but I think every five years is not enough. It think it should be a minimum of every three years to ensure quality programs.	N N N N N N N N NA	+ + + + + + + + - but a very good idea. Lack funding

11/20/02	Nancy Richmond Parent Involvement Coord. Wetzel County Schools Adult Basic Education Coord. RR 2, Box 107 New Martinsville, WV 26155	126-28-2. Guidelines. To ensure the best and most appropriate Pre-K system for our children, the teacher, at minimum, should have a bachelor of arts or science degree which includes early childhood education. 126-28-3. Definitions. If it is less expensive for a county to drop an existing program funded through public education and replace the program with a contracted program, are we jeopardizing the quality of Pre-K education in our county? 126-28-6. Collaboration and the County Plan. By mandating 50% of classrooms for eligible children be provided through community programs, the spirit of collaboration is tarnished in that the process of collaboration should decide how all programs best coordinate, not a preconceived mandate. 126-28-8. Personnel Standards. Because Pre-K student are at a critical point in beginning a lifetime of learning, at the very least, teachers must have a bachelor of arts or science degree which includes early childhood education. Hiring educators with less may save money, but in the long run, our children will be short-changed. 126-28-9. Regulation of Facilities. Since Pre-K education is not child care services, the WV DHHR Child Care Licensing staff should not conduct monitoring visits. 126-28-11. Curriculum and Assessment. "Mimeographed work sheets" may include tracing activities, so we need to be careful about generalizing exclusions. I understand that no student, at any age, should spend time on mindless seat work, so maybe this needs to be reworded. 126-28-18. Health and Safety. The classroom size should be limited to no more than 20 children with the ratio at 1 adult: 10 children. This is a sound idea. And, it is not necessary that more than one adult in the classroom be a certified teacher.	NA N A A NA A N	o o - clarified in 6.4 - clarified in revision - - changed in 11.6 +

		Head Start possesses a very effective Health & Safety Program for our children. Dealing with all aspects of child's health, physical and mental, tracking appropriate screening, ensuring a medical home for our families through our policies and procedures. Information such as this could be valuable in devising a county plan for this program. 126-28-19. Program Evaluation. Head Start has always had an on-going process of evaluating our program. This could be another collaborative effort through all Pre-School agencies reviewing such policies in helping or assisting the BOE in devising a county plan.	N	o	
11/21/02	Bill H. and Kay Carpenter Collaborative Planning (John Stollings dropped off.)	126-28-6. Collaboration and the County Plan 6.5 Core Partnership need to clarify (especially for large counties) Licensed Child Care Center(s) all centers need to be invited as a core partnership—not just one. Representation needs to occur for licensed facilities. 6.5 intent is Licensed facilities not those centers on provisional permits and stay on provisional status. 6.4 50% – Intent is not to dismantle collaborative settings currently in place. Simply because classes in school does not mean to dismantle and put in child care center. 16.2 designee be of someone w/knowledge & expertise in collaborative planning, early care & education. (Page 13) 15.1 Transportation needs to be a coordinated required service NOT a support; otherwise it is not a universal pre-k system. However, careful consideration needs to be given to financial, & safety concerns and ramifications and making the plan feasible.	A N A N NA	o - o o - cost issues	o addressed in 6.5 o clarified in 6.4
11/22/02	Pamela Bishop Wyoming Co. Schools Box 69 Pineville, WV 24874 OR Box 267 Bud, WV 24716	126-28-1. General. I have concerns about 3 year olds being left out, teacher training and personnel requirements, and having programs run on 3 consecutive days. 126-28-8. Personnel Standards. I have a concern that PS Special Needs teachers are not being looked at as qualified to teach the Pre-K program. Look at what we had to do to get our certification. We had to know about "normal" development first before we were trained to know what was not normal. Most of us in this field have been working in it for years. We should not be required to go back to school. We should be grandfathered in on the certification as speech therapists were years ago.	A		- see 8.1

11/22/02	Barbara Myers, President Patricia J. Gracey, Past President West Virginia Head Start Association 51-16th Street, 4th Floor Wheeling, WV 26003	The West Virginia Head Start Association's Board of Directors and members have voted to support Policy 2525 as written. We understand the many hours and extensive work that has been committed to this final piece meeting the requirements of Senate Bill 247. We believe the West Virginia Department of Education and the Department of Health and Human Resources committed to opening lines of communication within the child care industry and with Head Start grantees from the beginning of this endeavor. We want to thank you for including Bill Huebner, WV State Head Start Collaboration Director as well as the President of our Association and various other staff in the discussion and decision making process from the conception of Senate Bill 247 to this final draft of Policy 2525. Our Association recognizes the challenges that lay ahead in implementing this Policy. We are willing to work with both you and Dr. David Stewart to assure the highest quality of early care and education be provided to all the children in West Virginia. The Department of Health and Human Resources staff particularly Kay Tilton, Fred Booth and Paul Nesbaum have been key players in assuring Policy 2525 addresses comprehensive services that insure the health, safety, and well-being of children as well as providing services to meet the many needs of West Virginia families. Our Head Start grantees are committed to working diligently and collaboratively with partners to be part of every county plan. We sincerely appreciate the dedication to children and families of West Virginia that you have demonstrated during the past nine months. The Association members will be available to assist you, Kay Tilton, and Bill Huebner in implementing the program and continuing to assure that only the highest quality of early child care and education with comprehensive services be provided to West Virginia's children and families.	N	2589.6

11/22/02	Frank Devano Administrative Liaison Harrison County Schools 408 EB Saunders Way Clarksburg, WV 26301	126-28-1. General. Applaud the intent to make consistent preschool opportunities available. 126-28-2. Guidelines. Approve the intent to provide developmentally appropriate environments to all children. 126-28-3. Definitions. 3.7 Minimum program availability The length of a day for both WVDE & VWDHHR should be identical. If not, then a 3 ½ hour day is too long for personnel purposes. Teachers may not exceed an 8 hour day. The seven hours of instruction does not allow for lunch, planning and travel time. 126-28-4. Parent/Guardian Involvement and Family Support. 4.1.2 Documented methods of communicating with parent/guardian "which may include." We cannot be required to email parents who are not online. 126-28-6. Attendance. 5.1 The final determination for the child's attendance shall be made by the principal for preschool students, just as it is for kindergarten students. 126-28-6. Collaboration and the County Plan. 6.4 Collaboration and the County Plan The requirement for 50% of the classrooms to be in community settings places an undue burden on school systems. Our system is currently operating 30% of its centers in collaboration with other reliable agencies. Some of these are located within the public schools. Why could these not count toward collaborative efforts in community settings? It would seem the intent is not to encourage collaboration, but to be sure that preschool classrooms are not placed in the public school setting. Both the 50% requirement and the definition of community settings should be changed. It also behooves us to consider those groups who may choose (some for religious reasons) not to be part of the plant. These could account for a significant portion of the population of a county, making it even more difficult to achieve the 50%. 9.1 Regulations of Facilities We have attempted to place one of our collaborations into a childcare facility that has been licensed for several years to a private childcare entity in our community. The site has	see page 15 William N. Ashcroft

		probation. Both the licensing coordinator and the fire marshal have refused to license that same facility to us for our collaboration. Thousands of dollars have been spent by our collaboration on the physical plant: furnace, steps, paint, carpentry and electrical work. The site is still deemed unacceptable for licensure, even provisionally. Since our efforts have only improved the site, it is difficult to understand how improving it according to the directions of the licensing coordinator and fire marshal have failed to make it licensed and usable for our collaboration, but acceptable for a private daycare.		
		10.1 Standards for Preparing Students Does this standard mean that any participating agency must use the adopted curriculum at all times? What would this mean for daycare centers and faith-based groups? How would this be monitored?		
		16.1 Program Oversight We need a more well-defined mechanism or model for monitoring program implementation at all sites for all agencies involved in the plan.		
		17.2 Financing This is another unfunded mandate. Preschool programs are expensive and excellent preschool programs are incredibly expensive.		

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System (WV Pre-k) **COMMENT LOG**

Comment Period Ends November 22, 2002

	11/21	April V. Puzzuoli, Ed.D. Professor of Early Childhood Education Concord College WVAYC PO Box 1000 Athens, WV 24712	
Comments/Suggestions	126-28-1 General		
	126-28-2. Guidelines. 2.1.5 applies to four-year-olds yet 2.1.1 states that three-year-olds mandated under federal law are eligible to participant. 2.1.5 should be expanded to include these three-year-olds. 126-28-3. Definitions. The language that we use conveys a great deal of meaning about what it is that we do. 3.8 means "four-year-old kindergartens", when in actuality kindergartens are for five-year-olds. If we use different terms to refer to children and programs for them, we assist the general public to understand the differences in our expectations for three- and four-year-old versus those for five-year-olds. 126-28-6. Collaboration and the County Plan. Because the guidelines for development of the county plans have not been finalized, the initial plan due date of June 27 does not provide adequate time for communities to participate in collaboration across agencies that is needed for the task before them. The list of recommended members on the county collaborative planning team is very comprehensive. 126-28-8. Personnel Standards. There need to be a statement clarifying that only certified teachers will be able to teach in the public school settings and those working on certification can teach in the community-based programs. 8.1 should include early childhood special education, if the teacher has certification in Early Education as is possible with the Concord College Program. 8.2 a time length, such as 5 years, should be specified for minimum requirements for licensure (end of paragraph). 8.2.2 should, also, include graduates with an interdisciplinary degree if there is specialization in early childhood/child development.	A N NA A A A N	clarified in 2.1.2 o - based on 18-5-44 o clarified in revision o 8.1 o added o not precluded
Action	Type		
N: No Response NA: Not Accepted A: Accepted	- Negative + Positive o Neutral		

11-21	John T. Babyak Harrison County Board of Education Administrative Assistant 408 F. B. Saunders Way PO Box 1370 Clarksburg, WV 26302	126-28-1. General. Applaud the intent to make consistent preschool opportunities available. 126-28-2. Guidelines Approve the intent to provide developmentally appropriate environments to all children. 126-28-3. Definitions. 3.7 Minimum program availability - The length of a day for both WVDE & WVDHHR should be identical. If not, then a 3-1/2 hour day is too long for personnel purposes. Teachers may not exceed an 8 hour day. The seven hours of instruction does not allow for lunch, planning, and travel time. 126-28-4. Parent/Guardian Involvement and Family Support. 4.1.2 Documented methods of communicating with parent/guardian "which may include" We cannot be required to email parents who are not online. 126-28-5. Attendance. 5.1 The final determination for the child's attendance shall be made by the principal for preschool students, just as it is for kindergarten students. 126-28-6. Collaboration and the County Plan. 6.4. Collaboration and the County Plan The requirement for 50% of the classrooms to be in community settings places an undue burden on school systems. Our system is currently operating 30% of its centers in collaboration with other reliable agencies. Some of these are located within the public schools. Why could these not county toward collaborative efforts in community settings? It would seem the intent is not to encourage collaboration, but to be sure that preschool classrooms are not placed in the public school setting. Both the 50% requirement and the definition of community settings should be changed. It also behooves us to consider those groups who may choose (some for religious reasons) not to be part of the plan. These could account for a significant portion of the population of a county, making it even more difficult to achieve the 50%. 9.1 Regulation of Facilities We have attempted to place one of our collaborations into a childcare facility that has been licensed for several years to a private childcare entity in our community. The site has become available to us while the owner is on criminal probation. Both the licensing coordinator and the fire marshal have refused to license that same facility to us for our collaboration. Thousands of dollars have been spent by our collaboration on the physical plant: furnace 126-28-7. Waivers.	see William Ashcraft

	continued	furnace, steps, paint, carpentry and electrical work. The site is still deemed unacceptable for licensure, even provisionally. Since our efforts have only improved the site, it is difficult to understand how improving it according to the directions of the licensing coordinator and fire marshal have failed to make it licensed and usable for our collaboration, but acceptable for a private daycare. 10.1 Standards for Preparing Students Does this standard mean that any participating agency must use the adopted curriculum at all times? What would this mean for daycare centers and faith-based groups? How would this be monitored? 16.1 Program Oversight We need a more well-defined mechanism or model for monitoring program implementation at all sites for all agencies involved in the plan. 17.2 Financing This is another unfunded mandate. Preschool programs are expensive and excellent preschool programs are incredibly expensive.			
11/21	Cher Jolley EACHS Head Start Early Childhood Services Coordinator Head Start Grantee 2 Hyre Avenue Petersburg, WV 26847	126-28-2. Guidelines Item 2.1.6. - Will Pre-K Content Standards be developed? The Head Start Child Outcomes Framework and the WVHSA Child Development Outcomes may be a helpful resource. Item 2.1.11. - For ratios and class size, can daycare, Head Start and Public Preschool regulations all be honored? 126-28-3. Definitions. Item 3.7 - 3+ Consecutive days will provide much more continuity for children. 126-28-4. Parent/Guardian Involvement and Family Support. Item 4.1.2 - Would you also want to include a regular school/home connection such as a weekly checklist to inform parents of child's general well-being? Item 4.1.2 - It's nice to see focus on transition INTO, as well as OUT of program! I think that smooth transitions into the program will set children up for success and will contribute to better attendance.	N N N N	o see 18.1 + o +	

	continued	126-28-11. Curriculum and Assessment. Would it really be necessary to require programs to choose form a list (item 11.1) of approved curriculums? Perhaps if ALL Standards in section 11.4 were met, other curriculums (locally designed or eclectic in nature) could be approved. I think standards set forth in 11.4 are excellent! I like focus on individualizing, self-esteem building and holistic approach. Under 11.4.3d, may want to mention the importance of using teachable moments to facilitate child's learning, and importance of allowing children's interests to drive the topics of study. 11.4.12 - May want to include that programs need to provide a system of support for teaching staff with mentoring and ongoing training...the training is mentioned later in section 14. 126-28-12. Transition and Continuity. 12.1.5 Transition Planning re. Children w/special health needs (IHPs) should also be conducted. 126-28-14. Staff Development and Training. May also want to include a plan of training parents about d.a.p. so they can teach their children most effectively. 126-28-18. Health and Safety. 18.1 - Also make sure no lead base paint was used in building. Water test done. 18.6 - Outdoor area - fenced, with soft zones. 18.8 - Staff serving food should have Food Handler's card.	N N N N	+ o o not precluded o in section 9
11/21	Brenda C. Isaac, R.N. Lead School Nurse Kanawha County Schools 200 Elizabeth Street Charleston, WV 25311	126-28-18. Health and Safety. 18.9 - Immunizations - West Virginia Bureau for Public Health needs to develop specific legislative rules on 4-year-old preschool entry and have those available for all of these programs. These should include time lines for implementation. 18.10 - Health Screenings - The screening mandate is excellent but should have wording on required follow-up to insure that detected problems are corrected. Minimum training for anyone performing screenings should also be included. When facilities are outside of the school systems, there should be mandated guidelines on transition into kindergarten. What safeguards are in place for children with health concerns? Programs operated by county boards should comply with §18-5-22.	N N	o o

	continued	126-28-15. Transportation. It may not be immediately feasible for county systems and private/public agencies, such as Head Start, to implement TransporTots. Additional funding should be made available to enable programs to meet this requirement. 126-28-18. Health and Safety. Many existing Elementary classrooms will not meet the classroom size requirements. The caseload suggestion does not reflect the potential needs of individual children served in an inclusive setting. The maximum caseload should be reduced to allow for implementation of high quality services. This guideline does not reflect the desire for quality. The dental health screening is a great idea. What resources could be tapped to make this a reality? 126-28-19. Program Evaluation. We are concerned that the guidelines limit the tool for evaluation to one provider. Will programs be given a list of resources to use (in addition to ECERS) for on-going evaluation of their plan?	N	O	- addressed in revision
11/22	Joyce Charlton	126.28.3 Definitions 3.7 - Minimum program available means offering each preschool class a minimum of three consecutive days/week for at least three and one half hours per day during the school year calendar.	N	O	
		Head Start Program Performance Standards and Other Regulations, Section 1306 - Page 249-250 3.7 The Standards require that classes must operate for a minimum of three and one-half hours to a maximum of six hours per day with four hours being optimal and that the classes operate a minimum of four days per week. In collaborative partnerships operating days may be negotiated to a minimum of three. I believe that at a minimum four year old Pre-K classrooms should operate three consecutive days a week and for no less than three and one-half hours each day. 126-28-4 Parent/Guardian Involvement and Family Support Page 3 I believe the section of this policy should be strengthened to include: requiring each county plan to address how they will work with each family in the areas of Literacy, Parenting, Employment, and Wellness so that parents/guardians skills can be strengthened as children transition into Kindergarten.	N	+	
			N	O	

	continued	126-28-6 Collaboration and County Plan Page 4 6.4 Head Start and Child Care have developed licensed classrooms set apart from local public school district's Pre-School programs. I support that a minimum of 50% of the four year old classrooms be contracted to community programs meeting the standards in this policy to provide the classroom space, qualified staff and financial resources to the meet the goal. There will be ample opportunities through county plans to bring public school staff and their resources out into the community to support the community classrooms. 126-28-8 Personnel Standards. Page 6 I strongly support sections 8.2 through 8.3 for qualifications and the full-time permit to assure qualifying certification/endorsement of personnel. 126-28-11 Curriculum and Assessment Page 7 I believe it is vital to the educational success of the child that parents/guardians are encouraged to participate in the child's learning experience as much as possible. 126-28-9. Regulations of Facilities and 126-20-18 Health and Safety. Page 7-14 Performance Standards 1304 and 1306 - According to Head Start Performance Standards Head Start programs must meet the most stringent of regulations for the Safety and Health of enrolled children - by meeting State Licensing Regulations or the Head Start Performance Standards at a minimum. The Regulation of Facilities and the Health and Safety areas of this Policy are minimal requirements to meet. I support requiring all programs serving four year children in a pre-k setting to meet the West Virginia Department of Health and Human Resources Child Care Licensing Regulations. I also support OEPA of the State Department of Education in enforcing any correctional action plans identified through the Department of Health and Human Resources monitoring process.	N N N N	+ + + +

11/22	Angela Madia Harrison County Schools PO Box 1370 Clarksburg, WV 26302	126-28-3. Definitions. Minimum Program Availability - For students with an exceptionality the minimum program requirement restricts the IEP committee in providing appropriate services for children based on their individual needs. Specially designed instruction must be based on meeting the student's social, functional, &/or academic needs as specified in their IEP's (Policy 2419). The minimum program availability will restrict the IEP committee's ability to make decisions based on the individual child's needs. It is important to consider the needs of the student and the national environment when determine placement options. For children with special needs a variety of placement options are	A	
	continued	provided through the IEP process; options for children 3-5 range from home as the least restrictive environment to a residential facility as the most restrictive. The minimum limitations will not provide the IEP committee the flexibility to design individual programs for children 3-5 with special Needs. 126-28-6. Collaboration and the County Plan. 6.4 Considered the benchmark of 50% of classroom for eligible children to be extreme. The benchmark should be reflective of the ratio of licensed childcare or Head Start programs within the community. Recommend that Pre-school Special Needs classrooms not be aggregated in the 50% standard. The number of Preschool Special Needs classrooms is determined based upon the needs of students identified by the IEP process. It will be unfortunate if restrictions are placed on their location.	A	
11/20	Alice Jenney Principal Belington Elementary Rt. 2, Box 344 Belington, WV 26250	126-28-3. Definitions Our program is every other day. It would be difficult to schedule our building space any other way. We use Title I money for preschool - is that okay. 126-28-5 Attendance. I have found it difficult to work effectively with Head Start. Our preschool follows school rules and guidelines which are much more rigid than Head Start - our calendars don't even match. 126-28 Our special class of 12 pre school disable children is small and the teacher follows each child's IEP. It meets these children's needs much better than our larger (20 student) pre school class.	N N N	0 - 0

11/20	Lisa Martin Jackson County Schools Director Spec. Education PO Box 770 Ripley, WV 25271	126-28-2 Guidelines. 2.1.6 Pre-K content standards and objectives will need to be developed. 2.1.7 It would appear that this standard (employ staff with strong professional education preparation in child development and early childhood education) is not met by allowing the same permit for 2-year AA degrees (9.2.3) as that granted to PS special needs and elementary education teachers with four year plus degrees. 2.1.11 It is my understanding that the recommended class size is 20 children with one teacher and one paraprofessional/aide. The current caseload for PS Special needs is eight students per session with one teacher and aide. While eligible special needs students are to be included in regular programs under this policy, it would be difficult to manage a student or students with severe delays/disabilities with the higher pupil teacher ratio. Allowable caseloads for special needs students in an inclusive setting would need to be established. 126-28-3 Definitions 3.1 It would be difficult to administer the financial aspect of an educational program supported by funding through outside agencies such as Head Start. Specific guidelines must be provided regarding obligation and expenditure of blended funding. 3.2/3.3 Assurance statements from other agencies or private providers that all requirements of the policy are met in order to be an approved provider are not adequate to ensure either provider qualifications developmentally appropriate curriculum, or appropriate facilities. 3.4 Demographics collected for June 03 plan will be irrelevant regarding the four year old population in 2013-14. It is impossible to project the number of four year old children beyond FY 07.	N N N	O - does not replace 2419
		3.7 Schools should have the flexibility to implement programs within a minimum number of hours per week. Three consecutive days limits the number of students who can be served. We currently implement a PS Special Needs program on a two-day/three-day split. Those students who have two days one semester have three days the next semester and vice versa. We believe that this service delivery model, provided in two or three consecutive days, provides more total service time than three consecutive half days.	A	see 3.8

	continued	126-28-6. Collaboration and the County Plan While I applaud the initiative to provide access to all four year olds who may currently not be receiving services, the requirement of contracting a minimum of 50% to other providers is ludicrous. I agree that collaboration with other agencies is a must; however, providing employment and equitable salaries to unqualified or under qualified providers in an effort to support their programs is a disservice to children and families.	N	2460.1	
11/20	Lee A. Horn - Teacher Paden City Elementary 510 N. 2nd. Ave. Paden City, WV 26159	126-28-1. General The setting of these programs for 4 year olds should be part of public school physical plant and county education philosophy, rules, etc. Head Start and other agencies differ greatly and consistency is vital. Employees teaching should be qualified with 4 year degree in Early Childhood Education. 126-28-3. Definitions. 4 year old program should not mirror 5 year old Kindergarten program. Should be more social than academic.	N N	o o it does not	

11/22	L. Abercrombie RD#3, Box 610 Wellsburg, WV 26037 Brooke High Preschool	126-28-2. Guidelines. There should be a 4 year old program and a different program for eligible 3 year olds. Developmental needs are not the same. How will the class sizes be decided when inclusion of special needs children are incorporated? What if 20 of 20 children need toilet trained? That could happen! 3 ½ hours per day makes it difficult for public schools to incorporate an AM & PM schedule. 126-28-6. Collaboration and the County Plan 50% of the classrooms, what about the other ways collaboration could be implemented? (Transportation, food service, etc. Why the 50% 126-28-8 Personnel Standards. The teachers who already have a preschool special needs degree already had to get a specialization for that. It seems unfair to make them get another one. If a degree is required for special needs, 9 hours of inclusive training will not prepare me to teach special needs children. What is wrong with the existing programs? 126-28-11. Curriculum and Assessment. If we are truly to prepare children for kindergarten, the elimination of using worksheets totally will not help the children. I very rarely use them, but do so occasionally so that the children will be prepared to listen to a teacher directed, whole group, instruction. I do make them fun and incorporate them into our special units. The parents want me to do more of this, not less. Again, I don't use them often, but they help to prepare the children. 126-28-13 Inclusive Environments. Doesn't head start segregate children on the basis of socioeconomic level? Very few children are admitted without meeting the income guideline. What is the percentage? 126-28-15. Transportation Inclusive: We currently have 3 regular ed, preschool classes and a special needs class. We do special units together, parties, programs, and other activities. Our program works. Not all children are ready or capable of being in classrooms of 20 children. 126-28-18 Health and Safety. Again - 20 children are to many when you consider inclusion.	N NA A A N N N N N	o - not realistic o clarified in 6.4 - 8.1. o o

11/22	Kan. County Schools Preschool - Special Needs Teachers and Head Start Teachers Contact - Debbie Brown 348-1353 for add'l info.	Scope 1.1 Scope is extremely broad (3's, 4's, 5's with IEP's and typically developing 4's. Will the curriculum, content standards and assessment be able to consider the needs of all these children. Definitions 3.6 Eligible child definition increases the scope of the program to include 5 year-olds by this definition. This opens a door for young 5's who are too immature to handle the difficult K content standards to flood these programs. Children receiving an additional year should meet eligibility criteria for preschool special needs services. 3.7 Minimum program availability should be addressed in hours or minutes per week (12 hours or 720 minutes); current wording too restrictive. If funds are provided through a variety of sources will pre-K staff/classrooms have to follow the specific regulations of each funding agency? Paperwork needs to be consolidated and simplified to be managed by the classroom teacher. 126-28-5 Attendance Attendance should be a joint commitment from both school and parent rather than responsibility be solely school staff. 126-28-8 Personnel Standards Revisit dual certification issues with special consideration given to teachers with masters in preschool special education and consideration given to experience in classroom with typically developing preschoolers.	N	o	o clarified in 3.7 revised
			A	o 3.8	
			N	o it is see section 5	
			A	o see 8.1	
11/22	Patricia J. Gracey Exec. Director Northern Pandhandle Head Start Inc. 51 16 th Street Wheeling, WV 26003	126-28-1. General I believe the Head Start Performance Standards, developed over 35 years must be the guiding set of standards for WV Pre K since they are the result of extensive research and practice. They did provide Policy 2525 draft if we are to develop a high quality early education and care system for WV children. I support the collaborative structure of the Policy and the check/balance between DOE and DHHR will bring about full utilization of resources both professional and financial. Head Start must be the linchpin of this system since they are the most experienced and have expertise in the field. 126-28-2 Guidelines. I support all guidelines and recommend this adjustment to 2.1.3. provide the building blocks for literacy and social competency. 2.1.11. Establish teacher/child ratios and class size according to accepted research best practices.	N	10.1	

continued	126-28-13. Inclusive Environments. Research is very clear - Inclusion of children with disabilities in these classrooms MUST Be supported by policy and action. Head Start is the leader in the field and they need to be coopted to help in this area. NEW SECTION NEEDED This policy lacks guidance to the county teams as to how families will be recruited and enrolled equitably when there is the issue of under enrollment for Head Start and for Child Care 126-28-14. Staff Development and Training. I accept this section. 126-28-15. Transportation Transportation is not only critical to helping the 46% of families living below the poverty line in WV get their children to the WV Pre K program, but will ensure equal access and equal education for all. We must solve this problem and ensure all have transportation if they need it to attend the program. The policy could be amended later to address isolated families through a different option? 126-28-16. Program Oversight. 16.1 I suggest that this be expanded to include...staff evaluation, discipline, and supervision of the project. It is appropriate for the most experienced organizations to be assigned to a collaborative classroom as well as the other partners. 126.28.17. Financing I strongly support 17.1. The motivation to implement this system collaboratively is tied to the financial resources and we want to take away all incentives to "do it along". 126-28.18. Health and Safety. I strongly support this section. Before all else, we as educators and administrators are commissioned to maintain a safe and healthy environment that protects these most vulnerable preschool children. We have NAEYC, Child Care licensing regulations and other important rules and regulations to follow as we implement preschool education classrooms. If you could strengthen the accountability section for organizations I would be grateful. 126-28-19. Program Evaluation. I support the utilization of ECKERS but this instrument may not be the best to evaluate the management systems and the program's performance fully. Expand this section to include local choice of using an additional instrument like the Head Start PRISM Instrument.	N N N N N N N N N	+ - + o o see 16.1 + + o

11/20	Beth Lowe Elementary Teacher Wetzel County Schools RR 2, Box 107 New Martinsville 26155	126-28-1. General. 3 yr. Olds are not addressed 126-28-2 Guidelines. 2.1.7 staff need to be certified early child teachers. 126-28-3 Definitions. 3.7 Large county school systems need to have flexibility to avoid transportation problems. 126-28-6. Collaboration and the County Plan. 6.4 A mandated percentage of contracted services will ensure failure and negates the spirit of collaboration. 126-28-9. Regulation of Facilities. 9.1 Follow WV Dept. of Ed. facility requirements 126-28-11. Curriculum and Assessments. 11.6 No need for this policy. Developmentally appropriate practices will be used by CERTIFIED teachers. 126-28-15. Transportation. Needs to be more specific 126-28-16. Program Oversight. Need to be more specific	NA NA A A NA NA N N	- see 2.1.2 o see 8 o see 3.8 - see 6.4 o - not necessarily true o o

11/20	Nancy Richmond Parent Involvement Coordinator Wetzel County Schools RR 2, Box 107 New Martinsville 26155	126-28-2. Guidelines. To ensure the best and most appropriate Pre-K system for our children, the teacher, at minimum, should have a bachelor of arts or science degree which includes early childhood education. 126-28-3. Definitions. If it is less expensive for a county to drop an existing program funded through public education and replace the program with a contracted program, are we jeopardizing the quality of Pre-K education in our county? 126-28-6. Collaboration and the County Plan. By mandating 50% of classrooms for eligible children be provided through community programs, the spirit of collaboration is tarnished in that the process of collaboration should decide how all programs best coordinate, not a preconceived mandate. 126-28-8. Personnel Standards. Because Pre-K students are at a critical point in beginning a lifetime of learning, at the very least, teachers must have a bachelor of arts or science degree which includes early childhood education. Hiring educators with less may save money, but in the long run, our children will be short-changed. 126-28-9. Regulation of Facilities. Since Pre-K education is not child care services, the WVDHHR Child Care Licensing staff should not conduct monitoring visits. 126-28-11. Curriculum and Assessment. "Mimeographed work sheets" may include tracing activities, so we need to be careful about generalizing exclusions. I understand that no student, at any age, should spend time on mindless seat work, so maybe this needs to be reworded.	N N	see Pg. 99
	continued	126-28-18. Health and Safety. The classroom size should be limited to no more than 20 children with the ratio at 1 adult: 10 children. This is a sound idea, and, it is not necessary that more than one adult in the classroom be a certified teacher.		

11/20	Pamela Helmandollar Wyoming County Head Start Licensed Practical Nurse Health & Safety Specialist PO Box 1509 Oceana, WV 24870	126-28-2. Guidelines. Head Start has always met the guidelines as far as being a readiness program that meets the needs of eligible children. Our creative curriculum supports how children learn. Family has always been viewed upon as the "child's first teacher" and has been included in all developmental aspects of that child. I feel Head Start can provide an enormous amount of support to the WV Pre-K classrooms just with the knowledge and expertise that we already demonstrate in our program. 126-28-3. Definitions. Under the county collaborative plan 3.4. I do hope that our county's Board of Education will collaborate effectively with our county's Head Start program. Both agencies have so much to offer for this program. And I also hope that Parent/Guardian Involvement & family support remains a critical part of the child's development, such as what head Start now offers families. Head Start has always been a big advocate on training parents, and I do hope this will continue to be initiated in the WV Pre-K program. 126-28-4. Parent/Guardian Involvement and Family Support. See notation above.		see 101

	continued	126-28-6. Collaboration and the County Plan. All pre-school agencies should be involved in developing a county plan with the Board of Education. Each agency has expertise & knowledge that I think is vital in devising an appropriate plan for their county. 126-28-7. Waivers I do not think this applies to Wyoming County. Head Start alone has 13 Head Start Centers located throughout the county. 126-28-8. Personnel Standards. "See notation of Director or Education Specialist" 126-28-14. Staff Development and Training. Head Start has always provided appropriate training to all our staff regarding: - Education - Personnel procedures - Policies - Health training/and as CPR/First Aid/Emergency training. Training is an on-going process with Head Start, this could be a plus for this type of program, using our qualified Employee's for this 126-28-18. Health and Safety. Head Start possesses a very effective Health & Safety Program for our children. Dealing with all aspects of child's health, physical & mental, tracking appropriate screening, ensuring a medical home for our families through our policies & procedures. Information such as this could be valuable in devising a county plan for this program. 126-28-19. Program Evaluation. Head Start has always had an on-going process of evaluating our program. This could be another collaborative effort through all Pre School agencies reviewing such policies in helping or assisting the BOE in devising a county plan.		

11/20	Collaborative Planning Committee: PIECES Bill H. Kay Carpenter	126-28-6. Collaboration and the County Plan 6.5 Core Partnership need to clarify (especially for large counties) Licensed Child Care Center(s) all centers need to be invited as a core partnership - not just one. Representation needs to occur for licensed facilities. 6.5 intent is Licensed Facilities not those centers on provisional permits and stay on provisional status. 6.4 50% - Intent is not to dismantle collaborative settings currently in place, simply because classes in school does not mean to dismantle & put in child care center. 16.2 designee be of someone w/ knowledge & expertise in collaborative planning, early care & education (Page 13) 15.1 Transportation needs to be a <u>coordinated</u> required service not a support; otherwise it is not a universal preK system. However, careful consideration needs to be given to financial & safety concerns. And ramifications and making the plan feasible.		see previous comments - P
11/22	Pamela Bishop Wyoming County Schools Box 69 Pineville WV 24874 OR Box 267 Bud, WV 24716	126-28-1. General. I have concerns about 3 year olds being left out, teacher training and personnel requirements, and having programs run on 3 consecutive days. 126-28-8. Personnel Standards. I have a concern that PS Special Needs teachers are not being looked at as qualified to teach the PreK program. Look at what we had to do to get our certification. We had to know about "normal" development first before we were trained to know what was not normal. Most of us in this field have been working in it for years. We should not be required to go back to school. We should be grandfathered in on the certification as speech therapy were years ago.	A	see 8.1
11/22	Ruth Ann Ponzurick	Cathy, First of all I would like to thank you & Kay Tilton for the many opportunities that have been provided for the Head Start Programs to participate on committees and/or be part of avenues to keep communication available of the evolving Policy 2525. Comments on Policy 2525: I concur with the sections as written with the exception of additional comments as follows: 126-28-6 Collaboration and the County Plan Page 4. 6.4 I strongly support that a minimum of 50% of the four year old classrooms be contracted to community programs meeting	N	230.4

	continued	the standards in this policy to provide the classroom space, qualified staff and financial resources unless the county collaborative team can document otherwise supported and written permission both to the Department of Education and the Secretary of the WV Dept. of Health and Human Resources to approve this request. 126-28-9 Regulation of Facilities Page 7. 9.1 I support requiring all programs serving four year children in a pre-k setting to meet the WV Department of Health and Human Resources Child Care Licensing Regulations. I also support OEPA of the State Department of Education in enforcing any correctional action plans identified through the DHHR monitoring process. I think we need to know what this means. How much "teeth" is in this???? or I'm not sure who would be responsibility for this, but should the law be changed to "equalize" the playing field with BOE & no longer be exempt for this licensing requirement. 126-28-13 Inclusive Environments Page 12. 13.1-13.2 I'm concerned that many of the school systems are lag in providing inclusive classrooms & this could provide an additional challenge with collaborations. 126-28-15 Transportation Page 13. 15.1-15.3 I <i>strongly</i> feel that if the BOE is mandated to provide a universal pre-k program, that they should be responsible to provide this service. I do not believe it specifically identifies in Policy 2525 that additional compensation by a BOE would be paid to Teachers that would be hired by another agency. This could become a Human Resource nightmare especially for Community Action Programs that operate multiple counties. For example, we would have Teachers being paid different salaries per county. Then, if the teacher receives additional monies, what about the Food Service, Teacher Aide, Bus Drive etc. that feels they should be paid at the BOE rate? I would suspect that this could cause grievances/lawsuits within the BOE when they contract with another agency while having their Teachers on a RIF list or those that feel they are equally qualified for the job? I'm not sure that you have an answer for this, but to raise awareness of how the community partner may be struggling to handle.	N N N	+ - -

	continued	Thank you for your consideration on my comments. Respectfully submitted, Ruth Ann Ponzurick Children Services Director		

	continued	126-28-15. Transportation. 15.1 Transportation should be mandatory for universal pre-K programs. If transportation is not provided the number of children that will be able to participate will be limited. 126-28.16. Program Oversight. No Comment 126-28-17. Financing. No Comment 126-28-18. Health and Safety. No Comment 126-28-19. Program Evaluation. No Comment	NA N N N N	- 0 0 0 0

11/22	Dr. Richard Butler Superintendent Ritchie County Schools 134 South Penn. Avenue Harrisville, WV 26362	126-28-1. General In general, I'm not sure that policy writers were aware of the many counties that are already meeting or exceeding the opportunities for Pre-K students sought in this policy. Braxton, Gilmer, Calhoun, Ritchie and many others already have quality programs in place, either primarily within the school system or in collaboration with community providers. Some components of 2525 will cause unnecessary upheavals in those programs and <u>will not</u> result in improved programming for 4-year olds in many of those counties. Please Charleston, for this policy and future policies - just do the following - TELL US WHAT THE EXPECTATIONS ARE, HOLD US ACCOUNTABLE FOR MEETING THE EXPECTATIONS, THEN DEAL WITH THOSE SYSTEMS WHO DON'T. Please refrain from the futility of trying to prepare a state "how to" model that will fit all 55 diverse counties - You can't do it and you especially can't do it when you're not aware of how current programs are working in the 55 counties, and you get no input from the counties, as is the case with policy 2525. At the very least, I would encourage the State Board to delay the requirement of a completed county plan until some answers can be developed to critical questions posed by public school and community-based early childhood educators across our state. 126-28-3. Definitions. 3.7. <i>Minimum program availability</i> means offering each preschool class a minimum of three consecutive days/week for at least three and one half hours per day during the school year calendar. This requirement unnecessarily restricts logistical and transportation options for rural counties. The argument that non-consecutive days create multiple "Monday effects" has some merit, but no more than saying the resultant four-day weekends created by "three consecutive days" will create "summer drop-off" every week. Tell us the minimum number of hours per week - we need the flexibility. 126-28-6. Collaboration and the County Plan. Maximize existing resources and collaborate with other providers of early childhood education Yes, we should. No less than 50% of the classrooms for eligible children must be provided through contracts with community programs, including but not limited to Head Start and child care	NA	based on 18-5-44
			A	see 3.8
			N	+

	continued	Maybe not that bad an idea for those counties like Kanawha or Wood that have a long way to go in offering quality opportunities to 4-year olds. But what about the counties that 90% + are already getting 2525 level services. Please endure this example: Gilmer County has serviced virtually all county 4-year olds for several years, four days per week in quality programs. What if now the local church wants to be one of the 50% classrooms - it has the new beautiful facility - it can meet all 2525 regs - and it wants to have access to the kids for both state approved curriculum and religious instruction. Will the GCBOE be forced to collaborate with this new partner to transfer a quality service it already provides to this new community provider and flow the money (Note there are no additional dollars in this scenario because there are no additional kids) to the church? I believe 2525 says that GCBOE has no choice. This is not totally a "what if". I know Gilmer's program and I belong to the church that just might be interested. 126-28-8. Personnel Standards. This section might be referred to as the "lawyers full employment act". Questions regarding, permitting, displacement, seniority, hiring, evaluation, etc. were rampant at our RESA V meeting regarding 2525. Although there were questions aplenty - there were no answers. 126-28-11. Curriculum and Assessment. 11.1. Only curricula and curriculum enhancements that are included on the list of accepted curricula and curriculum enhancements may be used by programs participating in the county plan. How many church providers will be willing to accept all the additional state requirements of 2525 and then allow "only" state curricula? Not many I believe. 126-28-12. Transition and Continuity. 12.1.7. To the extent possible, programs will be signed to minimize the number of settings in which a child receives education and care services. Yes - Okay. 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. Yes - they should. Placement shall not be limited to the local school district in which the child lives if openings are available in participating programs	A	clarified in 6.4
			N	O
			N	O
			N	+
			N	+

	continued	Whoa - we shall not limit their choices? - as determined by who? There is no guaranteed school choice in grade K-12 in WV yet we work with parents and generally do quite well. Maybe the Pre-K group is a tougher group. Seriously, there are some real negative possibilities inherent in this phrase. If the school system has a program in town A with 19 kids in it and a program in town B with 11 kids in it - a parent from town B can unilaterally move their child from program B to program A (there is one slot left), simply because grandma can pick up the child after school on the way home from therapy? Enough said. 126-28-13. Inclusive Environments. 13.2. County plans will not develop classrooms that segregate on the basis of socioeconomic level, ability, and/or funding streams. What does this mean? No more stand alone Headstart Programs (participation is based on socioeconomic status)? Can the county board not have any stand alone school-based classrooms (funding stream)? 126-28-14. Staff Development and Training. 14.3. Every early education teacher and aide must complete a total of 45 hours of training based upon the curriculum/assessment standards over a 24 month period and provided by the employer or made accessible through the county collaborative plan for professional development. These 45 hours of training will satisfy the 18 hours annual training requirement for the year in which the training is received and the two subsequent years Newly Employed? As of when? Some yet to be determined beginning date? So in this three year period of time Pre-K people are required 45 hours but everyone else is required 54 hours. Are Pre-K people excepted from other required CE? What happens if trained employee leaves the system, etc. etc. Strike this whole confusing unneeded paragraph. 126-28-18. Health and Safety. 18.6 WV Pre-k classrooms shall provide useable floor space of at least 35 square feet per child and available for children's activities, exclusive of halls, bathrooms, the kitchen, office space, or storage areas. Useable outdoor play space of 75 square feet per child shall be provided. Used as an example - this requirement, along with several others in the personnel and curriculum sections will virtually guarantee the loss of number of good community partners across our state.	N A A N	- or o clarified in 3.3 clarified in revision o/-

	continued	In one section of Policy 2525 we mandate 50% participation and other sections we throw up roadblocks for community partners to remain involved.	A	6.4 allow county variance

11/22	Mark E. Colaw Executive Director EACHS Head Start 2 Hyre Ave. Petersburg, WV 26847	126-28-1 General. 2.1.1 - I would like to see children that are three years old that are eligible for Head Start be included in the eligibility criteria. We have included children that are eligible for 2419 services because they have special needs. Numerous studies have been done that show children that live in poverty have less opportunities and are more developmentally delayed than other children with different economic backgrounds. There are also some rural areas that will not have enough 4 year old children to make up the classroom numbers needed to collaborate with Head Start programs. In these communities both the four and three year old's may not have access to services provided under 2525. As far as all the other standards in this area, they should be maintained in the final draft of the policy. 126-28-4 Parent/Guardian Involvement and Family Support In general, I would like to see the final draft include all the existing standards. A strong parent involvement component can only enhance the opportunities for children to learn and grow. Although I would like to see a formal structure that allows parent participation in decision making, this is a good start and hopefully the role of parents in program planning and decision making can be expanded in the future. 126-28-6 Collaboration and the County Plan I think this is the most critical section of the policy and will also be the most difficult to implement. However, without collaboration there's no way we will be able to effectively streamline services and maximize resources. It's my hope that nothing will be removed from this section especially the 50% rule. 126-28-8 Personnel Standards In order to support the integration of early childhood education and care programs, we will need to initially have a system that recognizes various levels of staff qualification requirements. The standards for personnel included in Policy 2525 are inclusive and recognizes early childhood certification at various levels. In addition to providing flexibility that will be needed to get these programs started under collaborative models, this system will establishes a process that is unified for the future. My hope is that nothing will be removed from this section.	N	N	o 18-5-44 issue
			N	+	
			N	+	
			N	+	

	continued	126-28-9 Facilities I support the standards included in this section and would encourage that the existing requirements be maintained. I would prefer to see a limit of at least 20 children per classroom setting. 126-28-10 Standards for Preparing Students Although I support the adherence to the Head Start Outcomes Framework, it's my suggestion that the Department of Education develop new standards for learning for children that are pre-school age. These standards should recognize that children learn and grow at different rates and be developmentally appropriate. 126-28-11 Curriculum and Assessment I support the existing standards and would encourage that they be maintained in the final draft of the policy. However, I also think that it would be beneficial to allow counties to be able to submit locally designed curriculum's and assessments for consideration and use within that county. The current policy doesn't allow this. 126-28-15 Transportation Although I personally believe that if counties provide transportation services more children will participate in this program. In the event that they do provide transportation, it would be provided in compliance with WV transportation regulations as well as federal standards.	N N N N	+ + +/- o
11/18	Ann Nutt DHHR	PIECES Quality Initiatives and Curriculum Committee 126-28-10 Strengthen the language to insure appropriate intent and use of CSO for Pre-k is clear. Information such as, "The CSO document is not intended to become a checklist for making decisions regarding children's readiness to move to kindergarten. Children should be assessed on a continuum, noting where they began and where they were able to progress." If the expectation exists that the assessment process used in classrooms specifically measure the progress on the CSO direction and comment regarding that should be made. This would have implications on what about assessment in a comprehensive curriculum is reviewed and what assessment tools would be selected as appropriate (see next section) so clear expectation may be useful.	A	see revision section 10

	continued	126-28-11 11.1 Consider establishing in policy a transitional time frame for developing an approved list of curricula and to allow counties time to select curricula. Suggest that for the 2003-2004 school year counties with classrooms in operation use curriculum standards in the policy as a guide, as well as curricula on the Educare Approved Curricula List. Possibly then counties should have selected an approved curricula by the 2004-2005 school year and have identified a training process for staff to learn to implement the curricula. In 11.2 it is noted that assessment processes are to be approved using the WV Department of Education process. If there will be an approval process, an expectation of use of only approved tools should be stated. A clearer definition of approved enhancements may be useful or consider a suggested list of enhancements with the expectation (stated in the policy) that any enhancements used "fit" and serve to support the comprehensive curriculum and that the curriculum standards are followed appropriately. For example, an enhancement that uses centers but scripts what children must do in the centers is not enhancing an appropriate curriculum. But a resource book describing current literacy research and ways to implement it appropriately would. 11.2 Suggest changing "assessment processes" to assessment tools. Consider the implications and logistics of curriculum enhancements using the full Department of Education process. Potentially a recommended list could be developed. The sheer numbers of supplemental materials available makes this a difficult task. The definition of enhancement may be critical. It might be useful to add language that enhancements must support the philosophy and methods of the comprehensive curriculum, and not supplant or replace them. Consider the implications and logistics of full process for assessment tools. If tools must assess progress on all CSO the currently available published tools may not totally correlate.	A N A	addressed in revised policy 11.1 see 11.4

	continued	126-28-19 Program Evaluation 19.1 Suggest adding language that indicates that a teacher should not self-assess their own classroom on the ECERS. The county plan should include a joint process for evaluation of some nature.	NA	- based on decision of steering team

11/20	Jane Lynch Federal Programs Director Calhoun County Schools RR 1, Box 1E Grantsville, WV 26147	126-28-3 Definitions 3.7 Program availability is defined as a minimum of 3 consecutive days/week for at least 3 ½ hours. This will be drastic change to the program our county currently provides, nor do I believe it is the best use of dollars. We currently offer full day programs, with a combination of days per week, depending on the child's needs and ages. Students currently attend from 660 to 1330 minutes per week. Our parents prefer their children to attend full days. This allows children to participate in special events, trips, and activities that are offered at each school. Due to the areas our school buses currently travel, it would not be time effective to use any mode of transportation that is currently used by Head Start. Our county could not afford to add a midday run for only preschool children. Suggestion – look at minutes per week, rather than consecutive half days proposed policy guidelines. 126-28-6. Collaboration and the County Plan. I have issue with 6.2, in that the county plans will be approved by the DHHR. As a local administrator, I have found and history supports that a “man cannot have two masters”. Throughout this policy, the lines of responsibility are cloudy. We, as a county, have been working collaboratively with all available agencies, for the education of our children. We do at times meet resistance with other agencies, but we continue to work on that relationship. Without clear direction and definition of who answers to whom, the current outline of reporting to two agencies does not properly address the spirit of collaboration. 6.4 in which “no less than 50% of classrooms..provided through community programs”. This would tie the hands of providing a quality education program for all four-year olds. Our county has offered services to all students, whether they are currently in the county preschool/preschool handicapped program. Currently we have 4 preschool and/or preschool handicapped classrooms. We have collaborated with Head Start. The State should research existing programs prior to the development of this policy. We established our program over 10 years ago, and keep adapting it to meet the needs of our families. Changing our program to meet the regulations in the policy will be regressive to our program. 126-28-8. Personnel Standards The guidelines set forth in this section are the most disturbing of the entire policy. Our state has set for high standards for the education of children. <u>No Child Left Behind</u> repeatedly	A	see 3.8
			NA	based on 18-5-44
			A	see 6.4 revised

	continued	uses the term, "highly qualified teachers" which this policy in no way supports. This proposal will allow persons with an associate degree and one year of experience to be permitted to become a certified preschool teacher. Our current teachers certainly exceed this benchmark. For any school system to be forced to accept teachers on permit, with less training than our paraprofessionals is ludicrous. We have the range of paraprofessionals with Masters Degree through Associate Degrees. They currently hold a paraprofessional certification and have been working as paraprofessionals in early childhood classrooms for several years. Compare this to the degree level of Head Start and Private Day care "teachers". Local resources of certified teachers in early learning centers outside schools, is non existent. 126-28-9. Regulation of Facilities. Again, under this portion of the policy, public schools are to be held accountable for the implementation, but DHHR Licensing staff will monitor, then report to the OEPA. 126-28-12. Transition and Continuity. 14.3 states that every early education teacher and aide must complete 45 hours of training over a 24 month period. It also states that these 45 hours of training will satisfy the 18 hour annual training, plus 2 years. It appears the intent of this regulation is to provide under qualified permitted "teachers" the opportunity to take classes without the expectation to attend training with their peers. Of any staff members who would need training, the ones on permit need it the most. The state of WV currently requires all personnel to receive 18 hours per year of approved continuing education. Particularly with new employees or permitted teachers, this is counter productive. Our systems have problem now finding the time to deliver quality staff development. We also have difficulty providing substitutes to cover classes for teachers to attend training and now the requirement that all early education teachers and aides attend 45 hours per 24 months would be inconsistent if not impossible. Nor would it be advisable for the children to have both their teacher and aide away from the class at the same time. The students need to feel that safety and consistency in their programs. 126-28-17. Financing. The collaborative plan is to explain how the monies generated from the program will be used to support programs in the county. Where will the monies come from to fully implement services,	NA	2525 sets minimum standards
		126-28-12. Transition and Continuity. 14.3 states that every early education teacher and aide must complete 45 hours of training over a 24 month period. It also states that these 45 hours of training will satisfy the 18 hour annual training, plus 2 years. It appears the intent of this regulation is to provide under qualified permitted "teachers" the opportunity to take classes without the expectation to attend training with their peers. Of any staff members who would need training, the ones on permit need it the most. The state of WV currently requires all personnel to receive 18 hours per year of approved continuing education. Particularly with new employees or permitted teachers, this is counter productive. Our systems have problem now finding the time to deliver quality staff development. We also have difficulty providing substitutes to cover classes for teachers to attend training and now the requirement that all early education teachers and aides attend 45 hours per 24 months would be inconsistent if not impossible. Nor would it be advisable for the children to have both their teacher and aide away from the class at the same time. The students need to feel that safety and consistency in their programs. 126-28-17. Financing. The collaborative plan is to explain how the monies generated from the program will be used to support programs in the county. Where will the monies come from to fully implement services,	N	- aligned & revised 14
			N	- legislative issue models in Mon 7 Taylor's

	continued	if they are not generated through the changes in this program? There do not seem to be other funds designated other than current funding sources. Starting or changing programs can be expensive. 126-28-19. Program Evaluation. 19.1 designates the use of an ECERS assessment. An evaluator will evaluate the program. It needs to be clear that this cost will not be forwarded to the counties.	N	o

11/14	Janice Barnett Education Supervisor Northern Panhandle Head Start Wheeling, WV	I believe that Policy 2525 will be an excellent collaboration with all parties having a major role in the success of 4 year old preschool in our state. I support Policy 2525 and I would like to add the following comments: 1. 126-28-3 Definitions Page 3 3.7 I agree that the preschool class should be a minimum of 3 consecutive days/week for at least 3 ½ hours per day. I strongly urge that the preschool program should be 4 consecutive days/week for at least 3 ½ hours per day during the school year calendar. I have been an educator for early child care for 20 years and I have taught in several different models. I have found the 4 day model to be the most successful for the children. 2. 126-28-4 Parent/Guardian Involvement and Family Support. Page 3 I strongly support requiring each county plan to address how they will work with the family. It is imperative that we have strong family relationships. I am hopeful that if we build the bond with the family in the new pre-school plan it can continue to grow throughout the elementary school years. I recommend the Parent Literacy Program where we provide a program that will enable all parents to achieve literacy. I think that teachers should make home visits per year, one at the beginning of the school year to meet the family in the comfort of their home, and one at the end of the year to discuss child's successes in pre-school and to provide necessary information that will help the child transition into Kindergarten. I recommend 2 Parent/Teacher Conferences in the classroom so that the families can see the child's classroom environment and discuss what happens in the child's school day. I also recommend Family Activity Nights where all of the families can join together for an evening of fun. I recommend Parenting Classes to enable the families to meet the growing needs of the children and families. 3. 126-28-6 Collaboration and County Plan Page 4 I strongly support 50% of the classrooms for eligible children be provided through contracts with community programs. I believe that it is essential to collaborate to meet the needs of all families, whether it be a child care setting, Head Start center, or public school setting. I believe that all programs should meet state licensing standards, Head Start Performance Standards,	N	+
			N	+
			N	+

	continued	low student/teacher ratio, and highly qualified, developmentally appropriate staff. 4. 126-28-8 Personnel Standards Page 6 I support sections 8.2 and 8.3 for qualifications and the full-time permit to assure qualifying certification endorsement of personnel. It is essential that the teachers in the pre-school program be qualified in early child development. 5. 126-28-11 Curriculum and Assessment Page 7 It is essential that we have a committee of public school staff, Head Start staff, and child care staff, and parent committee to choose a developmentally appropriate to enable the child to success. We must follow NAEYC and EBERS guidelines for the highest quality program which will be rich in whole child curriculum, emerging skills, pre literacy skills, continuum of development, readiness program, transition, and character curriculum. 6. 126-28-9 Regulation of Facilities and 126-20-18 Health and Safety Page 7 - 9.1 I strongly agree that all preschool classrooms must meet WV Division of Health Legislative Rules Child Care Centers 64CSR21. 18.7 - WV Pre-k classrooms shall limit classrooms to 20 children, preferably 18 children. Ratios shall be maintained at 1 adult: 10 children with 1 adult being a certified teacher. A classroom aide will be provided for children with special needs. Performance Standards 1304 and 1306 - We must maintain the most stringent of regulations for the Safety and Health of Enrolled children by meeting State Licensing Regulations or the Head Start Performance Standards at a minimum. I strongly urge requiring all programs serving 4 year old children in a pre-k setting to meet the West Virginia Department of Health and Human Resources Child Care Licensing Regulations. I also support the OEPA of the State Dept. of Ed in enforcing any correctional action plans identified through the Department of Health and Human Resources monitoring process. I truly believe that if each group works together as a team and bring the best of all groups into the structure, we will have the best 4 year old program. However, we must come together with our goal being what is best for children and families with total support for each group. I believe in the policy and I will work in any capacity to make it work.	N N A + + +

11/20 Elmore, Nancy (ACF) [nelmore@acf.hhs.gov] David Lett, Regional Administrator for Health and Human Services, Philadelphia, PA	<u>126-28-4. Parent/Guardian Involvement and Family Support.</u> 4.1 – We wholeheartedly concur with the importance of the involvement of parents in the education of their children, as reflected in this section. To further underscore the value of parent involvement in preschool programs, you may wish to add language to this section that encourages pre-kindergarten programs to welcome parent involvement in the classroom. Such language might parallel the Head Start performance standards, which require that classrooms be open to parents during program hours. Parents must be welcomed as visitors and encouraged to observe children in the classroom and to participate with children in group activities. 126-28-6. Collaboration and the County Plan. 6.4 – We applaud the effort to maximize existing resources by requiring that 50% of the pre-kindergarten classrooms be served through contracts with community providers. This provision will encourage valuable partnerships between local school systems, Head Start, and child care – building upon the strengths and unique features each has to contribute. It will also ensure that new programs are not created where there is already a qualified provider in the community, eliminating the potential for duplication of services and competition for slots. For the same reasons, we also support the requirement that a portion of the funds generated by the formula be used through the contractual agreements to support compliance with this policy. <u>126-28-7. Waivers.</u> 7.2 – We recommend that county requests for waivers contain the written concurrence of the core community partners who would normally make up the local planning team. <u>126-28-8. Personnel Standards.</u> 8.1& 8.2 – We support the mandate that teachers of preschool children be certified in early childhood education or closely related fields, such as preschool special needs. The research clearly demonstrates that it is not effective to teach four year-olds in the same manner as older aged children.	See Pg. 82

	continued	Research shows that a "push-down" to pre-kindergarten of methods and materials used in elementary school or middle school is inappropriate for preschool children, and can actually be harmful to them. The challenge for preschool teachers is to develop classroom activities that teach while engaging and developing children's interests. This provision would prohibit the transfer of displaced teachers from higher grades to preschool classrooms without first obtaining the credentials necessary to teach four year olds. We urge you to retain this provision in the final policy. 8.2 – The provision of full time permits for experienced early childhood educators who do not hold one of the three qualifying degrees cited in section 8.1 is critical to the success of this initiative. This is the vehicle that will enable community providers to collaborate successfully with local school systems in making universal pre-kindergarten a reality. This provision underscores the relationship between teacher qualifications and classroom quality, while at the same time providing a window of opportunity that enables experienced, high performing teachers in community programs such as Head Start and child care to proceed along a continuum of professional development toward a qualifying certification. We urge you to retain this provision in the final policy. <u>126-28-9. Regulation of Facilities.</u> 9.1 – We support the requirement that all programs serving preschool children meet West Virginia licensing standards, and encourage you to retain this provision in the final rule. <u>126-28-11. Curriculum and Assessment.</u> 11.1 through 11.6 – We fully support this "whole child" approach to curriculum and assessment. These research based standards recognize the cognitive, physical, social, emotional and health needs of preschool children. The level of detail provided in this section lays the groundwork for quality pre-kindergarten programs that support school section lays the groundwork for quality pre-kindergarten programs that support school readiness across a broad spectrum of providers, and safeguards against the "push-down" of elementary school methods and materials in teaching pre-k children. We highly recommend the retention of this entire section in the final policy.

	continued	<u>126-20-18. Health and Safety</u> 18.7 – We strongly concur with the limitation on classroom size to twenty children, and with the 1:10 ratio of adults to children. The benefits of these standards reach well beyond the important and obvious health and safety considerations. Research has shown that small classrooms and adequate teacher/child ratios are critical to the quality and success of early childhood education programs. Furthermore, these standards will facilitate Head Start's ability to partner with local school systems, since the standards are consistent with Head Start requirements that set the average class size at seventeen to twenty, with no more than twenty children per classroom. Similarly, the 1:10 teacher/child ratio will also facilitate Head Start's ability to serve as a community program, since Head Start classes must be staffed with two adults – a teacher and an aid or two teachers and, whenever possible, a volunteer. Any increase in the class size or teacher/child ratios proposed in this policy would pose a barrier to Head Start's participation in the universal pre-kindergarten system. Let me close by expressing my sincere thanks to you and your colleagues for your fine work in laying the foundation for universal access to pre-kindergarten in West Virginia. I appreciate the opportunity to comment in support of this groundbreaking policy that offers great promise to West Virginia's young children. Cordially, David J. Lett Regional Administrator			
11/20	Ray Price, Professor and Coach	POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System I agree with section 6.4.6.4. In order to support counties in the effort to maximize existing resources and collaborate with other providers of early childhood education, no less than 50% of the classrooms for eligible children			This comment copies large sections of policy & then says I agree.

	continued	must be provided through contracts 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 or cannot meet the mandates of this policy. 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 community settings. This ratio of community to public school providers can only be decreased with the written permission of both the West Virginia Board of Education and the Secretary of the West Virginia Department of Health and Human Resources. 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. 126-28-4 Parent/Guardian Involvement and Family Support believe that each family must have a pre-enrollment home visit by the preschool teacher and assistant in addition to two parent-teacher conferences..I agree with 126-28-8, 8.1,8.2,8.21,8.2.2,8.2.3,8.3§126-28-8. Personnel Standards.8.1. Teachers must hold a qualifying certification/endorsement for teachers, specifically, early education, Pre-k-k endorsement, or birth to five.8.2. A full time permit shall be issued and valid for one school year and shall expire on the thirtieth day of June. 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 126CSR136, West Virginia Board of Education Policy 5202 - Minimum Requirements for the Licensure of Professional/Paraprofessional Personnel and Advanced Salary Classification, Section 15. Full time permits will be issued for:8.2.1. persons with degrees in preschool special needs, elementary education, child and family studies with an emphasis on early childhood education, or child development,or8.2.2. persons with a Board of Regents degree with a specialization in early childhood/child development,	

	continued	or 8.2.3. persons with an AA in child development/early childhood or occupational development with an emphasis on child development/early childhood and one year of early education teaching experience. 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 West Virginia State Registry and Training System (WV STARS) 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 0-1 years of experience and possess the ability to understand and practice the core competencies with direction and instruction or through sponsorship of a professional organization or qualified mentor (attached). Aides and assistants must have an individualized staff development plan for specifying his/her planned progression on the career pathway toward level V. I agree that 9.1 should remain as it is. 9.1. All approved participating WV Pre-k programs, see definitions, that are included in the county collaborative plan must meet the requirements as set forth in the West Virginia Division of Health Legislative Rules Child Care Centers 64CSR21 or any rule promulgated to replace and/or update 64CSR21. Public schools or other programs who are exempt under West Virginia Division of Health Legislative Rules Child Care Centers 64CSR21 or its replacement must meet the requirements set forth in that rule. In the case of public schools, West Virginia Department of Health and Human Resources Child Care Licensing staff will conduct monitoring visits and any recommendations for action will be made to the Office of Education Performance Audits. I agree with 126-28-10, 10.1 §126-28-10. Standards for Preparing Students. 10.1. Programs participating in the county's collaborative plan must adhere to the West Virginia Department of Education content standards and objectives for eligible children's programs which are aligned with the Head Start outcomes framework and kindergarten content standards and objectives. The content standards and objectives for programs serving eligible children are written to reflect a level of performance that supports successful transition into kindergarten. I agree with 126-28-11 (11.1-11.6) §126-28-11. Curriculum and Assessment. 11.1. Only curricula and curriculum enhancements that are included on the list of accepted curricula and curriculum enhancements may be used by programs participating in the county plan.	

	continued	11.2. Curricula, curriculum enhancements and assessment processes will be approved following the process established by the West Virginia Department of Education, including, preschool special education, for adoption of instructional materials.11.3. Curriculum and assessment, along with the content standards and objectives, will be parts of an inter-related system that measures the child's progress on a continuum of development and are utilized to individualize the children's educational opportunities.11.4. Curricula 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:a. meeting the content standards and objectives for eligible children as prescribed by the West Virginia Board of Education.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.	

	continued	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, 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.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	

	continued	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 compliment to, not substitute for, effective teaching or good curriculum. 11.4.12. include an assessment process 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 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 activityh. art,i. music.11.6. Classroom design and program implementation for eligible children must exclude the use of desks, mimeographed 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.l agree with 126-28-14 (14.1 through 14.3)§126-28-14. Staff Development and Training.14.1. Each county plan will include a plan for providing a minimum of 18 hours annually for staff development related to high quality programming for eligible children based on a professional development needs assessment and including a minimum of six hours of education on inclusive environments.14.2. Professional development opportunities will follow the West Virginia State Training and Registry System (S.T.A.R.S.) training process (attached).		

	continued	14.3. Every early education teacher and aide must complete a total of 45 hours of training based upon the curriculum/assessment standards over a 24 month period and provided by the employer or made accessible through the county collaborative plan for professional development. These 45 hours of training will satisfy the 18 hours annual training requirement for the year in which the training is received and the two subsequent years. I agree with 126-28-15 (15.1 through 15.3) §126-28-15. Transportation. 15.1. For programs participating in the county collaborative plan, transportation is considered a support, not a mandated service. 15.2. Participating programs should coordinate transportation systems to support families whose children would not otherwise be able to participate. 15.3. All participating programs must, at a minimum, follow the requirements of their primary funding source or the West Virginia Transportation document whichever is more stringent. I agree with all 126-28-16 §126-28-16. Program Oversight. 16.1. Local program oversight, 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. 16.2. The West Virginia Board of Education or its designee and the Secretary of the West Virginia Department of Health and Human Resources or his/her designee will maintain state oversight. 16.3. On or before the second day of January, 2004, the Secretary of the West Virginia Department of Health and Human Resources and the West Virginia State Superintendent of Schools will submit a report to the Legislative Oversight Commission on Educational Accountability and the joint committee on government and finance which addresses, at a minimum: 16.3.1. a summary of the approved county plans for providing the early childhood education programs under this policy. 16.3.2. an analysis of the total cost to the state and counties of implementing the plans. 16.3.3. a separate analysis of the impact of plans on counties with increased enrollment. 16.3.4. an analysis of the effect of the programs on the maximization of the use of federal funds for early childhood programs. 16.4 On or before the first day of December, 2004, and each year thereafter, the West Virginia State Board of Education shall report to the Legislative Oversight Commission on Educational Accountability.	

	continued	I agree with 18.618.6. WV Pre-k classrooms shall provide useable floor space of at least 35 square feet per child and available for children's activities, exclusive of halls, bathrooms, the kitchen, office space, or storage areas. Useable outdoor play space of 75 square feet per child shall be provided.I agree with limiting the classroom size to no more than twenty children with a 1:10 adult-child ratio.18.7. WV Pre-k classrooms shall limit classroom size to no more than twenty children per classroom. Ratios shall be maintained at 1 adult: 10 children with one adult being a certified teacher in accordance with §126-28-8, Personnel Standards.I agree with 18.818.8. 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 West Virginia Department of Education child and adult food program. Programs operating less than four hours will provide a snack as prescribed the West Virginia Department of Education child and adult food program.I agree with 18.918.9. Immunization. All children entering an approved participating WV Pre-k classroom that is participating in the county collaborative plan shall follow the guidelines of the primary (providing 51% or more of the funding that year) funding source regarding immunization. Participating programs that operate within a public school facility must follow West Virginia Code §16-3-4.I agree with 18.1018.10. Health Screenings. All children entering an approved participating WV Pre-k classroom that is participating in the county collaborative plan shall screen children 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 West Virginia Code §18-5-17.I agree that ECERS should be used as the self-assessment tool.§126-28-19. Program Evaluation.19.1. Beginning with the school year which starts in August 2004, all participating programs shall use the Early Childhood Environment Rating Scale (ECERS, Harms, Clifford, and Cryer, 1998) as a self-assessment tool to evaluate the programs success in meeting the needs of the children. This self-assessment will be submitted annually by the 30th day of June to the West Virginia Department of Education, Coordinator of Early Childhood, Building 6, Room 318, 1900 Kanawha Boulevard, East, Charleston, WV 25305-0330.		

	continued	19.2. Programs will be assessed using the ECERS by a trained outside evaluator every five years or if concerns from the West Virginia Department of Education, West Virginia Department of Health and Human Resources or county board warrant assessment.19.3. At which time the state has money and manpower to provide monitoring using the ECERS, programs may be required to have a trained outside evaluator evaluate the program more frequently.19.4. At which time a county has fully implemented their county collaborative plan and all eligible children in that county have access to a WV Pre-k classroom, the county board of education is required to annually submit a copy of the ECERS self-evaluation for each approved participating WV Pre-k program, a summary of the WV Pre-k services provided in the county, a collaborative agreement for each community partner providing services as an approved participating WV Pre-k program provider, the total number of WV Pre-k children served in each 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 Early Childhood Coordinator of the West Virginia Department of Education, by the 30th day of June (format attached). A copy of the report must be sent by the 30th day of June to the West Virginia Department of Health and Human Resources, Early Childhood Individual/Organization: Richard A. Price, College Title: Business: Professor and Coach		

11/20	Glen Jones Director Family Development Inc. Head Start Parkersburg, WV	126-28-2 Guidelines I have not heard any dissent on this point and I would say that this should stand as is as it is a very clear statement on what a program should look like. 126-28-3 Definitions 3.2 and 3.3 I agree with the definitions here but feel that school systems will seek to limit the number of partners that could be in a collaboration. Who makes the decision as to whom is part of the group that develops the plan, the Boards of Education or the group itself after it is formed? Boards will, I believe take a narrow interpretation of this and limit the number of participants. Also, I still believe that the word "contract" will continue to be misinterpreted and that the School Boards will see these as merely contracts between them and various entities and may not work with the collaborative group much beyond the formulation of the plan which, in their view, exists only to develop these "contracts". In our RESA meeting it became obvious to me that the Boards are using the word "contract" to also take more responsibility and direct dealings of the agencies with which they contract with rather than seeing this as a long term collaborative effort. Are these "contracts" between the collaborative group and the various agencies or between the Boards of Education and the various agencies? 3.6 This must stand as is. 3.7. I believe that the standard for minimum availability must stand as it is written. 126-28-4 Parent/Guardian Involvement and Family Support This entire section should be kept exactly as is or strengthened to the Head Start Standards. This is what will differentiate this program from all other education programs. If this program does not have any positive impact on socializing children and families to accept public school in a more positive way than it should not exist at all. Whole families need to accept education as part of their lives and meaningful inclusion at the beginning of the now 13 year process is crucial to the overall success of the child and the educational system as well.	N	+	
			A		addressed in 3.3, 6.5
			N	+	
			N	+	

	continued	Children must also be physically and mentally ready to learn at the highest level possible. 126-28-6 6.4 I really don't know what to make of this 50% rule. While I believe very strongly that some number or ratio of participation is necessary to keep the Boards of Education from dominating the program I am not sure that a "hard" number of 50% is the way to go. Differing conditions and capacities in the counties may make it impossible to achieve that specific a number for a variety of very different reasons. Also, how universal is universal? If all children that are eligible in a county were to show up, how could this be handled? In Calhoun County or example, the public school has two classrooms and Head Start has one in which a total of 60 children are served. Let us imagine that the collaborative is highly successful and 120 children show up in September to go to school. My first question would be: Since this is a public school system program all comers would have to <i>have</i> to be enrolled, would they not? The second question then becomes where do the children go if one or the other of us does not have the capacity to take 60 children? I have heard an explanation that the classroom is defined by who is running it but not necessarily where it is. So let us say that Calhoun has the extra classroom but that to meet the 50% Head Start must run it. Where do I get the people to do that in a timely manner with my grant already specifying what my personnel needs are? And then throw in the added complication of what the qualifications of those teachers would have to be since technically they are in a public school. Perhaps that it is implied, but not stated, that 50% is a goal and should be achieved incrementally by 2012 and not necessarily before then. 126-28-8 Personnel Standards The more I hear about this, the more confused I get. As I read it, A.A. degrees in early childhood can qualify and be "certified" and work under a permit. Board of Education personnel in several counties have told me this cannot be done as WV Law says certification can only be given to people with education degrees regardless of their specializations.	A	clarified in 6.4
			A	clarified in revision

	continued	This will certainly be contested by somebody. I do believe, however, that Head Start Teachers with A.A. degrees and years of teaching experience are the equal of many public school teachers. Then regardless of the education of those public school teachers. Then some education people have said that the A.A. teachers could not physically work in a public school even in a collaboration setting. I firmly endorse the idea of this entry level system as I believe that our Head Start teachers deserve and qualify for a part in this collaboration. I do not feel that just being a certified teacher who hasn't taught pre-school in 15 years or at all should get consideration over a Head Start Teacher with experience and the minimum educational requirements as defined in 2525. Also, there may not be enough teachers to run this system at the level of universal service or close to that level. Paper degrees do not make good teachers in and of themselves and experience should somehow be reflected in this system. 126-28-9 Regulation of Facilities This seems to be an area of hocus pocus. The DHHR people can inspect the schools but can't really do anything about it if they find them out of compliance but refer them to some agency. Some agency which apparently isn't getting the job done now is going to get a referral from DHHR and do what with it? Meanwhile, Head Start classrooms will continue to be put under threat of closure for conditions that are allowed to exist in public schools. If there are no teeth in the regulations and a collaborative cannot enforce these regulations on half of the collaborative, why go to the trouble of having this in 2525? I have advised the Head Start Association to seek legal advice as to suing the state over this in the past (I believe that it is a gross violation of the doctrine of equal protection and perhaps unfair competition) and will continue to do so. I am amazed that somehow kids packed into an inappropriate public school classroom will never burn to death but somehow they will in a Head Start classroom that could be closed down if one Exit sign is missing a bulb. Equal facilities means exactly that and not that some are just more equal than others. 126-28-15 Transportation This is skipped in the rules. In my opinion you cannot have universal pre-school without transportation. This will need to be included as soon as possible to avoid a legal challenge. Head Start will not and cannot stop running buses to its sites. Is it not discrimination to run buses to only some classrooms and not others?	N NA

	continued	126-28-16 Program Oversight A huge potential stumbling block that is left too much to the local collaboratives. If the classrooms are truly mixed and there are Head Start funded children everywhere I am still under the obligation to monitor the services given that child and evaluate that classroom and personnel. It is totally possible that I would have 5 children funded by Head Start in a public school classroom and I would have to evaluate the performance of that teacher and be able to take corrective action to get back into compliance with the Performance Standards. A clearer idea of how this is to be achieved is needed if not the specific stating of the fact that public school teachers would HAVE to accept this and the Boards of Education comply with it. These are my major comments. On the whole I feel that the collaboratives will need a lot of guidance and have a source of definitive answers during this process. I am glad that steps are being taken for that guidance. We will also definitely need a conflict resolution process as there are already underlying currents of unrest and fear of job loss and diminished prestige. We all, and I include myself in this statement, have to learn to "play well with others" as my old report cards say. That is not a task easily achieved without guidance and mediation. I believe this system can work and will be better for the children in the long run and I thank you for your work and the opportunity to comment. Glenn Jones Director, Family Development, Inc. Head Start Parkersburg, WV	N	

11/20	Tammy Chambers Kindergarten Teacher 510 N 2 nd Avenue Paden City, WV 26159	126-28-1 General. It has been my experience for the past nine years to witness students from various Early Childhood programs. Children coming from Head Start Programs appear to have a completely different philosophy when it comes to discipline. If programs are to become Universal, all programs need to operate with the same philosophy in order for transition to go smoothly. Behavior problems are very common with such programs. I also believe any teacher of children should be a certified teacher. It is not correct to assume that anyone can be a teacher. I do believe we need to communicate with all education programs. Instead of turning everything upside down we need to improve what is already in place.	N	O

			Rationale
11/22/02	Corinne Rice, on behalf of the Piney Oaks Head Start Parent Group, Beckley, WV	A bill called 247, otherwise known as 25-25 . . . that would make children at the age of four years old go to kindergarten rather than Head Start. 25-25 is not right, things should not change they should stay the way they are. Four year old children are too young for kindergarten, and the teachers are plenty qualified with their AA degrees and should not have to go back for the bachelor degrees. Clara Grimes (304)256-0564 ---- Some kinds are mature enough to go to kindergarten at four years old. And if more is expected it is okay as long as its not too much. Jamie Ware (304) 253-8774 ---- 25-25 is not a good idea because kids would have to start too early in such a vigorous atmosphere. Kids need to be kids at 4 years old. . . its such a young age. Furthermore we are satisfied with the training that the teacher's are receiving. . and we would like to stick with the system we already have. Ellen Edmonds . . . secondchance@zwallet.com ----- I feel that 2525 would be a great disaster. The children need to get used to the school environment before they are force to go to school. They need to learn basic skills such as sharing, listening, play well with others. . . excetra. There are a lot of children that are not ready at five years old for kindergarten let alone four years old. The system should stay the way it is the teachers should stay where they are. By putting these children in kindergarten they are being rushed into education and being expected to learn to quickly. By pushing them into education and forcing them to do things they are not ready to do it could make them less likely to pass into higher grands, and then they would be more likely to resent school and produce a higher drop out rate. Corinne Rice (304)255-7825	NA N NA NA

11/22/02	Yvonne Santin/Wood County Schools, Director of Special Education 1210 Thirteenth Street, Parkersburg, WV 26101	126-28-1 12.1.7. Change the work "shall" to "may" 126-28-3 The difference between the definitions of 3.2 and 3.3 is unclear. 3.7 change three and one half hours per day to a minimum number of hours per week 126-28-5 Documentation must be completed to monitor trends (if any) for further planning 126-28-6 Collaboration and the County Plan Many of the components of this plan will be inaccurate as the data is difficult to retrieve, i.e. projection of 4 year olds over the next 10 years, number of children <u>not</u> enrolled in approved programs, projected costs up to 2013. Part V: "to answer in detail" the following questions (which are <u>not</u> questions. This data is too specific . . . many of these items may need to be described as an assurance statement or to follow existing procedures.	NA N A N NA N	O - - see 3.8 O - based on suggestions of Superintendent Kay Carpenter - Webster County O	

11/20/02	Teacher Early Start for Wetzel County Schools RR2 Box 107, New Martinsville, WV 26155	126-28-2 2.1.1 Is this policy for Pre-K 4 year old students preparing for K? 126-28-3 Presently we have a pre-k-4 yr. old program in place for the past 10 yrs. It is operated by Board of Education in Wetzel County. We have a most unique Starting Points Center incorporating FRN, Headstart, Easter Seals, Even Start, etc. A visit to our center to see first hand how we operate would give valuable insight in the formulation of this policy. 3.6. Parent Choice concerning their child is vital to Education 3.7 Placing a specific day/amount of hours per day limits greatly the ability to provide scheduling accommodations and flexibility. Our schedule is 2 consecutive days - 5 hours per day. 126-28-4 4.1.5 Preschool Special Need is also part of our SP Center - we have these 10 years transitioned those students into the Pre-k program. Parental Rights, concerning their child, to make decisions on their education as well as the individuality of all children must be preserved. 126-28-5 5.1 Attend Policy is important 5.2 Parents making decisions about the education of their child must be held responsible for those decisions and make provisions to carry through! 126-28-6 6.1 It seems to be this Policy is giving County Boards of Education the <u>Responsibility</u> for the Plan but is <u>withholding</u> the necessary venue to carry through with the plan.		See Page 93

	Early Start Teacher (con't)	126-28-7 7.1 We are already operating a Pre-K program in collaboration with PSN, Even Start, Americorps, PAT housed in one location. Approximately 145 students serving 02/03 would not a waiver for us be an option? Waiver for an already policy approved program. 126-28-8 8.1 The pre-k <u>teachers</u> should hold at time of employment a teaching degree no less than a 4 year degree with a specialization in Early Childhood! At Employment hold a WU Certification as an Early Childhood Educator. Early Childhood Teachers Know how 4 year olds Learn. Non-Educated personnel <u>do not</u> have the skills necessary to maintain a Education <u>Rick</u> Pre-K environment w/Best Practices utilized for 4 yr old learning. 126-28-9 A visit to Wetzel County Center for Children and Families would show a Unique pre-school Inner Agency relationship. 126-28-10 Content Standards & Objectives are quite stringent. Pre-K should/could be the avenue to prepare for Transition to K. 126-28-11 11.1 Allowing only 1 curriculum - limits (cripples) a creative, exemplary educator of young children. 11.6 Excluding Desk re: age appropriate Tables/chairs cripples the development of a child's preparation for writing, cutting, etc and is not support of preparing PreK for Kindergarten! (Please eliminate from Policy)		

	Early Start teacher (con't)	126-28-12 12.1.7 - Non Duplication of Services is crucial to education in the future. 12.1 We have these objectives <u>in place</u> and operating smoothly in our county. 126-28-13 13.1 <u>All</u> PSN Pre K Students are transitioned, <u>included-</u> welcomed in out pre-k classrooms. 126-28-14 14.1 Staff Development is Vital to maintaining Exemplary Educators. However, it <u>must</u> be needs based. 14.2 Desired Results may follow WV STARS- but not mandated by this policy. 126-28-15 15.1 Bus Shuttle service is provided for our Pre-K students -parental choice to participate is voluntary. 126-28-16 Responsibility is Vague - Seems like Double Set of Rules and Regulations. 126-28-18 18.7 Class Size/Ratios are <u>adequate</u> but not utopia. 20/2 adequate 10/2 utopia.		

11/17/02	Dave Treharne, Executive Director, West Virginia Community Action Directors Association (304) 295-8807	Dear Dr. Jones Many of us said originally that "it couldn't be done" but you did it. Working coordination with the WV Department of Human Resources, you have forged a document in Policy 2525 that represents the best thinking of a wide variety of stakeholders who have participated in the discussion of implementing SB 247. Together, we have faced many challenges in drafting the present document and I am sure there are many you have addressed singularly in your own right. We endorse the present draft as it stands. Please be aware that I will be available to continue to work with you and Kay Tilton in implementing the program and ensuring that only the highest quality care and education is provided to our children. Respectfully, Dave Treharne	N	96.8	

11/20/02	Connie Stout, WWAYC 304-558-6268	West Virginia Association for the Education of Young Children- Members representing the Governing Board and Executive Committee On behalf of WWAYC we would like to commend Dr. Cathy Jones and other involved for their leadership in the development of the proposed rule, West Virginia's Access to Pre-Kindergarten System (2525). We would like to express our appreciation for the efforts and preparation. After reviewing the document, WWAYC would like to make the following comments. 126-28-10 WWAYC recognizes the importance of a developmentally appropriate curriculum for implementation in the young child's classroom as well as the need for professional accountability through guidelines which may be found in the West Virginia Department of Education content standards and objectives. Our concern is in how the content standards will be implemented in the prek classroom. Please clarify what the expectations of the prek teachers in the implementation and design of curriculum related to content standards would mean. We are also concerned with what the expectations are for young children as well as the relationship of assessments to the content standards. Specify how the results of these assessments would be utilized. WWAYC would like to suggest language that would support standards being implemented and assessed in ways to optimize child development. We feel it is our ethical responsibility to ensure that standards are always used in the best interest of the child. Our organization feels that it is essential to provide opportunities for professional development for teachers and administrators related to learning how to integrate content standards with the focus on developmentally appropriate practices for young children		duplicate

	Connie Stout, WWAYC	young children. 126-28-11 Curriculum WWAYC supports the curriculum design in that it is developmentally appropriate practices for young children. We would also support the necessity for assessments that are developmentally appropriate. Again, our organization feels that it is essential to provide training opportunities for professional development for teachers and administrators related to the curriculum and assessment standards as well as the content standards and objectives.			

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System (WV Pre-k)

COMMENT LOG

Comment Period Ends November 22, 2002

Action
 N: No Response
 NA: Not Accepted
 A: Accepted

Type
 - Negative
 + Positive
 o Neutral

Date	Individual/Organization	Comments	Action/ Type	
11-21	Irene Murphy imurphy@access.k12.wv.us	126-28-2. Guidelines. Please change three consecutive days to the minimum number of hours served each week. Personnel who are not certified should not be paid a teacher's salary during the five years they have to become certified. 126-28-5. Attendance Let the county decide how many days and which days. You may want to include a minimum number of hours to be served each week.	A N A	see 3.8 o see 3.8

11/20/02	Cathy Stout	126-28-6. Counties need more time to develop a truly collaborative, well developed plan, a lot of technical assistance and training will be needed, the contracting involved requires strong administrative involvement, counties do not traditionally have administrators in place who have knowledge of quality preschool education and a knowledge of community services. 126-28-8. If people with two year degrees are not given permits to teach in other areas of education, standards should not be lowered for preschool education, allowing people with two year degrees to have full permits while they finish their education diminishes the importance of having knowledgeable, well educated teachers to implement quality programs, five years with an uncertified teach is a long time and effects and a lot of children. 126-20-18. Children with special needs should be weighted when determining staff ratios and the number of children per classroom. Staff ratios and number of children per classroom should be different for three year olds the wording in 18.10 is unclear to me. It reads as if the children will be conducting the screening as opposed to receiving it. monitoring the preschool sites not located within schools?	NA	based on 18-5-44
			NA	- clarified in 8 actually school nurses set precedence
			N	see all other comments related to 2419

11/19/02	Sandy Walsh Director of Federal Programs, Monongalia County Schools 1433 Dorsey Avenue Morgantown, WV 26501	126-28-2. Guidelines. 2.1.2. The term "scientific research" may be difficult to located for young learners. I would prefer it to read, "utilize developmentally appropriate curriculum based on research about how children learn." 2.1.5. I would prefer the term "scientific research" be deleted and the policy read, ".based on research about how four-year-olds learn." 126-28-3. Definitions. 3.7 I am glad to see minimum program guidelines for operation are given. 126-28-5. Attendance. 6.1 I support the voluntary nature of WV Pre-K. 126-28-6. Collaboration and the County Plan. 6.4 I support the collaborative nature of the program and that 50% of the classrooms should be in the community. However, this may not be possible in some areas of the state. 126-28-9. Regulation of Facilities. I recommend deleting the last sentence, "In the case of public schools, West Virginia Department of Health and Human Resources Child Care Licensing staff will conduct monitoring visits and any recommendations for action will be made to the Office of Education Performance Audits." Public schools have health and safety checks and monitoring by OEPA. They do not need a children care license. I do not see the necessity for this last sentence.	N N N N N NA	o o + + + -	

11/19/02	Terri Wontrobski	Attached are my comments regarding Policy 2525. For the most part, I feel it is a very excellent policy. The partnerships with the Board of Education, Head Start, etc. are excellent. My comments are as follows: #1:126-28-4.Parent/ Guardian Involvement and Family Support. Page 3: I believe the section on this policy should be strengthened to include: requiring each county plan to address how they will work with each family in the areas of Literacy, Parenting, Employment, and Wellness so that parents/guardian skills can be strengthened as children transition into Kindergarten. The social service and parent involvement model for Head Start is very strong and is an excellent model to follow. These components are what make Head Start/pre-school so strong. # 2: 126-28-6. Collaboration and County Plan. Page 4: 6.4:In order to support counties in the effort to maximize existing resources and collaborate with other providers of early childhood education, no less than 50% of the classrooms for eligible children must be provided through contracts 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 or cannot meet the mandates of this policy. This may not be construed to mean that counties will provide education services in public school settings only and contract out support services both rather than 50% of the classrooms for eligible children must be contracted with qualifying providers in community settings. The ratio of community to public school providers can only be decreased with the written permission of both the West	NA	o but also not prohibited

		Virginia Board of Education and the Secretary of the WV Department of Health and Human Resources. 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. Head Start and Child Care have developed licensed classrooms set apart from the local public school district's Pre-School programs. I support that a minimum of 50% of the four year old classrooms be contracted to community programs, Head Start and Title I meeting the standards in this policy to provide the classroom space, qualified staff and financial resources to meet the goal. I feel that this policy also needs to be strengthened to mandate that all counties collaborate or to require a mediator to help them work it out if the T/TA facilitators were not successful. # 3 126-28-8. Personnel Standards. Page 6: 8.1 --Teachers must hold a qualifying certification/endorsement for teachers, specifically, early education, Pre-K endorsement, or birth to five. 8.3 I strongly support sections 8.2 through 8.3 for qualifications and the full-time permit to assure qualifying certification/endorsement of personnel. However, I	A	see 6.4

			A	+ clarified in 5202 & in revision
		However, I feel that it needs to be strengthened by saying the permit can only be issued if no qualified teachers are available. First priority must be given to certified teachers, then permit teachers can be considered. # 4 126-28-9. Regulation of Facilities and 126-20-18 Health and Safety. Page 7 -9.1: All approved participating WV Pre-k programs, see definitions, that are included in the county collaboration plan must meet the requirements as set forth in the rule promulgated to replace and/or update 64CSR21. Public schools or other programs who are exempt under West Virginia Division of Health Legislative Rules Child Care enters 64CSR21 or its replacement must meet the requirements et for in that rule. In the case of public schools, West Virginia Department of Health and Human Resources Child Care Licensing staff will conduct monitoring and any recommendations for action made to the Office of Education Performance Audits. Licensing mandate for school board should be emphasized so that school systems understand that they <u>must</u> meet licensing requirements. Thanks for your consideration and all your hard work.	A	+

11/16/02	Rev. Scott Mapes Senior Pastor Ravenswood Church of the Nazarene 1108 Gallatin Street Ravenswood, WV 26164 Please note: I am also secretary of the Day Care Board for Good Shepherd Family Day Care, a ministry of our church.	General It will be helpful to make it clear that this policy provides a universal pre-K program, not that it is mandating that all four year olds are required to attend a pre-K program. This point of confusion has created some opposition to the plan, from my vantage point. Curriculum and assessment. Under paragraph 126-28-11.4.1.a, I am concerned that one particular plan of action not be forced upon participating programs, based on any one biased view of developmental psychology. There are points at which there may be some disagreement - such as the role of religious education in the preschool years-and freedom and flexibility should be given to participating programs and the families of the children affected. Thank you for this opportunity to comment on the revised policy.	A	see 2.1.1	
			NA	state & federal \$ cannot support religious curricula	

	Kelli Whytsell Preschool Teacher Pleasant Hill School H.C. 68 Box 2 Grantsville, W.V. 26147	126-28-1. General. 2.1.7 School system should employ professionals who are teachers with a specialization in early childhood. 2.1.11 Class size should be 5:1 when working with young children especially ones that are not yet toilet trained. There is a big difference between preschool and kindergarten age students. 126-28.3 Definitions. 3.7 Rural counties can not offer half-day classes because of transportation problems. Preschool classes should be on alternating days if the students are going all day. For example Monday/Wednesday/Friday. This allows young children to rest on days not in school. We need to look at not only the long school day but also the length of time the students are on the school bus. This could also be changed to reflect the number hours a student is in school, instead of attending consecutive days. 126-28-4. Parent/Guardian Involvement and Family Support. 4.1.2. Home Visits are necessary when working with young children. This helps establish an early home/school relationship. The preschool teachers need time in their schedule to allow for working with families in their home. 4.1.5 Integrated preschool classroom with certified professionals and paraprofessionals working with young children. 126-28-7. Collaboration and the County Plan. 6.4 Small counties do not have the resources and personnel to have 50% community programs. Our county currently shares students with day care and head start. Policy makers need to look at which individual counties currently have and see if that meets the needs of the students in their county. 6.5 The state has trained Tadpole members in each county; this should be development in to the collaborative planning team. The state needs to provide funding, time and resources to expand these meetings.			see other Grantsville comments

Kelli Whytsell (Cont.)	planning team. The state needs to provide funding, time and resources to expand these meetings. 126-28-8. Personnel Standards. 8.1 Current teaching certifications to include specialization in early childhood endorsement. 8.2.2 All professionals working with preschool students employed by a County Board of education should be required to meet the same teaching standards as teachers working with other students in the school system. 8.3 Persons employed to meet staff/child ratios such as aids; paraprofessionals should be paraprofessionals as outlined in the WV school law 18A-4-8 paraprofessional 18A-3-2a 126-28-14. Staff Development. 14.3 45 hours of training should be decided by the county collaborative planning team or Tadpole. Teachers employed by the local board of education should not be required to do additional 18 hours of staff development to meet county staff development plans. 126-28-17. Financing. To implement a quality preschool program and to sustain this program adequate funding must be in place. Quality preschool program uses a lot of consumable materials, crayons, construction paper, paint, play-doh, glue, sand. These materials need to be replaced yearly. Also age appropriate playground materials and equipment needs to be provided. A quality preschool program should provide field trips to reinforce learning opportunities, to the library, fire station, doctor office or a farm, Funding needs to be provided for these educational opportunities. The funding needs to be in place every year not just the first. 126-28-19. Program Evaluation. Many counties currently use the Battelle Developmental Inventory (BDI) as their assessment tool. The counties have purchased test booklets, computerized scoring, testing materials and provided teacher training to		

	Kelli Whytseil (Cont)	have purchased test booklets, computerized scoring, testing materials and provided teacher training to administer the tests. The counties should be allowed to continue to use this assessment. In an integrated preschool program that has students with IEP's and norming peers. This type of program is monitored by the Department of Special Education. This should be continued and enough monitoring to satisfy this policy. 19.4 The state should survey or require a report from each county to see what preschool program currently exist in their county. Look at what exist now and see if they are meeting the needs of the preschool students and their families. One plan will not work for all counties. Especially when working with young children and their families. Programs need to be flexible and reflect the needs of the children you are working with not the needs of the policy makers. Preschool children with special needs sch as communication, fine and gross motor, developmental delays need to be in the same classroom as other preschool children. Preschool children learn from each other and through modeling and play. Classes need to be small so that individual attention and needs can be addressed. If West Virginia is going to implement a Pre-Kindergarten policy then we need to be a leader and have a high quality child focused program.		

11/19/02	Teresa Lawlor	Overall I think the policy is good. There are a few comments on specific issues that are listed below. 5 Attendance There is concern regarding how much control a parent would have in removing a child from a program when the program administrator and teacher do not agree with the parent. Could the parent and child face the same penalties for truancy as those in regular school now? 6.4 I agree with this section to maximize existing resources and collaborate by utilizing more that 50% of the classrooms provided through contracts. 7 Waivers I agree with this section 8 Personnel Standards I agree with this section 9 Regulation of Facilities I am glad this section mandates the requirements for licensing. There is a concern regarding the consistency of enforcement. Once recommendations are made to the Office of Education Performance Audits there is no control from there to the action taken. We would hope it would be consistent with the action DHHR would take regarding a privately licensed child care center.	N	0	
			N	+	
			N	+	
			N	+	

11/19/02	Marlene Midget	126-28-1. General I support Policy 25/25. This is long overdue for our children in West Virginia. 126-28-4. Parent/Guardian Involvement and Family Support. This section needs to be stronger to ensure all families receive the support they need to attain their goals. This section is also vital to the success of our children in school. Each county plan must have a strong parent involvement system, that recognizes parent as the primary teacher of their children and services that support self-sufficient. 126-28-5. Attendance. Attendance must be at least three consecutive days a week and at no less than three and one-half hours each day for our children to attain the benefits of the Pre-K program. 126-28-6. Collaboration and the County Plan. I support the 50% of the four year old classrooms being contracted in the community programs and they also must meet all the standards. 126-28-8. Personnel Standards. I support the 8.2-8.3 for qualification and the full time permit for qualifying personnel. 126-28-9. Regulation of Facilities. I support requiring all programs serving four year children in a Pre K setting have to meet the WV department of Health & Human Resources Child Care licensing Regulations. 126-28-11. Curriculum and Assessment. The curriculum and assessment must be age and developmentally appropriate and not a watered down kindergarten or 1st grade. 126-28-14. Staff Development and Training. Excellent system for training staff and encouraging staff to improve their education. 126-28-15. Transportation. WV Pre K must provide transportation to all four year olds. Failure to do so would	N	+	
			A		see revisions
			N	+	
			N	+	
			N	+	
			N	+	
			N	+	
			N	+	
			NA		- financing - see previous comments

	Marlene Midget (Cont)	exclude the neediest of our children from attaining their education. 126-28-17. Financing. I support this section as it is written. 126-28-18. Health and Safety. All children must have immunizations and screenings according to the set standards of the funding source. 126-28-19. Program Evaluation. The ECERS evaluation should be implemented every three years, to be effective and timely to monitor progress in the four year old program.	N N N	+ + +		
11/22/02	Cynthia Parker Lewis County Schools Title I Coordinator	The policy seems to allow less qualified/certified instructors than regular public education in a time when "No Child Left Behind" is calling for more highly qualified personnel. In order to better prepare our children for their formal education, we should have the MOST qualified teachers and aids. Our county has been working very hard to integrate preschool in to our existing schools with full collaboration with Headstart. It does not seem appropriate for us to have to dismantle these in order to have 50% in the community. Can WV Board Policy really govern outside agencies? What real authority will local school systems have in monitoring the preschool sites not located within schools?	N		o clarified in revised 6.4	

11/19/02	Cher McKeever Northern Panhandle Head Start, Inc. Administrative Assistant Federally Funded Head Start Infant/ Toddler Preschool Program 51 16 th Street, 4th Floor Wheeling, WV 26003	126-28-3. Definitions. 3.7 Minimum program availability. I believe that, at a minimum, a 4 yr old pre-kindergarten classroom should operate 3 consecutive days a week and for no less than 3 ½ hours each day during the school year calendar. 126-28-6. Collaboration and the County Plan 6.4 no less than 50% of the classrooms for eligible children must be provided through contracts with community programs. I believe that allowing this provision provides for maximization of federal funds including other state resources through child care subsidies according to meet the individual needs of families and their desire to select a high quality early childhood education program for their 4 year old child. Many partnerships exist in communities across WV that are extremely successful fo everyone involved! A collaborative effort of this nature will also bring a great deal of expertise from a cross section of the education arena (not to mention strengthen the system), together, to meet the educational needs of our young children. I believe that the collaborative plan must include a fair and equitable enrollment form and ensure that federal funds are maximized without jeopardizing the volunteer enrollment and without regard to segregation based on socioeconomic	N	5238.7

		back to those contractual community programs and county school system provided programs rather than utilized in other areas of public education in the county. Adequately funding this pre-k system should be fair and equitable and the funds generated from the same should remain within the pre-k system.		
		126-28-18. Health and Safety. Ensuring that the highest regard to the most stringent safety standards/requirements are met by each participating program is critical. Every child deserves a safe and healthy environment in which to learn and grow developmentally, emotionally and physically. 126-28-19. Program Evaluation. Ensuring that an annual self-assessment is completed can only be a "positive" for this new system. Using one document for each participating program assesses them from the one perspective. This system should encourage growth for those program who previously did not conduct annual self-assessments.	N	0
			N	

11/19/02	Cathy Williams Northern Panhandle Head Start Inc. Fiscal Manager Federally Funded Head Start Infant/Toddler and Preschool Program 51 16th Street, 4th Floor Wheeling, WV 26003	126-28-3. Definitions. 3.7 Minimum program availability. I believe that, at a minimum, a 4 yr old pre-kindergarten classroom should operate for 3 consecutive days a week and for no less than 3 ½ hours each day during the school year calendar. 126-28-6. Collaboration and the County Plan. 6.4 no less than 50% of the classrooms for eligible children must be provided through contracts with community programs. I believe that allowing this provision provides for maximization of federal funds including other state resources through child care subsidies according to meet the individual needs of families and their desire to select a high quality early childhood education program for their 4 year old child. Many partnerships exist in communities across WV that are extremely successful for everyone involved! A collaborative effort of this nature will also bring a great deal of expertise from a cross section of the education arena (not to mention strengthen the system), together, to meet the educational needs of our youngest children. I believe that the collaborative plan must include a fair and equitable enrollment form and ensure that federal funds are maximized without jeopardizing the volunteer enrollment and without regard to segregation based on socioeconomic 126-28-8. Personnel Standards. 8.1-8.3 Personnel Standards. Allowing the provision for teaching staff that will become part of a collaborative classroom to attain the qualifying certification required by the WV Board of Education should be perceived as a win-win! The expectations that a preschool program delivers a high quality learning experience for 4 yr olds begins with the qualifications and experience of the teaching staff (not to mention their enthusiasm and love for children). 126-28-9. Regulation of Facilities. Ensuring that the participating programs meet the requirements of the WV Child Care Licensing law is a positive step for safe and healthy environments for children and their families. Allocating the child care specialist as a	see Cher McKiever

			positive step for safe and healthy environments for children and their families. Allocating the child care specialist as a resource to monitor the public schools and recommendations for action provided to the OEPA is commendable. 126-28-11. Curriculum and Assessment. Inclusion of parents as collaborative partners in planning and outcomes for children is vital to the parents' understanding of the individual needs of their child. Creating a positive, learning environment conducive to meet the developmental needs of each child is important and necessary for a successful pre-k experience. In addition, linking parents and teachers together invites open communication and the potential for involving parents in their child's learning experience on a more one-on-one basis. 126-28-15. Transportation. It may be an option if the funding source provides such a resource to families, but an increased number of families will utilize the service if transportation is provided. 126-28-17. Financing. 17.2 Money generated will be used to support the participating programs.... This will assist in the process that funds secured through the funding formula actually comes back to those contractual community programs and county school system provided programs rather than utilized in other areas of public education in the county. Adequately funding this pre-k system should be fair and equitable and the funds generated from the same should remain within the pre-k system. 126-28-18. Health and Safety. Ensuring that the highest regard to the most stringent safety standards/requirements are met by each participating program is critical. Every child deserves a safe and healthy environment in which to learn and grow developmentally, emotionally and physically. 126-28-19. Program Evaluation. Ensuring that an annual self-assessment is completed can	

[illegible]

11/20/02	Kenny Dean Executive Director N.C.W.V.C.A.A.	I would like to personally applaud the efforts of "the Team" in your development of a comprehensive policy. While I will not endeavor to make reference to specific Policy sections, there are a few areas about which I have serious concern and other concerns where no policy definition exists. They are as follows: 1) Within a rural state as is WV, transportation is a vital element of service success. While I am not sure it should be a mandated service element, I am sure that those of a lesser economic status will suffer more greatly from the lack of transportation supports. There is evidence within the Policy that cogent thought has been given about the blending of classrooms with all socio-economic grouping. Therefore, I believe that the Policy should address the transportation service issue even more strongly. 2) There has been discussion that the 50% (community service) provision issue is under challenge. I -STRONGLY-recommend that this provision remain intact! While I do understand the concerns of "school systems" where there is presently a dearth of community and private providers, the present Policy of "waiver allowability" provision does offer opportunity for local flexibility of service design. Furthermore, certain local designs for the service to 4 year old children might serve to stimulate additional private business development. It is my opinion that this potential not be thwarted by amending the "rule" of "a minimum of 50%". 3) The monitoring of collaborative classrooms has proven to be a serious obstacle within some previous and even a few present collaborative efforts. I contend to you that Head Starts are required to regularly monitor their classrooms and other service venues in order to approach compliance with the "Performance Standards". An agreed upon monitoring process is paramount to potential success of the local collaborative. A clearly defined monitoring/reporting process and procedure must be part of the local collaborative	General comments not specific to sections

			collaborative agreements and should be a requirement of the "Policy". 4) There is no reference to "conflict resolution" within the "Policy". I report to you that the best of these collaborations will NOT be absent of conflict. I strongly urge that there be established some formal process for resolution of conflict. Facing problems is a daily activity. How we resolve those problems, more often than not, shapes our future. Conflict resolution procedures ought to be given its "due diligence"!!! Thanks to the State Board of Education and to DHHR for allowing comment and suggestion!	

11-20-02	Ruthann Arneson	Comments/Suggestions 126-28-1. General. Parents MUST be involved. We support the minimum of two parent conferences, parents involved in the plans to implement 2525 and opportunities for parents to participate in decision making about their child's education. We support the no less than 50% collaboration with community programs. We support the Personnel standards as written. This provides for experienced early childhood staff who can implement quality programming. We support the curriculum and assessment standards they consider the Head Start outcome measures and support developmentally appropriate practices.	N	+	
			N	+	
			N	+	
			N	+	

11-20-02	Mingo County EOC, Inc. Head Start 815 Alderson Street P O Box 1406 Williamson, WV 25661	Comments/Suggestions 126-28-4. Parent/Guardian Involvement and Family Support. Suggest inclusion of specific terminology relative to adult literacy, enhancing parenting strategies, family goal setting, etc. If families have a plan that will enable them to grow, the child and families' transition and participation into public school will be more beneficial to all. 126-28-6. Collaboration and the County Plan. GREAT! This stipulation is ensure the opportunity of all programs to participate in this program in an ACTIVE manner. This will enable Boards of Education opportunities to provide services even though there is limited funding and/or facilities, This will also enable the public school system to become more a part of the communities. In addition, children and families will enjoy a wider range of services available to their families, better communication with public schools and less resistance to participation in public school programs. 126-28-8. Personnel Standards. YES! This section provides for everyone- it ensures that teachers are qualified with certifications relevant to the group of children served and it allows a place for those attempting to become certified. It is so important that staff be well-versed in early childhood development in order to appropriately provide for very young children. 126-28-9. Regulations of Facilities. This mandate has been needed for a long time. It is only logical to expect that ANY agency offering services to young children must be of high quality in relation to curriculum as well as facilities. If children are in an environment that doesn't meet the minimal requirements for Child Care Centers, then, there is a definite problem. Out children deserve to attend school in an environment that is optimal to learning. 126-28-10. Standards for Preparing Students. If there is a conflict regarding different curriculum standards (Kindergarten, Head Start, WVPK), who resolves the	N	O
			N	+
			N	+
			N	+
			N	O

		conflicts? Which one supersedes? Need clarifications..... 126-28-11. Curriculum and Assessment. <u>Like It! Keep It!</u> This guideline provides for the development of the whole child. It is wonderful to know that "developmentally appropriate" curriculum will be mandated. It is SO IMPORTANT to ensure that children are not expected to succeed in a "watered down" kindergarten curriculum. 126-28-12. Transition and Continuity. 12.1.3 GREAT! Information-sharing is a good way to ensure the best from all. 126-28-15. Transportation. Transportation is a major deterrent to our children's participation in the program. If transportation is not mandated, the children who need it the most, will most likely, not get it because they can't get there. We must provide transportation. 126-28-18. Health and Safety. 18.3 Please define "rat-proof construction"..... no wood building? Suggest using "...restricted to steel or masonry construction" 18.8 There is no requirement for "snacks" for extended days - Head Start standards require it. 18.9 Head Start helps families acquire immunizations for their children if they are not up -to-date and BOE does not accept children in the program without being up -to-date.... how will this be resolved? 18.10 GREAT - these screenings and subsequent intervention is vital to children's ability to learn. 126-28-19. Program Evaluation. Other programs may have specified evaluation tools required by funding sources (such as Head Start) and a required onsite review process (tri0annual) - must have allowance for these monitoring processes.	N N NA A N N N NA	+ + - previously addressed many times - deleted - see section 9 - included in cited regs - clarified in 18.9 + - however not prohibited

11-18-02	Donnetta Rainwater Preschool Special Needs Instructor Logan County Schools	Comments/Suggestions 128-26-1. General. I currently have three teaching degrees. I have K-8, gifted and preschool special needs. To take a class at Marshall, I have to drive 75 miles one way, after working all day for a total of at least 150 miles. I have worked in preschool special needs since 1996 and the school system since 1990. I have worked my way to a job I enjoy doing and I would like to think I do a good job I know my area, my parents and most of all, my students. I know what is expected of me and have always received good evaluation for my job. With the new program of Birth to Five, I must return to Marshall and take classes again. As I stated, driving 150 miles a night (If they offer evening classes) After working all day. I know I am not the only one with these concerns. I have worked it he school system for 11 years. I guess preschool special needs could be "grandfathered" into this new degree. It would be so difficult for me to obtain this certification if I have to drive to Marshall. After all, I'm 45 years old now! Please assist us in any way you can so the state will now loose experienced teachers due to obtaining this degree.	A	- see 8.1

11-18-02	Peggy Hayden 34 Sea Breeze Lane Bristol, RI 02809	Comments/Suggestions. 126-28-1. General. We applaud referring to this policy as the "Pre-kindergarten System" opposed to the "4 year-old program". Use of the term "Pre-kindergarten System". - Reinforces that services provided in accordance with this policy are to be made available for 4- year old children and 3-year old children as mandated under federal law. - Is forward looking. That is as resources become available over time on the state or local level to expand services to children age 3 and under, the term "Pre-kindergarten System" will still be an applicable title. - Focuses on a "system" and not a single program or component of that system. This underscores the collaborative nature of this policy related to multi-agency planning and implementation of new services building on the foundation of the Birth-kindergarten system currently in place in the county. We appreciate the considerable time and effort of the many people who have created policy and resources for this program. This policy reflects best practice in the early childhood field and is an important step in our state in providing quality services to young children that will enable them to achieve at high levels and ultimately become the type of citizens this state needs to progress. It is results oriented. That is, it emphasizes both the services to be provided and the desired impact of those services on children (learner outcomes). We applaud the emphasis on inclusion of children with disabilities in this system in services that are not segregated because of disability. This puts the emphasis on children first. Additional emphasis should be included in policy and in training that this is NOT a public school program. Although the public school is key player, the system is based on a	N	+ first section in support

		foundation of collaboration with participating agencies as EQUAL partners. It is critical that adequate resources be allocated for supports to ensure appropriate implementation of this policy including: • State level training and technical assistance staff and resources to support county collaborative teams in the development, implementation, oversight and evaluation of local systems. • Resources that county's can tap to provide individual program and/pr child supports related to planning, implementing and evaluating quality, inclusive services at the local level. 126-28.2. Guidelines. 2.1.5 use a learning approach that reflects most effective practice based on scientific research about how four-year-olds and three-year-olds learn <u>including those with and without special needs.</u> 2.1.7 employ staff with strong professional education preparation in child development and early childhood education and, <u>as appropriate, early childhood special education.</u> 2.1.9 incorporated meaningful ways of communicating with and involving parent/guardian <u>and/or other family members as appropriate.</u> 126-28-3. Definitions. 3.1 Approved funding sources means any funds used directly to support WV Pre-k classrooms for eligible children including school aid formula, Head State funds, Even Start funds, Temporary Assistance to Needy Families, Child Care Development Funds, funds under the Elementary and Secondary Education Act, <u>funds under the Individuals with Disabilities Education Act</u>, funds provided by the School Building Authority, and any other private or public funds. (Rationale: This underscores the intent that this be an inclusive program related to services for children with an with disabilities. 3.6 Eligible child shall mean any child, regardless of ability		o added o o added wording came from 18-5-44

		or whether he/she is toilet trained, who is four by September 1 of the year he/she is to enroll or whose enrollment is mandated under state and/or federal law including children with disabilities who are three years old and who are eligible for enrollment as of their third birthday in accordance with the individuals with disabilities Education Act, Policy 2419 and related state requirements. If it is in the best 3.8 West Virginia's Pre-k means kindergarten readiness programs including, but not limited to, developmental kindergartens, four year -old kindergarten, <u>services for children with disabilities ages three and four</u>, and other programs..... Additional Comment 3.7 The Committee supports this requirement, because it is based on scientific research on effective practice. The Committee realizes that implementation of this provision will be challenging and require adjustments in current services in many counties. Nevertheless, this requirement should be retained to help ensure maximum benefits related to learner outcomes for the children participating in the Pre-k system. 126-28-4. Parent/Guardian Involvement and Family Support. General Comment The Committee supports emphasis on this topic. It recommends that in this section and throughout the policy, whenever the term "parent/guardian" is used that it be worded as "parent/guardian and/or other family members as appropriate" - depending on context appropriateness. 4.1.3 services to children and their families necessary to support the child and family's transition into, participation in, and transition out of the program. Comments: How are services defined? What are expectations? A benefit of the collaboration required in the county plan is that a multi-agency approach will provide a greater array of services in this regard. Also, Webster County provides a good model. 126-28-5. Attendance.	N A N N A	o reference to state & federal law 3.9 + + added

		Add 5.1.3 Each county must make reasonable efforts to ensure that the parent/guardian and other family members as appropriate understand about the availability of services, the attendance policy and the benefit of early childhood education. 126-28-6. Collaboration and the County Plan. The Committee supports the policy proposed her (see general comments at the beginning of this document). 6.5 The county collaborative planning team must include at a minimum a representative from: the county school system preschool program, the county school system preschool special needs programs in that county not operated by the county school system (all non-county school system child care programs must be given the option of participating). the Head Start program in that county, the local department of health and human resources, and a parent guardian and/or other family members of a preschool child. Agencies represented on this team shall operate as equal partners. 126-28-8. Personnel Standards. The Committee supports the policy proposed here, because personnel qualifications are key to quality services. Information needs to be made available related to options through which person in the field can meet these requirements. The Committee is particularly glad to see reference to WV STARS. 8.3 Modify the final sentence to read: Aides and assistants must have an individualized staff development plan for specifying his/her planned progression on the career pathway toward level V within 5 years. 126-28-10. Standards for Preparing Students. The Committee supports the policy proposed here, because it is results oriented, reinforcing learner outcomes so key to ultimately producing educated citizens. I also underscores interagency collaboration and program continuity as children transition from one program to another. 126-28-11. Curriculum and Assessment The Committee supports the policy proposed here, because it is reg	A A N A N	added 5.2 see 6.5 + added +

		because it is reflective of scientific research on effective practice. 126-28-12. Transition and Continuity. The Committee supports the policy proposed here, because it is reflective of scientific research on effective practice. 12.1 Each program participating in the county plan must have a written and implemented plan for transition children into the <u>Pre-k System and out of Pre-k services</u> into kindergarten..... 12.1. an opportunity for the child and/his her family to visit the setting into which the child is transitioning, i.e., <u>Pre-k System or kindergarten classroom.</u> 12.1.2 written information to parent/guardian and/or other family members as appropriate about <u>Pre-k or kindergarten registration and what to expect in the Pre-k or kindergarten.</u> 12.1.3 an opportunity for teachers/providers in the <u>WV Birth to Three System, the Pre-k System, and kindergarten programs</u> in that county to meet annually to discuss how to facilitate successful transition and support the reciprocity of readiness practices. 12.1.5 policies and procedures for the <u>transition of children with Individualized Education Programs out of the Pre-k System and into kindergarten.</u> What is 3.1.1 of this policy? Add 12.1.8 <u>policies and procedures for the transition of children with disabilities and their families from the WV Birth to Three System to the Pre-k System in accordance with state and federal requirements.</u> (renumber this provision, placing it prior to 12.1.5.). 126-28-13. Inclusive Environments. The Committee supports the policy proposed here, because it is reflective of scientific research on effective practice. 14.1 Each county plan will.... <u>inclusive environments and children with special needs.</u> 126-28-15. Transportation. 15.1 For programs participating in the county collaborative plan, transportation is considered a support, not a mandated service	A	added language to strengthen section 12 based on these comments added

			mandated service unless it is a related service for children with disabilities in accordance with state and federal requirements. 126-28-16. Program Oversight. The Committee supports the policy proposed here. It strongly encourages the allocation of sufficient fiscal and staff resources to adequately implement these provisions. 126-28-19. Program Evaluation. The Committee supports the policy proposed here, because it is reflective of scientific research on effective practice. Add 19.5 The state shall develop and institute a system of longitudinal, scientific-based research to track learner outcomes, family satisfaction, program continuity and related variables in order to evaluate program impact. The system shall be designed in such a way to be of benefit on both the county and state level.	A	added
				N	+
				A	added
11/20	Cheche F. Price Head Start Education & Training Manager	I agree with section 6.4 I agree with 126-28-8, 8.1, 8.2, 8.21, 8.2.2, 8.2.3, 8.3 I agree that 9.1 should remain as it is. I agree with 126-28-10 I agree with 126-28-11 I agree with 126-28-14 I agree with 126-28-15 (15.1 through 15.3) I agree with all 126-28-16 I agree with limiting the classroom size to no more than twenty children with a 1:10 adult-child ratio I agree with 18.818.8. I agree with 18.918.9 I agree with 18.1018.10. I agree that ECERS should be used as the self-assessment tool.	N	+ for all comments	

11/20	Gregory H. Cartwright Director of Curriculum and Instruction Calhoun County Schools RR 1 Box 1E Grantsville, WV 26147	126-28-3. Definitions. The proposed delivery model of a minimum of three consecutive days per week would diminish the services that we currently offer to our pre-school students. We currently offer a full day program with a flexible number of days per student based on the individual student's needs. Many of our students attend for two full days per week which would amount to more services than the required three half days but would not meet the requirement. The half day model would also necessitate mid-day bus runs which would be prohibitive in cost for us. We would anticipate that this transportation need would actually result in two complete sets of mid-day runs – one to take the morning students home and another to pick up the afternoon students since we could not provide the 3 ½ hours, take student home and have the other students back in time to provide the required 3 ½ hours before the afternoon runs. 126-28-6. Collaboration and the County Plan. Our pre-school programs have been well coordinated in a collaborative effort with the needs of students as the focus. The county educational system should be the lead organization in the development and implementation of pre-school programs, not the DHHR. It is our primary goal to educate students – it is not their primary goal. Requiring that no less than 50% of classroom be provided through community programs would be counterproductive in our county. We currently operate an extensive program for pre-school students serving both handicapped and non-handicapped students. This requirement might limit the number of classrooms that we could offer because to the other limited opportunities provided outside the school system.	A	see 3.8
			A	see 6.4

		Personnel Standards. The standards for the certification of personnel to be providing the pre-school programs are contradictory to all other current trends. We are constantly seeking to raise the standards for preparation programs for teachers and par-professionals while this policy would suggest a sharp decline in the requirements for those working outside the school system. The standards for all programs should be raised to provide well trained and fully certificated teachers for all students regardless of the setting. Regulation of Facilities. Facilities will be evaluated by the Office of Educational Performance Audits with monitoring responsibilities assigned to the DHHR. It appears that the LEAs should be responsible for the monitoring of all aspects of a pre-school program rather than DHHR. Staff Development and Training. Staff development requirements for pre-school personnel should be in line with staff development requirements for all other educational personnel. If we have fully qualifies and certified personnel, the 18 hour annual requirement for all others would be sufficient. Transportation. As stated earlier, transportation for ½ day programs would be prohibitive in our county. We are currently transporting students for our full day programs without the need for additional runs at mid-day. Program Evaluation. I would certainly hope that counties would not be expected to incur costs for program evaluation. I do not find this clarified in the draft policy.	NA	- due to collaborative nature of policy
			NA	- but a good idea
			A	- see 14 revised
			A	3.8 allows flexibility
			N	o

11/20	Cynthia Curtis	The following is a list of the items in Policy 2525 that I would especially like to see retained: 3.7 Requiring that pre-K programs can be as little as 3 1/2 hours/day to qualify. 6.4 Support, although I hope you can retain the flexibility that fewer than 50% of programs need to be in one setting or another, depending on the circumstances in a particular community. 6.5 Support 6.6 Support 6.9 Support 6.10 Support 8.2.3 Support 9.1 Support 11.4.1 Support - maintain the idea of the current thinking that preschoolers learn best through play. 11.4.2 (b) Support a variety of daily activities including outdoor opportunities beyond 15 minutes of recess. 11.6 Support 13.1 Support	N	all comments are supportive
11/21	Tamara L. Clarkson, MA (tclarkso@access.k12.wv.us) Preschool Special Needs Center-Based Teacher with 14 years teaching experience in this field Henry J. Kaiser Elementary / Jackson Co. Bd. Of Ed. Kaiser Avenue Ravenswood, WV 26164	126-28-3. Definitions. 3.6 Eligible Child — Under Guidelines 3 and 4 years old are included but this is not reflected in this definition 3.7 Minimum Program Availability — My program has never been consecutive days and my concern is why this needs to be in the definition. My point not only being specificity in the definition, but three days spread across five days with a maximum of three days without service (intermittent) should be just as if not more successful as three consecutive days followed by four consecutive days without service. This should be county discretion.	A A	clarified in 2.1.2 3.8 - consecutive days based on research frequency & intensity of services matter

	(Continued)	§126-28-8. Personnel Standards. 8.1 and 8.2 — My concern is in regards to preschool special needs teachers that do not have a teaching certification in Pre-K or Early Childhood and currently teach in a reverse mainstream setting (peer models and children with delays). I have taught preschool special needs for 14 years with a minimum of 5 years in a reverse mainstream setting. I also have a Masters +45 and believe it would be grossly unfair and biased to require any teacher with similar teaching credentials, experience, and successful evaluations to be placed on "full-time" permit. It is my hope that a "grandfather" clause would be added to this policy. 8.2.3 — Persons with an "AA" certification would be on full-time permit. My concern is to the pay scale that these persons would be placed and whether this pay would be coming from the county board of education. Surely, these persons would not be paid based on the county professional pay scale (in which teachers or persons holding a 4 year degree that are teaching on permit) because their students are included in the enrollment of the county school system. §126-28-11. Curriculum and Assessment. My concern is regarding the curriculum that will be used in all facilities and the research it is based upon.....HighScope is an excellent child-centered, play-based curriculum that parallels NAEYC recommendations.	A A N	- see 8.1 - clarified o	

	(Continued)	§§126-28-18. Health and Safety. 18.6 - If the plan to have 20 children in a classroom totaling 700 sq. ft. includes ample materials needed to successfully implement a curriculum appropriate for 4 years olds which should focus on play, I am concerned about crowding and truly uncluttered space conducive for child's play. Moreover, if a child with physical handicaps were in this classroom with his/her adaptive equipment needed so that he/she can participate with others his/her age, it would be extremely crowded. Please consider an increase in the space, a decrease in this number, or modifications to pupil-teacher ratio that includes children with special needs. (see below) 18.7 — 20:2 Ratio —Our kindergarten classes have 20 children that are potty trained and have 1 year of maturation and development above the typical 4 year old. Our preschool classes SHOULD NOT have that many children! I would be interested in viewing the research that shows that this number is in best practice.	N	35 sq. ft./child is the minimum -	
11/21	Marvin P. Shelton Jr. Lewis County Schools, WV Preschool Teacher B.S. Early Childhood Education / Masters in Pre-K to 12 in Reading 53 Hinzman Street Weston, WV 26452	COMMENTS/SUGGESTIONS§§126-28-1. General. The section 6.4 [In order to support counties in the effort to maximize existing resources and collaborate with other providers of early childhood education, no less than 50% of the classrooms for eligible children must be provided through contracts 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 or cannot meet the mandates of this policy.	N	- 20 is the maximum	

	(Continued)	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 community settings. This ratio of community to public school providers can only be decreased with the written permission of both the West Virginia Board of Education and the Secretary of the West Virginia Department of Health and Human Resources. 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.] This is not a suitable policy. Private business and Public Schools, do not always have the same opinions and financial goals for students. Public teachers do not wish to go and work in the private sector and vice versa. Salaries and job postings as well as mixing job requirements would be confusing and lost between policies in the private and public domain of the schools. Why should we lose funding in years ahead if a program is successful in the public preschools just because 50% of the money has to go to the private preschools or vice versa? Counties know what can work and be advised, but should not be required to do it one way and only one way.	N	

11/18	Kathy Nichols Arnoldsburg School, Calhoun County Kindergarten Teacher	Overall the policy has promise. I saw several things that do need to happen and that would make lots of positive improvements. I do think that a systematic approach to instruction with unified curriculum goals are a must. I have a concern though with the rapid certification of those with inadequate training trying to facilitate these goals. I'm not sure that it is fair to expect such sweeping change to occur in the time frame stipulated. Busing in rural areas is also an issue. Rural counties can not fund a mid-day bus run for this program. Most parents could not bring their children to a program site. Therefore, I'm afraid there would be students who would not receive service. Calhoun County (Arnoldsburg School) offers a preschool handicapping program that is full day for two days. This works for our rural area to do this because of the busing situation and provides more instructional time than a 3 day 1/2 day program would. The program has a M-W, T-TH, grouping with 3yr. olds on Friday. I personally don't think that this policy would serve our children in this economically strapped rural area as well as what we are doing right now. I want to stress my concerns as follows: 1. busing; 2. staff that is trained; 3. a unified adopted curriculum; and 4. adequate time to bring about successful change.			
11/21/02	Ralph Paugh, Director of Elementary Schools Wood County Schools 1210 13 th street Parkersburg, WV 26101 304-420-9670 Ex. 165 Fax: 304-420-9513	I believe that the oversight alone of the program is unwieldy given that both the DHHR and DOE have this responsibility. Oversight needs to be the responsibility of only one agency, which may help to eliminate the unneeded bureaucracy to effectively interpret the policy for those who must implement the program.	N		based on 18-5-44

	(Continued)	126-28-3 Contracted Programs – The meaning of what constitutes a contract needs to be clarified. Is this for the purpose of providing funds to the contracted program or is it for oversight purposes to make sure that program requirements are being met. Other questions, which need to be clarified, are: 1. If federal or state dollars are used to support a private or church related program can they continue to teach church doctrine? 2. Who oversees the certification process for employees in the contracted programs? 3. Will there be a standard of evaluation for both the program and the employees who work at the various program sites? Will policy 5310 apply to all teachers and administrators in these programs? And etc..... 126-28-6	N N N	o question based on 5202 local decision as clarified throughout policy	

	(Continued)	126-28-6 6.4 Questions arise relative to 50% of eligible classrooms provided through contracts with community programs. Community programs may or may not exist in particular counties. In larger populated counties existing community programs may choose not to participate. In less populated counties there may not be enough agencies or appropriate locations, other than the local schools to house the Pre-k programs. In addition, should some providers who wish to participate in the county plan have a faith or other philosophical basis for their program and attract only those few children whose parents wish them to have that particular training. The majority of the parents may wish their children placed in the public schools pre-k programs requiring the schools to house more than the 50% allowed. 6.4 50% eligible Classrooms: This portion of the policy should be changed to reflect a cooperative effort but the 50% figure of programs outside the county school system should be removed. Instead a requirement could be inserted that outside agencies who do not wish to participate would sign a "waiver" of participation.	A	flexibility and phase in allowed in 6.4

	(Continued)	126-28-9.1 Public schools should not be monitored by the DHHR or any other agency. Certainly those agencies should have input into what constitutes a good Pre-K program relative to the social, emotional, and childcare issues. If the public school system is required to have Pre-kindergarten and the oversight of same, curriculum standards created need to be added to (policy 2510) and then addressed by OEPA through the accreditation process. Other standards determined could be added to this process as well. 126-28-12.1.6 The placement of students in prekindergarten classes should not be left as an open enrollment. The bussing of children across counties could take inordinate amounts of time. Children could be on busses beyond the capabilities of their developmental age. Any program, private, public or parochial which uses public funds will become a public supported program, which would require transportation. Is this what is intended. Parents requesting alternate placement should be allowed as long as parents provide transportation. 126-28-15.1 Transportation of special education students should be related to the IEP. 126-28-18.6 Classroom space requirements should be specified to exclude storage furniture and other furniture that teachers want to put in the room. There can be a perfectly good space available that meets the requirements with some modifications. Sometimes teachers want to pack it with things that are not really relevant to the program.	N	O	added
			N		see section 9

11/14	Andy Bremer Arnoldsburg School	I had heard rumors about this policy and some of it's ramifications. Particularly notice sections on qualifications(18yrs, 0-1year experience teaching Head Start/child care org, HS diploma) These people will become certified teachers, and be incorporated in our pay scale and seniority systems, as per current discussions. Our aides/paraprofessionals have more training! Also notice, the expectations for programs. I am not in favor of a person that has taught Headstart/Daycare becoming certified teachers in WV. I have taught 17 years and still working on a master's.	N	general comment

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Alice Tenney
Title: Principal Business: Belington Elem School
Street Address: Rt. 2, Box 344
City/State/Zip: Belington, WV 26250

COMMENTS/SUGGESTIONS

§126-28-1. General.

§126-28-2. Guidelines.

§126-28-3. Definitions

Our program is every other day. It would be difficult to schedule our building space any other way. We use Title I money for preschool - is that okay.

FISCAL NOTE WORKSHEET (Submit 4 Copies)

HD NO _____ DRAFT NO _____ BILL NO _____ RESOLUTION NO _____
 SUBJECT Policy 2525 West Virginia's Universal Access to Pre-kindergarten 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 to the state through the school aid funding formula of fully implementing the West Virginia Pre-K System by 2012-2013 under West Virginia Code §18-5-44, is estimated to be \$48,823,301 over the next ten years. A large portion of this funding will be provided by existing formula money. New state aid formula funding dollars will primarily be needed only in the counties with increasing enrollments. As per the mandate of that code, resources from federal Head Start funds, Temporary Assistance to Needy Families (TANF)/Child Care Development Fund (CCDF), and start up funds through Title I of ESEA (now No Child Left Behind) will be fully utilized and are estimated to currently equal approximately \$41,000,000. The additional cost for Department staff is estimated to be \$250,000 for full implementation.

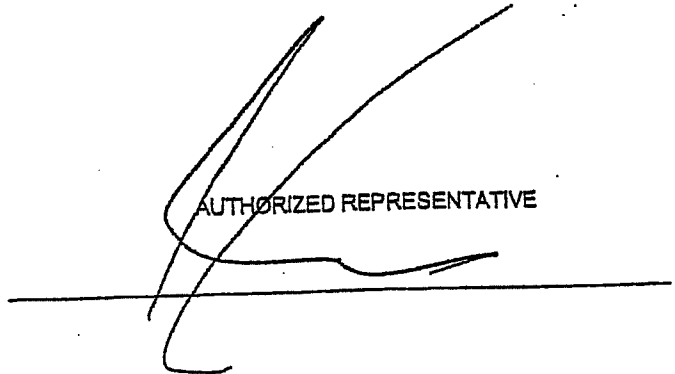
DATE

AGENCY

AUTHORIZED REPRESENTATIVE

10/03/02

West Virginia Department of Education



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

§126-28-5. Attendance. I have found it difficult to work effectively with Head Start. Our preschool follows school rules and guidelines which are much more rigid than Head Start - our calendars don't even match.

§126-28-6. Collaboration and the County Plan. ¹²
Our special class of preschool disabled children is small and the teacher follows each child's IEP. It meets these children's needs much better than our larger (20 student) preschool class.

Please Mail the Completed Comment Form to:
Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Lisa Martin

Title: Director of Special Education Business: Jackson County Schools

Street Address: P.O. Box 770

City/State/Zip: Ripley, WV 25271

COMMENTS/SUGGESTIONS

§126-28-1. General.

§126-28-2. Guidelines.

2.1.6 - Pre-K content standards and objectives will need to be developed.

2.1.7 - It would appear that this standard (employ staff with strong professional education preparation in child development and early childhood education) is not met by allowing the same permit for 2-year AA degrees (9.2.3) as that granted to PS special needs and elementary education teachers with four year plus degrees.

2.1.11 - It is my understanding that the recommended class size is 20 children with one teacher and one paraprofessional/aide. The current caseload for PS Special needs is eight students per session with one teacher and aide. While eligible special needs students are to be included in regular programs under this policy, it would be difficult to manage a student or students with severe delays/disabilities with the higher pupil teacher ratio. Allowable caseloads for special needs students in an inclusive setting would need to be established.

§126-28-3. Definitions

3.1 It would be difficult to administer the financial aspect of an educational program supported by funding through outside agencies such as Head Start. Specific guidelines must be provided regarding obligation and expenditure of blended funding.

3.2/ Assurance statements from other agencies or private providers that all requirements of the policy are met in order to be an approved provider are not adequate to ensure either provider qualifications developmentally appropriate curriculum, or appropriate facilities.

3.4 Demographics collected for June 03 plan will be irrelevant regarding the four year old population in 2013-14. It is impossible to project the number of four year old children beyond Fy 07.

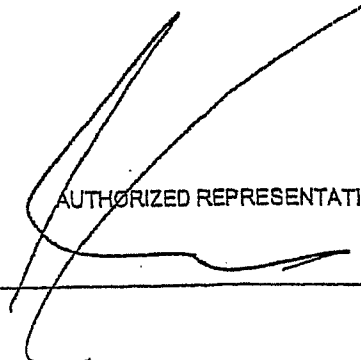
3.7 Schools should have the flexibility to implement programs within a minimum number of hours per week. Three consecutive days limits the number of students who can be served. We currently implement a PS Special Needs program on a two-day/three-day split. Those students who have two days one semester have three days the next semester and vice versa. We believe that this service delivery model, provided in two or three consecutive days, provides more total service time than three consecutive half days.

FISCAL NOTE WORKSHEET
(Submit 4 Copies)

HD NO _____ DRAFT NO _____ BILL NO _____ RESOLUTION NO _____
SUBJECT Policy 2525 West Virginia's Universal Access to Pre-kindergarten 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 to the state through the school aid funding formula of fully implementing the West Virginia Pre-K System by 2012-2013 under West Virginia Code §18-5-44, is estimated to be \$48,823,301 over the next ten years. A large portion of this funding will be existing formula money. New state aid formula funding dollars will primarily be needed only in the counties with increasing enrollments. As per the mandate of that code, resources from federal Head Start funds, Temporary Assistance to Needy Families (TANF)/Child Care Development Fund (CCDF), and start up funds through Title I of ESEA (now No Child Left Behind) will be fully utilized and are estimated to currently equal approximately \$41,000,000. The additional cost for Department staff is estimated to be \$250,000 for full implementation.

DATE 10/03/02 AGENCY West Virginia Department of Education
AUTHORIZED REPRESENTATIVE 

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

§126-28-5. Attendance.

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

While I applaud the initiative to provide access to all four year olds who may currently not be receiving services, the requirement of contracting a minimum of 50% to other providers is ludicrous. I agree that collaboration with other agencies is a must; however, providing employment and equitable salaries to unqualified or under qualified providers in an effort to support their programs is a disservice to children and families.

Please Mail the Completed Comment Form to:
Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268


FAX**CONFIDENTIAL**

TO: Dr. Cathy Jones
558-6268

FROM: Brenda Isaac RN
Lead School Nurse
Kanawha County Schools
200 Elizabeth St.
Charleston, WV 25311
Phone: 304-348-6694
Fax: 304-348-7737

DATE: November 21, 2002

PAGES: 3 (including this cover sheet)

COMMENTS: Dr. Jones, I am sending my comments on the Health sections of Policy 2525. Don't hesitate to call if you have any questions. Thank you for taking the time to meet with us and discuss this important issue. Brenda Isaac.

Policy 2525

Page 25 of 30

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Brenda C. Isaac, R.N.
Lead School Nurse

Title: Business: Kanawha County Schools

Street Address: 200 Elizabeth Street

City/State/Zip: Charleston, WV 25311

COMMENTS/SUGGESTIONS§126-28-1. General.

§126-28-2. Guidelines.

§126-28-16. Program Oversight.**§126-28-17. Financing.****§126-28-18. Health and Safety.**

18.9 - Immunizations - West Virginia Bureau for Public Health needs to develop specific legislative rules on 4-year-old preschool entry and have those available for all of these programs. These should include time lines for implementation.

18.10 - Health Screenings - The screening mandate is excellent but should have wording on required follow-up to insure that detected problems are corrected. Minimum training for anyone performing screenings should also be included.

When facilities are outside of the school systems, there should be mandated guidelines on transition into kindergarten.

What safeguards are in place for children with health concerns? Programs operated by county boards should comply with §18-5-22.

§126-28-19. Program Evaluation.

✓
TAG

A FAX FROM

RCCAA HEAD START



PO Box 3066 East Beckley Station
Beckley, WV 25801
Phone 304-252-0688
Fax 304-255-9342

CONFIDENTIALITY

This fax is confidential and intended solely and exclusively for the individual identified below. If the recipient of this fax is not the individual identified below, please immediately notify RCCAA Head Start by telephone; please do not read, copy, distribute, or disseminate this fax; return immediately to the address set forth above by regular US Mail.

DATE: November 21, 2002TO: Cathy R. JonesNO. PAGES INCLUDING COVER: 5FROM: Angela Maxey - Adkins - Raleigh Co. TADPOLERE: POLICY 2525 CommentsCOMMENTS: _____

If you do not receive all pages of this fax, please call our office at the number shown above. Ext.

POLICY 2525: West Virginia's Universal Access to Pre-Kindergarten System**Individual/Organization:** Raleigh County TADPOLE Team, an FRN Committee

Angela Maxey-Adkins, RCCAA Head Start
Ann Darby, Raleigh Co. BOE PSN Program
Carol Humphrey, Raleigh Co. Title I/LNCB

Monica Dozier, Raleigh Co. BOE Even Start
Ruth Hurt, Raleigh Co. PERC
Elizabeth Wilson, Raleigh Co. FRN

Title: Angela Maxey-Adkins **Business:** RCCAA Head Start**Street Address:** 299 Gray Flats Road**City/State/Zip:** Beckley, WV 25801

COMMENTS/SUGGESTIONS
§ 126-28-1. General.
§ 126-28-2. Guidelines
§ 126-28-3. Definitions

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

We agree that parent involvement and family support is critical to successful child development during this time of life. WV Pre-K would not be successful without strong parent involvement.

§ 126-28-5. Attendance.

There are general concerns within the early childhood community that the language of this policy may lead to children who present challenging behaviors being 'disenrolled' from programs, not to the child's benefit but to the program's benefit. Please refer to ADA and existing childcare/pre-school policies and/or court cases pertaining to this area.

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

6.5 – 6.7 – If there is an existing early childhood collaborative team, this team must be utilized in developing the county plan. We suggest that where-ever possible, it is required that the county FRN (an objective entity) take the lead in facilitating county plans, instead of an agency with a vested interest.

§ 126-28-7. Waivers**§ 126-28-8. Personnel Standards.**

We feel that the language of this section deems Preschool Special Needs Teachers as unqualified to teach in the proposed inclusive four-year old classrooms without additional certification. Preschool Special Needs Teachers are qualified to teach in inclusive four-year old classrooms without additional coursework or additional requirements.

§ 126-28-9. Regulation of Facilities.

§ 126-28-10. Standards for Preparing Students.**§ 126-28-11. Curriculum and Assessment.**

The guidelines are developmentally appropriate and reflective of best practice. We support the use of technology as a support but not as a substitute for effective teaching and an appropriate curriculum.

§ 126-28-12. Transition and Continuity.

The proposed transition to Kindergarten is a good plan in theory. In reality, given the transient nature of many families, and the occurrence of special situations, the actual Kindergarten enrollment may not be known until fall.

An effort to minimize settings would be very beneficial to children.

§ 126-28-13. Inclusive Environments.

We support the policy's statements regarding inclusive environments.

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

Requirements need clarification. This appears to increase the current number of hours required and does not appear to allow for other state requirements.

§ 128-28-15. Transportation.

It may not be immediately feasible for county systems and private/public agencies, such as Head Start, to implement TransporTots. Additional funding should be made available to enable programs to meet this requirement.

§ 126-28-16. Program Oversight.**§ 126-28-17. Financing.****§ 126-28-18. Health and Safety.**

Many existing Elementary classrooms will not meet the classroom size requirements. The caseload suggestion does not reflect the potential needs of individual children served in an inclusive setting. The maximum caseload should be reduced to allow for implementation of high quality services. This guideline does not reflect the desire for quality. The dental health screening is a great idea. What resources could be tapped to make this a reality?

§ 126-28-19. Program Evaluation.

We are concerned that the guidelines limit the tool for evaluation to one provider. Will programs be given a list of resources to use (in addition to ECERS) for on-going evaluation of their plan?

Please Mail the Completed Comment Form to:

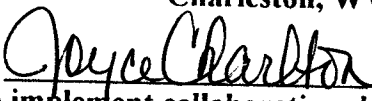
Cathy r. Jones, Ed. D., Coordinator, Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us
Fax No: (304) 558-6268

Executive Summary
West Virginia's Universal Access to Pre-kindergarten System (WV Pre-k)
Policy 2525

This is an outline of specific issues of Policy 2525. Please read this information and in your own words make your public comments by email to ctrjones@access.k12.wv.us or by mail :

Cathy R. Jones, Ed.D., Coordinator, Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, WV 25305-0330

I,  support these policies because I strongly believe that to implement collaborative classrooms these minimal standards must be met.

126-28-3 Definitions.

Page 3

3.7 – Minimum program availability means offering each preschool class a minimum of three consecutive days/week for at least three and one half hours per day during the school year calendar.

Head Start Program Performance Standards and Other Regulations

Section 1306 – Page 249 - 250

1306.32 Center-based program option.

The Standards require that classes must operate for a minimum of three and one-half hours to a maximum of six hours per day with four hours being optimal and that the classes operate a minimum of four days per week. In collaborative partnerships operating days may be negotiated to a minimum of three.

I believe that at a minimum four year old Pre-k classrooms should operate three consecutive days a week and for no less than three and one-half hours each day.

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

Page 3

I believe the section of this policy should be strengthened to include: requiring each county plan to address how they will work with each family in the areas of Literacy, Parenting, Employment, and Wellness so that parents/guardians skills can be strengthened as children transition into Kindergarten.

126-28-6 Collaboration and County Plan.

Page 4

6.4 –In order to support counties in the effort to maximize existing resources and collaborate with other providers of early childhood education, no less than 50% of the classrooms for eligible children must be provided through contracts 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 or cannot meet the mandates of this policy. This may not be construed to mean that counties will provide education services in public school settings only and contract out support services both rather that 50% of the classrooms for eligible children must be contracted with qualifying providers in community settings. This ratio of community to public school providers can only be decreased with the written permission of both the West Virginia Board of Education and the Secretary of the West Virginia Department of Health and Human Resources. 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.

Head Start and Child Care have developed licensed classrooms set apart from local public school district's Pre-School programs. I support that a minimum of 50% of the four year old classrooms be contracted to community programs meeting the standards in this policy to provide the classroom space, qualified staff and financial resources to the meet the goal. There will be ample opportunities through county plans to bring public school staff and their resources out into the community to support the community classrooms.

126-28-8 Personnel Standards.

Page 6

8.1. Teachers must hold a qualifying certification/endorsement for teachers, specifically, early education, Prek-k endorsement, or birth to five.

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 January 1 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 126CSR136, West Virginia Board of Education Policy 5202 - Minimum Requirements for the Licensure of Professional/Paraprofessional Personnel and Advanced Salary Classification, Section 15. Full time permits will be issued for:

8.2.1. persons with degrees in preschool special needs, elementary education, child and family studies with an emphasis on early childhood education, or child development, or

8.2.2. persons with a Board of Regents degree with a specialization in early childhood/child development, or

8.2.3. persons with an AA in child development/early childhood or occupational development with an emphasis on child development/early childhood and one year of early education teaching experience.

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 West Virginia State Registry and Training System (WV STARS) 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 0-1 years of experience and possess the ability to understand and practice the core competencies with direction and instruction or through sponsorship of a professional organization or qualified mentor. (Attached). Aides and assistants must have an individualized staff development plan for specifying his/her planned progression on the career pathway toward level V.

I strongly support sections 8.2 through 8.3 for qualifications and the full-time permit to assure qualifying certification/endorsement of personnel.

126-28-11 Curriculum and Assessment

Page 7 – Specific issues addressed in this area need to be/remain incorporated in the planning process for curriculum and assessment of four year old children.

The curriculum must be developmentally appropriate-not “watered-down” kindergarten/1st grade curriculum.

Components that must be incorporated included: whole child curriculum, emerging skills, pre literacy skills, continuum of development, readiness program and Transition.

I believe it is vital to the educational success of the child that parents/guardians are encouraged to participate in the child's learning experience as much as possible.

126-28-9. Regulation of Facilities and 126-20-18 Health and Safety.

Page 7 - 9.1. All approved participating WV Pre-k programs, see definitions, that are included in the county collaborative plan must meet the requirements as set forth in the West Virginia Division of Health Legislative Rules Child Care Centers 64CSR21 or any rule promulgated to replace and/or update 64CSR21. Public schools or other programs who are exempt under West Virginia Division of Health Legislative Rules Child Care centers 64CSR21 or its replacement must meet the requirements set for in that rule. In the case of public schools, West Virginia Department of Health and Human Resources Child Care Licensing staff will conduct monitoring and any recommendations for action made to the Office of Education Performance Audits.

Page 14 - 18.1. WV Pre-k classrooms must be provided in buildings or structures that are of sound structure and maintained in good repair.

18.2. WV Pre-k classroom facilities shall be equipped with approved heating units sufficient to provide a temperature of at least sixty-eight degrees Fahrenheit (68F) at floor level in all rooms used by children.

18.3. All buildings or structures housing WV Pre-k classrooms shall be of rat-proof construction and free of insects and rodents.

18.4. Toilet fixtures for all WV Pre-k classrooms shall be sized so that they may be used by children without assistance, or provide step stools and/or modified toilet seats that are safely constructed and can be easily used in lieu of specially sized toilet fixtures.

18.5. Lavatories in WV Pre-k classrooms shall be provided in or immediately adjacent to all toilet room. Lavatories shall have mixing faucets or be provided with tempered water. All lavatories shall be provided with soap and single services sanitary towels.

18.6. WV Pre-k classrooms shall provide useable floor space of at least thirty-five square feet per child shall be provided and available for children's activities, exclusive of halls, bathrooms, the kitchen, office space, or storage areas. Useable outdoor play space of seven-five (75) square feet per child shall be provided.

18.7. WV Pre-k classrooms shall limit classroom size to no more than twenty children per classroom. Ratios shall be maintained at 1 adult: 10 children with one adult being a certified teacher in accordance with §126-28-8, Personnel Standards.

18.8. 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 West Virginia Department of Education child and adult food program. Programs operating less than four hours will provide a snack as prescribed the West Virginia Department of Education child and adult food program.

18.9. Immunization. All children entering an approved participating WV Pre-k classroom that is participating in the county collaborative plan shall follow the guidelines of the primary (providing 51% or more of the funding that year) funding source regarding immunization. Participating programs that operate within a public school facility must follow West Virginia Code §16-3-4.

18.10. Health Screenings. All children entering an approved participating WV Pre-k classroom that is participating in the county collaborative plan shall screen children 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 West Virginia Code §18-5-17.

Performance Standards 1304 and 1306 - According to Head Start Performance Standards Head Start programs must meet the most stringent of regulations for the Safety

and Health of enrolled children -- by meeting State Licensing Regulations or the Head Start Performance Standards at a minimum. The Regulation of Facilities and the Health and Safety areas of this Policy are minimal requirements to meet.

I support requiring all programs serving four year children in a pre-k setting to meet the West Virginia Department of Health and Human Resources Child Care Licensing Regulations. I also support OEPA of the State Department of Education in enforcing any correctional action plans identified through the Department of Health and Human Resources monitoring process.

Comments/Suggestions Regarding
WVBOE Policy 2525

Individual: Carl Mace
P.O. Box 333
St. Marys, WV 26170

- 126-28-1. General
1.1. Scope. Please reference the Federal code by number.
1.2. All participating agencies should follow the most stringent in effect for all component area of Policy 2525.
- 126-28-2. Guidelines.
2.1.1. Please reference the Federal code by number.
- 126-28-4. Parent/Guardian Involvement and Family Support.
4.1.2. A minimum of one home visit per semester should be required.
- 126-28-6. Collaboration and the County Plan.
6.5 thru 6.9. County/agency pupil transportation directors have been inappropriately omitted. They are responsible for organizing pupil transportation logistics, such as building bus routes and writing schedule descriptions; coordinating school and busing schedules; as well as the transfer of students between and among other buses/other modes of transportation used to transport pupils to/from school/classroom sites. They cannot coordinate these activities without key information provided by the other entities named in 6.5. and 6/6, in order to meet the requirements of 6.9.
Additionally, it needs to be noted the height of the first step (riser) on a full sized school bus may not exceed 14 inches. Can these three and four year old children deal with such.
- 126-28-7. Waver
A number of small, rural West Virginia counties will have little difficulty meeting Requirements 7.1.1., 7.1.2., 7.1.3., and 7.1.4.

No safeguards appear to be in place to prevent a county from selling school buildings no longer in use or expending marginal financial surpluses so as to ensure that it will receive a waiver from full implementation of WV Pre-K.

126-28-8. Personnel Standards

Regarding 8.1, and 8.2., and 8.3., a preschool SPED teacher is certified to teach all children with various typed of delays, but they are required in Policy 2525 as unable to teach a typical, developing child. Under this policy, a regular ED Pre-K Teacher with NO training in SPED does not have to be SPED certified to teach the developmentally delayed child.

Obviously, the present Policy 2525 requirements may be construed as unfair and unequal treatment of those within an occupational grouping and could be grounds for grievances/law suits.

126-28-12. Transition and Continuity.

12.1.7. Any existing policy requiring the transportation of students by the county of residence to a nearby county that provides mandated service not offered by the county of residence, should be included and referenced by policy number in this section.

126-28-15. Transportation.

15.1. Some rural West Virginia counties must transport over 90 percent of their students to school. This section apparently assumes that all single-parent households, nationally estimated to be 40 percent of all households, have the means of transporting their three and four year olds to classroom sites and providing transportation for county and extra-curricular trips.

126-20-18. Financing.

17.1. Does this EXCLUDE the inspection of Headstart buses by WVDE School Bus Inspectors?

126-20-18. Health and Safety

18.8. U.S.D.A. guidelines should be referenced by name and code number.

Will the WV Commissioner of Agriculture provide Federally Donated Foods Inspectors to, at least annually, verify inventory and accountability; safe and proper storage, as well as identify misappropriation/theft; timely usage, and order the disposal of outdated Federally Donated Foods used by any collaborative agency involved in WV Pre-K?

18.9. Federal guidelines for Headstart agencies state that the safety and welfare of all children shall be ensured. Therefore, Headstart guidelines for immunization

of all children in these classrooms shall predominate.

18.10. Regarding the screening of children for developmental impairments/delays, what type/types of instruments shall be used for screening purposes.?

-THE END-

126CSR28

Please Mail the Completed Comment Form to:
Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

126CSR28

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

***Directions:** Please use this form to provide comments/suggestions regarding revised Policy 2525.*

Individual/Organization:

Title: Angela Madia Business: Harrison County Schools

Mailing Address: PO Box 1370

City/State/Zip: Clarksburg, WV 26302-2619

COMMENTS/SUGGESTIONS
§126-28-1. General.
§126-28-2. Guidelines.

§126-28-3. Definitions. Minimum Program Availability — For students with an exceptionality the minimum program requirement restricts the IEP committee in providing appropriate services for children based on their individual needs. Specially designed instruction must be based on meeting the students social, functional, &/or academic needs as specified in their IEPs (Policy 2419). The minimum program availability will restrict the IEP committee's ability to make decisions based on the individual child's needs. It is important to consider the needs of the student and the natural environment when determine placement options. For children with special needs a variety of placement options are provided through the IEP process; options for children 3-5 range from home as the least restrictive environment to a residential facility as the most restrictive. The minimum limitations will not provide the IEP committee the flexibility to design individual programs for children 3-5 with special needs.

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

§126-28-5. Attendance.

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

6.4 – Considered the benchmark of 50% of classroom for eligible children to be extreme. The benchmark should be reflective of the ratio of licensed childcare or Head Start programs within the community.

Recommend that Pre-school Special Needs classrooms not be aggregated in the 50% standard. The number of Preschool Special Needs classrooms is determined based upon the needs of students identified by the IEP process. It will be unfortunate if restrictions are placed on their location.

§126-28-7. Waivers.

§126-28-8. Personnel Standards.

§126-28-9. Regulation of Facilities.

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

126CSR28

§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. Transportation.

§126-28-16. Program Oversight.

§126-28-17. Financing.

126CSR28

§126-28-18. Health and Safety.

§126-28-19. Program Evaluation.

Please Mail the Completed Comment Form to:
Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

***Directions:** Please use this form to provide comments/suggestions regarding revised Policy 2525*

Individual/Organization: **Mingo County EOC, Inc. Head Start**

Title: **Management Team:** Business: **Community Action Agency**
EOC Executive Director
Director of Finance and Administration
Director of Children's Programs
Education and Training Coordinator
Family and Community Partnerships Coordinator
Health and Nutrition Coordinator

Street Address: **815 Alderson Street**
PO Box 1406
Williamson, WV 25661

COMMENTS/SUGGESTIONS
126-28-4. Parent/Guardian Involvement and Family Support. Suggest inclusion of specific terminology relative to adult literacy, enhancing parenting strategies, family goal setting, etc. If families have a plan that will enable them to grow, the child and families' transition and participation into public school will be more beneficial to all
126-28-6. Collaboration and the County Plan. GREAT! This stipulation is ensure the opportunity of all programs to participate in this program in an ACTIVE manner. This will enable Boards of Education opportunities to provide services even though there is limited funding and/or facilities. This will also enable the public school system to become more a part of the communities. In addition, children and families will enjoy a wider range of services available to their families, better communication with public schools and less resistance to participation in public school programs.
126-28-8 Personnel Standards. YES! This section provides for everyone – it ensures that teachers are qualified with certifications relevant to the group of children served and it allows a place for those attempting to become certified. It is so important that staff be well-versed in early childhood development in order to appropriately provide for very young children.

126-28-9. Regulation of Facilities

This mandate has been needed for a long time. It is only logical to expect that ANY agency offering services to young children must be of high quality in relation to curriculum as well as facilities. If children are in an environment that doesn't meet the minimal requirements for Child Care Centers, then, there is a definite problem. Our children deserve to attend school in an environment that is optimal to learning

126-28-10 Standards for Preparing Students.

If there is a conflict regarding different curriculum standards (Kindergarten, Head Start, WVPK), who resolves the conflict? Which one supersedes? Need clarification....

126-28-11 Curriculum and Assessment.

Like It! Keep It! This guideline provides for the development of the whole child. It is wonderful to know that "developmentally appropriate" curriculum will be mandated. It is SO IMPORTANT to ensure that children are not expected to succeed in a "watered down" kindergarten curriculum.

126-28-12 Transition and Continuity

12.1.3 GREAT! Information-sharing is a good way to ensure the best from all.

126-28-15 Transportation.

Transportation is a major deterrent to our children's participation in the program. If transportation is not mandated, the children who need it the most, will most likely, not get it because they can't get there. We must provide transportation.

126-28-18 Health and Safety.

- 18.3 Please define "rat-proof construction".... no wood buildings? Suggest using "...restricted to steel or masonry construction"
- 18.8 There is no requirement for "snacks" for extended days – Head Start standards require it.
- 18.9 Head Start helps families acquire immunizations for their children if they are not up-to-date and BOE does not accept children in the program without being up-to-date...how will this be resolved?
- 18.10 GREAT – these screenings and subsequent intervention is vital to children's ability to learn

126-28-19 Program Evaluation

Other programs may have specified evaluation tools required by funding sources (such as Head Start) and a required onsite review process (tri-annual) – must have allowance for these monitoring processes

126CSR28

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

***Directions:** Please use this form to provide comments/suggestions regarding revised Policy 2525.*

Individual/Organization: Amy R. Cibik / Wetzel County Even Start

Title: Family Educator Business:

Street Address: RR2 Box 107

City/State/Zip: New Martinsville, WV 26155

COMMENTS/SUGGESTIONS
§126-28-1. General. 3-year-olds are mentioned in this section, but not in the rest of the bill. Is this supposed to be for the year before kindergarten?
§126-28-2. Guidelines. Once again, it is unclear if this is a program for 3-year-olds, 4-year-olds, or both. 2.1.7 is vague. Any teacher should hold an early childhood degree. The No Child Left Behind legislation addresses this area.
§126-28-3. Definitions. 3.6 says an eligible child who is four by the first day of September, yet the "General" section addresses both 3- and 4-year-olds.

126CSR28

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

§126-28-5. Attendance.

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

6.4 concerns me. I do not feel that a mandated percentage is necessary. Our county has led the way with a wonderful preschool program, and other agencies have chosen not to collaborate. I feel the program, at least in this county, will be put at risk if a mandated percentage is enforced.

§126-28-7. Waivers.

§126-28-8. Personnel Standards.

8.1 I am happy to see that certified teachers will be a priority.

§126-28-9. Regulation of Facilities.

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

§126-28-11. Curriculum and Assessment.

11.6 sounds like it is someone's opinion and should not be included as policy. Trained professionals know how to do their jobs, and developmentally appropriated practices are already addressed in the policy.

§126-28-12. Transition and Continuity.

I was glad to see this included with the policy.

§126-28-13. Inclusive Environments.

13.2 Isn't Head Start income based? Will their federal guidelines override state policy?

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

126CSR28

§126-28-15. Transportation.

§126-28-16. Program Oversight.

§126-28-17. Financing.

§126-28-18. Health and Safety.

§126-28-19. Program Evaluation.

Please Mail the Completed Comment Form to:
Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

Cathy Jones

From: Donnetta Rainwater [drainwater@hotmail.com]
Sent: Thursday, November 21, 2002 8:42 AM
To: CTRJONES@ACCESS.K12.WV.US
Subject: policy 2525 comments from a teacher

MS. JONES,

IN RESPONSE TO THE MEETING ON 11-18-02 CONCERNING THE CERTIFICATION OF
TEACHERS FOR THE NEW BIRTH TO FIVE PROGRAM.

I CURRENTLY HAVE THREE TEACHING DEGREES. I HAVE K-8, GIFTED AND PRESCHOOL
SPECIAL NEEDS. TO TAKE A CLASS AT MARSHALL, I HAVE TO DRIVE 75 MILES ONE
WAY, AFTER WORKING ALL DAY FOR A TOTAL OF AT LEAST 150 MILES. I HAVE WORKED
IN PRESCHOOL SPECIAL NEEDS SINCE 1996 AND THE SCHOOL SYSTEM SINCE 1990. I
HAVE WORKED MY WAY TO A JOB I ENJOY DOING AND I WOULD LIKE TO THINK I DO A
GOOD JOB. I KNOW MY AREA, MY PARENTS AND MOST OF ALL, MY STUDENTS. I KNOW
WHAT IS EXPECTED OF ME AND HAVE ALWAYS RECEIVED GOOD EVALUATIONS FOR MY JOB.
WITH THE NEW PROGRAM OF BIRTH TO FIVE, I MUST RETURN TO MARSHALL AND TAKE
CLASSES AGAIN. AS I STATED, DRIVING 150 MILES A NIGHT (IF THEY OFFER
EVENING CLASSES) AFTER WORKING ALL DAY. I KNOW I AM NOT THE ONLY ONE WITH
THESE CONCERNS. I HAVE WORKED IN THE SCHOOL SYSTEM FOR 11 YEARS. I GUESS
WHAT I WOULD LIKE TO SEE WOULD BE IF THOSE OF US WHO CURRENTLY WORK IN
PRESCHOOL SPECIAL NEEDS COULD BE "GRANDFATHERED" INTO THIS NEW DEGREE. IT
WOULD BE SO DIFFICULT FOR ME TO OBTAIN THIS CERTIFICATION IF I HAVE TO DRIVE
TO MARSHALL. AFTER ALL, I'M 45 YEARS OLD NOW!
PLEASE ASSIST US IN ANY WAY YOU CAN SO THE STATE WILL NOW LOOSE EXPERIENCED
TEACHERS DUE TO OBTAINING THIS DEGREE.

THANKING YOU IN ADVANCE

DONNETTA RAINWATER

PRESCHOOL SPECIAL NEEDS INSTRUCTOR

LOGAN COUNTY SCHOOLS

DRAINWATER@HOTMAIL.COM

304-792-2087 WORK

304-752-3528 HOME

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Vicki Moss

From: Cathy Jones [ctrjones@access.k12.wv.us]
Sent: Tuesday, December 03, 2002 9:23 AM
To: Vicki Moss
Subject: FW: Policy 2525 Comments



Policy_2525.doc

=====
Cathy R.Jones, Ed.D.
Coordinator Early Childhood/Even Start
Building 6, Room 318
1900 Kanawha Blvd.East
Charleston, WV 25305-0330
Phone 304-558-2691
Fax 304-558-6268
ctrjones@access.k12.wv.us

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

From: Peggy Hayden [mailto:Peggy_Hayden@pop3.ids.net]
Sent: Monday, November 18, 2002 10:57 AM
To: ctrjones@access.k12.wv.us; vhuffman@access.k12.wv.us
Subject: Policy 2525 Comments

Dear Cathy and Ginger - Enclosed are comments on Policy 2525 from the WV Early Childhood Transition Steering Committee. Let me know if any questions...Peg

--
Peggy Hayden
34 Sea Breeze Lane
Bristol, RI 02809
Phone: 401/253-3275
FAX: 401/253-3952
e-mail: peggy_hayden@ids.net

**Comments on Proposed Policy 2525:
West Virginia's Universal Access to Pre-kindergarten System**

Organization Submitting Comments: WV Early Childhood Transition Steering Committee (See attached membership list. Committee members present when these comments were developed are bolded.)

Mailing Address: c/o Ginger Huffman, WV Department of Education, Office of Special Education, Building 6, Room B-304, 1900 Kanawha Boulevard, East, Charleston, WV 25305, Ph: 304/558-2696, Fax: 304/558-3741, Email: vhuffman@access.k12.wv.us

Comments/Suggestions

§126-28-1. General.

1. We applaud referring to this policy as the "Pre-kindergarten System" as opposed to the "4-year-old program". Use of the term "Pre-kindergarten System":
 - Reinforces that services provided in accordance with this policy are to be made available for 4-year-old children and 3-year-old children as mandated under federal law.
 - Is forward looking. That is, as resources become available over time on the state or local level to expand services to children age 3 and under, the term "Pre-kindergarten System" will still be an applicable title.
 - Focuses on a "system" and not a single program or component of that system. This underscores the collaborative nature of this policy related to multi-agency planning and implementation of new services building on the foundation of the Birth-kindergarten system currently in place in the county.
2. We appreciate the considerable time and effort of the many people who have created policy and resources for this program.
3. This policy reflects best practice in the early childhood field and is an important step in our state in providing quality services to young children that will enable them to achieve at high levels and ultimately become the type of citizens this state needs to progress. It is results oriented. That is, it emphasizes both the services to be provided and the desired impact of those services on children (learner outcomes).
4. We applaud the emphasis on inclusion of children with disabilities in this system in services that are not segregated because of disability. This puts the emphasis on children first.
5. Additional emphasis should be included in policy and in training that this is NOT a public school program. Although the public school is a key player, the system is based on a foundation of collaboration with participating agencies as EQUAL partners.
6. It is critical that adequate resources be allocated for supports to ensure appropriate implementation of this policy including:
 - State level training and technical assistance staff and resources to support county collaborative teams in the development, implementation, oversight and evaluation of local systems.
 - Resources that county's can tap to provide individual program and/or child supports related to planning, implementing and evaluating quality, inclusive services at the local level.

WV Early Childhood Transition Steering Committee

§126-28-2. Guidelines.

Modify (see underlining) as follows:

2.1.5 use a learning approach that reflects most effective practice based on scientific research about how four-year-olds and three-year-olds learn including those with and without special needs.

2.1.7 employ staff with strong professional education preparation in child development and early childhood education and, as appropriate, early childhood special education.

2.1.9 incorporate meaningful ways of communicating with and involving parent guardian and/or other family members as appropriate.

§126-28-3. Definitions.

Modify (see underlining) as follows:

3.1 *Approved funding sources* means any funds used directly to support WV Pre-k classrooms for eligible children including school aid formula, Head Start funds, Even Start funds, Temporary Assistance to Needy Families, Child Care Development Funds, funds under the Elementary and Secondary Education Act, funds under the Individuals with Disabilities Education Act, funds provided by the School Building Authority, and any other private or public funds. (Rationale: This underscores the intent that this be an inclusive program related to services for children with and without disabilities.)

3.6 *Eligible child* shall mean any child, regardless of ability or whether he/she is toilet trained, who is four by September 1 of the year he/she is to enroll or whose enrollment is mandated under state and/or federal law including children with disabilities who are three years old and who are eligible for enrollment as of their third birthdate in accordance with the Individuals with Disabilities Education Act, Policy 2419 and related state requirements. If it is in the best...

3.8 *West Virginia's Pre-k* means kindergarten readiness programs including, but not limited to, developmental kindergartens, four-year-old kindergarten, services for children with disabilities ages three and four, and other programs...

Additional Comment

3.7 The Committee supports this requirement, because it is based on scientific research on effective practice. The Committee realizes that implementation of this provision will be challenging and require adjustments in current services in many counties. Nevertheless, this requirement should be retained to help ensure maximum benefits related to learner outcomes for the children participating in the Pre-k system.

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

The Committee supports emphasis on this topic. It recommends that in this section and throughout the policy, whenever the term "parent/guardian" is used that it be worded as "parent/guardian and/or other family members as appropriate" - depending on context appropriateness.

Modify (see underlining and strikethrough) as follows:

4.1.3 services to children and their families necessary to support the child and family's ~~in his/her~~ transition into, participation in, and transition out of the program. Comments: How are services defined? What are expectations? A benefit of the collaboration required in the county plan is that a multi-agency approach will provide a greater array of services in this regard. Also, Webster County provides a good model.

WV Early Childhood Transition Steering Committee

§126-28-5. Attendance.***General Comment***

The Committee supports the policy proposed here.

Modify (see underlining) as follows:

Add 5.1.3 Each county must make reasonable efforts to ensure that the parent/guardian and other family members as appropriate understand about the availability of services, the attendance policy and the benefit of early childhood education.

§126-28-6. Collaboration and the County Plan.***General Comment***

The Committee supports the policy proposed here (see general comments at the beginning of this document).

Modify (see underlining) as follows:

6.5 The county collaborative planning team must include at a minimum a representative from: the county school system preschool program, the county school system preschool special needs program, ~~a~~-licensed community child care programs in that county not operated by the county school system (all non-county school system child care programs must be given the option of participating), the Head Start program in that county, the local department of health and human resources, and a parent guardian and/or other family members of a preschool child. Agencies represented on this team shall operate as equal partners.

§126-28-7. Waivers.

No comments.

§126-28-8. Personnel Standards.***General Comment***

The Committee supports the policy proposed here, because personnel qualifications are key to quality services. Information needs to be made available related to options through which persons in the field can meet these requirements. The Committee is particularly glad to see reference to WV STARS.

Modify (see underlining) as follows:

8.3 Modify the final sentence to read: Aides and assistants must have an individualized staff development plan for specifying his/her planned progression on the career pathway toward level V within 5 years.

§126-28-9. Regulation of Facilities.

No comments.

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

The Committee supports the policy proposed here, because it is results oriented, reinforcing learner outcomes so key to ultimately producing educated citizens. It also underscores interagency collaboration and program continuity as children transition from one program to another.

§126-28-11. Curriculum and Assessment.

The Committee supports the policy proposed here, because it is reflective of scientific research on effective practice.

§126-28-12. Transition and Continuity.

General Comment

The Committee supports the policy proposed here, because it is reflective of scientific research on effective practice.

Modify (see underlining and strikethrough) as follows:

* 12.1 Each program participating in the county plan must have a written and implemented plan for transition children into the Pre-k System and out of Pre-k services into kindergarten...

12.1.1 an opportunity for the child and his/her family to visit the setting into which the child is transitioning, i.e., Pre-k System or kindergarten classroom.

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 the Pre-k or kindergarten.

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

12.1.5 policies and procedures for the transition of children with Individualized Education Programs out of the Pre-k System and into kindergarten. ~~will utilize this transition process as guidelines for the transition of children established in 3.1.1 of this policy.~~ What is 3.1.1 of this policy?

Add 12.1.8 policies and procedures for the transition of children with disabilities and their families from the WV Birth to Three System to the Pre-k System in accordance with state and federal requirements. (Renumber this provision, placing it prior to 12.1.5.)

§126-28-13. Inclusive Environments.

The Committee supports the policy proposed here, because it is reflective of scientific research on effective practice.

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

General Comment

The Committee supports the policy proposed here, because it is reflective of scientific research on effective practice.

Modify (see underlining) as follows:

14.1 Each county plan will...inclusive environments and children with special needs.

§126-28-15. Transportation.

Modify (see underlining) as follows:

15.1 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.

§126-28-16. Program Oversight.

General Comment

The Committee supports the policy proposed here. It strongly encourages the allocation of sufficient fiscal and staff resources to adequately implement these provisions.

WV Early Childhood Transition Steering Committee

§126-28-17. Financing.

No comment.

§126-28-18. Health and Safety.

No comment.

§126-28-19. Program Evaluation.

General Comment

The Committee supports the policy proposed here, because it is reflective of scientific research on effective practice.

Modify (see underlining) as follows:

Add 19.5 The state shall develop and institute a system of longitudinal, scientific-based research to track learner outcomes, family satisfaction, program continuity and related variables in order to evaluate program impact. The system shall be designed in such a way to be of benefit on both the county and state level.

WV Early Childhood Transition Steering Committee

WV Early Childhood Transition Steering Committee

Committee members attending the meeting at which these comments were developed are bolded.

Linda Bond 1116 Fairfax Street Fairmont, WV 26554 Home: Ph: 304/366-1923 Marion County Schools: Ph: 304/367-2156; Fax: 304/367-8976 Email: lindsaybond@aol.com	Kay Carpenter, Superintendent Webster County Schools 315 South Main Street Webster Springs, WV 26288 Ph: 304/847-5638; Fax: 304/847-2538 Email: lcarpent@access.K12.wv.us
Annette Carey WV Deafblind Project WV Department of Education Office of Special Education Building 6, Room B-304 1900 Kanawha Boulevard, East Charleston, WV 25305 Ph: 304/558-2696; Fax: 304/558-3741 Email: acarey@access.K12.wv.us	Traci Cramer Child Care Resource Center 1025 Main Street Suite 510, Mull Center Wheeling, WV 26003 Phone: 304/232-1603 Email: tracicramer@wvdhhr.org
Judy Curry Office of Social Services Child Care Division 350 Capitol Street Charleston, WV 25301-3714 Ph: 304/558-7980; Fax: 304/558-8800 Email: jcurry@wvdhhr.org	Nancy Drake Parent Coordinator WV Department of Education Office of Special Education Building 6, Room B-304 1900 Kanawha Boulevard, East Charleston, WV 25305 Ph: 304/558-2696; Fax: 304/558-3741 Email: ndrake@access.K12.wv.us
Alyson Edwards WVECTCR River Valley Child Development Services 605 9th Street, Suite 319 Huntington, WV 25701 Ph: 888/983-2827; Fax: 304/529-2535 Email: wvtrainingta@aol.com	Kathy Hamrick WV DSQIC Office PO BOX 2308 Westover, WV 26502 Ph: 304/292-0258; Fax: 304/292-1398 Email: khamrick@westco.net
Cathy Jones Early Childhood Coordinator/Even Start WV Department of Education 1900 Kanawha Blvd., Building 6, Room 318 Charleston, WV 25305 Ph: 304/558-2691 ext. 264 Email: ctrjones@access.k12.wv.us	Bill Huebner Governor's Cabinet on Children & Families 210 Brooks Street, Suite 300 Charleston, WV 25301 Ph: 304/558-4638; Fax: 304/558-0596 Email: bhuebner@mail.wvnet.edu

WV Early Childhood Transition Steering Committee

Ginger Huffman WV Department of Education Office of Special Education Building 6, Room B-304 1900 Kanawha Boulevard, East Charleston, WV 25305 Ph: 304/558-2696; Fax: 304/558-3741 Email: vhuffman@access.K12.wv.us	Kathy Knighton WV Department of Education Office of Special Education Programs Building 6, Room B-304 1900 Kanawha Boulevard, East Charleston, WV 25305 Ph: 304/558-2696; Fax/304/558-3741 Email: kknighto@access.K12.wv.us
Kay Nesselrotte North Central WV Head Start 213 Jackson Street Fairmont, WV 26554 Ph: 304/363-6869 ext. 110 Email: knesselrotte@ncwvcaa.org	Joann Richards RESA VIII 109 S. College Street Martinsburg, WV 25401 Ph: 304/267-3595; Fax: 304/267-3599 Email: mjrriacha@access.k12.wv.us
Pam Roush Bureau for Public Health Office Of Maternal, Child & Family Child Health WV Birth to Three 350 Capitol Street, Room 427 Charleston, WV 25301-3714 Ph: 304/558-6311; Fax: 304/558-4984 Email: pamroush@wvdhhr.org	Jim Smiley Coordinator of Special Education RESA VII 1201 N. 15 th Street Clarksburg, WV 26301-1936 Ph: 304/367-1431 and 304/624-6554 Email: jsmiley@access.K12.wv.us
Donna Taylor, Disabilities Coordinator Child and Family Development Head Start 1100 Monroe Huntington, WV 25704 Ph: 304/697-4600; Fax: 304/525-9685	Barbara Tucker River Valley Child Development Services 605 9th Street, Suite 215 Huntington, WV 25701-2139 Ph: 304/523-3417 x213; Fax: 304/523-2678 Email: BIBBYTUCK@aol.com
Mel Woodcock Bureau for Public Health Office Of Maternal, Child & Family Child Health WV Birth to Three 350 Capitol Street, Room 427 Charleston, WV 25301-3714 Ph: 304/637-0370 & 304/558-0511; Fax: 304/637-0371 Email: melwoodcock@wvdhhr.org	Peggy Hayden (Committee Facilitator) 34 Sea Breeze Lane Bristol, RI 02809 Ph: 401/253-3275; Fax: 401/253-3952 Email: peggy_hayden@ids.net

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

J
TAG

Individual/Organization: April V. Puzzuoli, Ed. D.

Title: Professor of Early Childhood Education

Business: a. Concord College

b. WWAYC

Street Address: PO Box 1000

City/State/Zip: Athens, WV 24712

COMMENTS/SUGGESTIONS§126-28-1. General.

§126-28-2. Guidelines.

2.1.5 applies to four-year-olds yet 2.1.1 states that three-year-olds mandated under federal law are eligible to participant. 2.1.5. should be expanded to include these three-year-olds.

§126-28-3. Definitions.

The language that we use conveys a great deal of meaning about what it is that we do. 3.8 mentions "four-year-old kindergartens", when in actuality kindergartens are for five-year-olds. If we use different terms to refer to children and programs for them, we assist the general public to understand the differences in our expectations for three- and four-year-old versus those for five-year-olds.

§126-28-4. Parent/Guardian Involvement and Family Support.**§126-28-5. Attendance.****§126-28-6. Collaboration and the County Plan.**

Because the guidelines for development of the county plans have not been finalized, the initial plan due date of June 27 does not provide adequate time for communities to participate in collaboration across agencies that is needed for the task before them.

The list of recommended members on the county collaborative planning team is very comprehensive.

§126-28-7. Waivers.**§126-28-8. Personnel Standards.**

There need to be a statement clarifying that only certified teachers will be able to teach in the public school settings and those working on certification can teach in the community-based programs.

8.1 should include early childhood special education, if the teacher has certification in Early Education as is possible with the Concord College Program.

8.2 a time length, such as 5 years, should be specified for minimum requirements for licensure (end of paragraph).

8.2.2 should, also, include graduates with an Interdisciplinary degree if there is specialization in early childhood/child development.

§126-28-9. Regulation of Facilities.

9.1 should state that participating Montessori or other private preschool programs participating must also meet day care licensure standards.

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

Curricular alignment with the kindergarten content standards and objectives should be omitted yet leave in the statement "supports successful transition into kindergarten." It is important that all concerned understand that the pre-

kindergarten program and curriculum is different from that of the kindergarten.

§126-28-11. Curriculum and Assessment.

The curriculum and assessment section of the Policy is presenting a very sound curriculum and assessment system, which will be developmentally and individually appropriate. There is a significant body of research to support what is included in this section.

§126-28-12. Transition and Continuity.

Policy outlined is highly appropriate for best practices as detailed in the literature.

§126-28-13. Inclusive Environments.

Sound practices are recommended.

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

This section promotes ongoing staff development needed to maintain a high quality workforce.

§126-28-15. Transportation.

Many children who could benefit from the services will not be able to participate as long as transportation is not provided.

§126-28-16. Program Oversight.

§126-28-17. Financing.

Full Legislative financial support for Pre-kindergarten services is essential to provision of high quality services that are developmentally appropriate.

§126-28-18. Health and Safety.

This section is within acceptable practices for high quality early childhood programs.

§126-28-19. Program Evaluation.

The ECERS instrument requires a considerable amount of time to administer. Requiring self-evaluation with state monitored spot-checking would be reasonable once sufficient individuals are trained in use of it.

✓
AC

FAX TRANSMISSION

HARRISON COUNTY BOARD OF EDUCATION
P. O. Box 1370
Clarksburg, WV 26302-1370
(304) 624-3325
Fax: (304) 624-3361

To: Cathy R. Jones, Ed.D.

Fax #: (304) 558-6268

From: John Babajek

Date: 11-21-02

Page 1 of 4

Comments: _____

If you do not receive all pages, please call us at (304) 624-3325, ext. 3344.

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System**COMMENT PERIOD ENDS: November 20, 2002**

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: John T. Babyak, Harrison County Board of Education

Title: Administrative Assistant Business: _____

Street Address: 408 E. B. Saunders Way - P.O. Box 1370

City/State/Zip: Clarksburg, WV 26302-1370

COMMENTS/SUGGESTIONS
§126-28-1. General. Applaud the intent to make consistent preschool opportunities available.
§126-28-2. Guidelines. Approve the intent to provide developmentally appropriate environments to all children.
§126-28-3. Definitions. 3.7 Minimum program availability The length of a day for both WVDE & WVDHHR should be identical. If not, then a 3½ hour day is too long for personnel purposes. Teachers may not exceed an 8 hour day. The seven hours of instruction does not allow for lunch, planning and travel time.
§126-28-4. Parent/Guardian Involvement and Family Support. 4.1.2 Documented methods of communicating with parent/guardian "which may include" We cannot be required to email parents who are not online.

COMMENTS/SUGGESTIONS**§126-28-5. Attendance.**

5.1 The final determination for the child's attendance shall be made by the principal for preschool students, just as it is for kindergarten students.

§126-28-6. Collaboration and the County Plan.**6.4. Collaboration and the County Plan**

The requirement for 50% of the classrooms to be in community settings places an undue burden on school systems. Our system is currently operating 30% of its centers in collaboration with other reliable agencies. Some of these are located within the public schools. Why could these not count toward collaborative efforts in community settings? It would seem the intent is not to encourage collaboration, but to be sure that preschool classrooms are not placed in the public school setting. Both the 50% requirement and the definition of community settings should be changed. It also behooves us to consider those groups who may choose (some for religious reasons) not to be part of the plan. These could account for a significant portion of the population of a county, making it even more difficult to achieve the 50%.

9.1 Regulation of Facilities

We have attempted to place one of our collaborations into a childcare facility that has been licensed for several years to a private childcare entity in our community. The site has become available to us while the owner is on criminal probation. Both the licensing coordinator and the fire marshall have refused to license that same facility to us for our collaboration. Thousands of dollars have been spent by our collaboration on the physical plant: furnace, steps, paint, carpentry and electrical work. The site is still deemed unacceptable for licensure, even provisionally. Since our efforts have only improved the site, it is difficult to understand how improving it according to the directions of the licensing coordinator and fire marshall have failed to make it licensed and usable for our collaboration, but acceptable for a private daycare.

10.1 Standards for Preparing Students

Does this standard mean that any participating agency must use the adopted curriculum at all times? What would this mean for daycare centers and faith-based groups? How would this be monitored?

16.1 Program Oversight

We need a more well-defined mechanism or model for monitoring program implementation at all sites for all agencies involved in the plan.

17.2 Financing

This is another unfunded mandate. Preschool programs are expensive and excellent preschool programs are incredibly expensive.

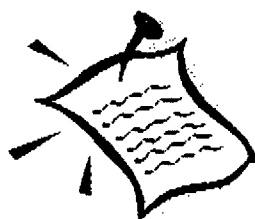
Please Mail the Completed Comment Form to:
Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, WV 26305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

✓
TJG

FAX COVER SHEET

A note Just For You

EACHS HEAD START
2 HYDE AVE
PETERSBURG WV 26847
Phone: 304-257-4853
Fax: 304-257-4829



DATE: 11/21/02

TO: Cathy Jones, Ed. D.
FROM: Cher Jolley, Early Childhood Succ. Coord.

FAX # 304-558-6268

TOTAL PAGES: 4

MESSAGE: Comments on Policy 2525

Policy 2525: West Virginia's Universal Access to Pre-Kindergarten System

COMMENT PERIOD ENDS: November ²⁶~~20~~, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525

Individual /Organization: Cher Jolley, EACHS Head Start

Title: Early Childhood Services Coordinator **Business:** Head Start Grantee

Street Address: 2 Hyre Avenue

City/State/Zip: Petersburg, WV 26847

Comments/Suggestions
126-28-1. General.
126-28-2. Guidelines. Item 2.1.6. - Will Pre-K Content Standards be developed? The Head Start Child Outcomes Framework and the WVHSA Child Development Outcomes may be a helpful resource. Item 2.1.11 - For ratios and class size, can daycare, Head Start and Public Preschool regulations all be honored?
126-28-3. Definitions. Item 3.7  - 3+ Consecutive days will provide much more continuity for children.
126-28-4. Parent/Guardian Involvement and Family Support. Item 4.1.2 - Would you also want to include a regular school/home connection such as a weekly checklist to inform parents of child's general well-being? Item 4.1.3 - It's nice to see focus on transition INTO, as well as OUT of program! I think that smooth transitions into the program will set children up for success and will contribute to better attendance.

126-28-5. Attendance.

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

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. Would it really be necessary to require programs to choose from a list (item 11.1) of approved curriculums? Perhaps if ALL Standards in section 11.4 were met, other curriculums (locally designed or eclectic in nature) could be approved. I think standards set forth in 11.4 are excellent! I like focus on individualizing, self-esteem building and holistic approach. Under 11.4.3d, may want to mention the importance of using teachable moments to facilitate child's learning, and importance of allowing children's interests to drive the topics of study. 11.4.12 - May want to include that programs need to provide a system of support for teaching staff with mentoring and ongoing training..... the training is mentioned later in section 14.

126-28-12. Transition and Continuity. 12.1.5 Transition Planning re. Children w/special health needs (IHPs) should also be conducted.
126-28-13. Inclusive Environments.
126-28-14. Staff Development and Training. May also want to include a plan of training parents about d.a.p. so they can teach their children most effectively.
126-28-15. Transportation.
126-28-16. Program Oversight.
126-28-17. Financing.
126-28-18. Health and Safety. 18.1 - Also make sure no lead base paint was used in building.- Water test done 18.6 - Outdoor area - fenced, with soft zones 18.8 Staff serving food should have Food Handler's card
126-28-19. Program Evaluation.

*** Very impressive! Well - thought out, thorough, I think it's excellent!!**

I think it is really going to be a challenge to involve family day care in this plan due to the training requirements for teachers, and the limit of no more than 6 children in daycare homes.

Please Mail the Completed Comment Form to:
Cathy R. Jones, Ed.D., Coordinator, Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304)558-6268

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Lee A. Horn

Title: Teacher Early Childhood Business: Paden City Elementary School

Street Address: 510 N. 2nd Ave.

City/State/Zip: Paden City, WV 26159

COMMENTS/SUGGESTIONS

§126-28-1. General. *The setting of these programs for 4 year olds should be part of public school physical plant and county education philosophy, rules etc. Head Start & other agencies differ greatly and consistency is vital.*

~~**§126-28-2. Guidelines.**~~ *Employees teaching should be qualified with 4 year degree in Early Childhood Education.*

§126-28-3. Definitions.

4 year old program should not mirror 5 year old Kindergarten program. Should be more social than academic

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

Mercer County Early Learning Center - Silver Springs
821 Broadway
Princeton WV 24740
Phone: 304-425-4251 Fax: 304-425-5117

FAX Cover Sheet

Date: 11/20/02

From: N. Wiley

To: Cathy Jones.

Agency: WVDE

Fax No: (304) 558-6268

Re: Comments 2525

Number of Pages Including Cover: 4

Comments:

universal access to pre-K
pg. 4 separately

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Nancy Wiley
Mercer Co. Early Learning Center-Pctn

Title: teacher Business: _____

Street Address: Broadway St.

City/State/Zip: Princeton, WV 24740

COMMENTS/SUGGESTIONS

§126-28-1. General.

§126-28-2. Guidelines.

excellent!

§126-28-3. Definitions

3.6 - if a child under IEP isn't deemed
and will ^{and will} ^{can advance developmentally}
ready for K^g even with a label, the County
System should facilitate his/her
remaining at the preschool level
through age five. If parents, et. al. make
this decision, the system should not
require a five-day program just because
the child would have a full week ~~in~~ the
K^g class.

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

§126-28-5. Attendance.

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

*challenging but
so appropriate.*

Please Mail the Completed Comment Form to:
Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

(over)

Re: facilities - When 20-23 children are grouped in a former elementary school room, clearly, there is no where near the "shall provide useable floor space of at least 35 sq. ft. per child ..." requirement of §126.20.18/18.6. Also, with 20-23 little bodies in this space, where does one provide all the excellent curricula suggestions/requirements included in this draft. (Space has impact on behavior, curricula, et. al.)

Re: 11.6 Excellent!

re: Transitioning - 12.1.3 crucial to quality

re: inclusion - Proximity doesn't guarantee true inclusion. Quality programs reflect more than $A+B=C$.

This is an exciting event.

Cathy Jones

From: Ruthann Arneson [ruthannarneson_hs@hotmail.com]

Sent: Wednesday, November 20, 2002 4:26 PM

To: ctrjones@access.k12.wv.us

Subject: Response to Policy 2525

Cathy,

The West Virginia Head Start Education Advisory Council makes the following recommendations in regard to Policy 2525:

1. Parents MUST be involved. We support the minimum of two parent conferences, parents involved in the plans to implement 2525 and opportunities for parents to participate in decision making about their child's education.
2. We support the no less than 50% collaboration with community programs.
3. We support the Personnel standards as written. This provides for experienced early childhood staff who can implement quality programing.
4. We support the curriculum and assessment standards they consider the Head Start outcome measures and support developmentally appropriate practices.

Thank you

Re: facilities - taken 20-23 children
are grouped in a form
elementary school form, clearly,
there is no other near the

"space provide nearby from space
of at least 35 sq. ft. per child ..."

Requirement of §126.20.18/18.6. Also,

"Unit 20.23 little better in this space,
where does one provide all the
excellent curricula suggestions/require-
ments included in this draft,
(Space has impact on behavior,
curricula, et al.)

Re: 11.6 Excellent!

Re: Timing - 12.1.3 curricular quality
re: inclusion - Precision doesn't
guarantee true inclusion. Quality
programs reflect more than $A+B=C$.

This is an exciting event.

(FAX)

SIGNED:

J. Sheppard

MESSAGE:

FAX NUMBER: 304-558-6268 DATE: 11/22/02

Bldg. 6 Room 318
Charleston WV
1900 Kanawha Blvd.

TO: Dr. Cathy Jones
TOTAL PAGES: 5 (includes cover)

RR #3, Box 610
Wellburg, WV 26070
Phone (304) 527-1410
Fax (304) 527-3604

BROOKE HIGH SCHOOL

FAX COVER SHEET



126CSR28

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization:

Title: Brooke High Preschool Business: L. AbercrombieStreet Address: RD #3 Box 610City/State/Zip: Wellsburg, WV. 26037

COMMENTS/SUGGESTIONS

§126-28-1. General.

§126-28-2. Guidelines.

There should be a 4 year old program and a different program for eligible 3yr olds. Developmental needs are not the same. How will the class sizes be decided when

§126-28-3. Definitions.

inclusion of special needs children are incorporated?

What if 20 of 20 children need to be trained? That could happen! 3½ hours per day makes it difficult for public schools to incorporate an AM & PM schedule.

126CSR28

§126-28-4. Parent/Guardian Involvement and Family Support.**§126-28-5. Attendance.****§126-28-6. Collaboration and the County Plan.**

50% of the classrooms, what about the other ways collaboration could be implemented? (Transportation, food service, etc. Why the 50%.

§126-28-7. Waivers.**§126-28-8. Personnel Standards.**

The teachers who already have a pre school special needs degree already had to get a specialization for that. It seems unfair to make them

§126-28-9. Regulation of Facilities.

get another one. If a degree is required for special needs, 9 hours of inclusive training will not prepare me to teach special needs children. What is wrong with the existing programs?

126CSR28

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

§126-28-11. Curriculum and Assessment. If we are truly to prepare children for kindergarten, the elimination of using worksheets totally will not help the children. I very rarely use them, but do so occasionally so that the children will be prepared to listen to a teacher directed,

§126-28-12. Transition and Continuity. Whole group instruction. I do make them fun and incorporate them into our special units. The parents want me to do more of this, not less. Again, I don't use them often, but they help to prepare

§126-28-13. Inclusive Environments. the children.

Doesn't head start segregate children on the basis of socioeconomic level? Very few children are admitted without meeting the

§126-28-14. Staff Development and Training. income guideline. What is the percentage?

§126-28-15. Transportation.

Inclusive: We currently have 3 regular ed preschools and a special needs class. We do special units together, parties, programs, and other activities. Our program works. Not all children are ready or capable of being in classrooms of 20 children.

126CSR28

§126-28-16. Program Oversight.

§126-28-17. Financing.

§126-28-18. Health and Safety.

Again - 20 children are too many when
you consider inclusion.

§126-28-19. Program Evaluation.

Please Mail the Completed Comment Form to:
Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

Dr. Cathy Jones Coordinator Early Childhood/Even Start

**COMMENTS FROM: KANAWHA COUNTY SCHOOLS PRESCHOOL
SPECIAL NEEDS TEACHERS AND HEAD START TEACHERS**

Contact: Debbie Brown at 348-1353 for additional information

Scope 1.1 Scope is extremely broad (3's, 4's, 5's with IEPs and typically developing 4's. Will the curriculum, content standards and assessment be able to consider the needs of all these children.

Definitions 3.6 Eligible child definition increases the scope of the program to include 5 year-olds by this definition. This opens a door for young 5's who are too immature to handle the difficult K content standards to flood these programs. Children receiving an additional year should meet eligibility criteria for preschool special needs services.

3.7 Minimum program availability should be addressed in hours or minutes per week (12hours or 720 minutes); current wording too restrictive.

If funds are provided through a variety of sources will pre-K staff/classrooms have to follow the specific regulations of each funding agency? Paperwork needs to be consolidated and simplified to be managed by the classroom teacher.

Attendance 126-28-5 Attendance should to be a joint commitment from both school and parent rather than responsibility be solely school staff.

Personnel Standards 126.28-8- Revisit dual certification issues with special consideration given to teachers with masters in preschool special education and consideration given to experience in classroom with typically developing preschoolers.

Shelly Arloagast
Audie Jungst
Elizabeth Kittle
Margaret Cobell
Kathy Bruner
June [unclear]
Sherry Harrison -
John A. Elliott
Sandra Elkins
Karen Clatworthy
Jill Browning
Carol Lane
Kristie Anderson
Diana Corke
Debra Webster
Rebekah Tucker
Connie Roadcap
Linda Sims
John Krupp
Mike Brown
Lauri Lane

Participation in Comment
Cherie W Smith
Mimi Davis
Maiah Coll
Debbie Brown

Incoming Fax From:

NCWVCCA-HEAD START

PO Box 724

Cowen, WV 26206

Phone: 304-226-5991

Fax: 304-226-5635

To: Dr. Cathy Jones

From: Betsy Morris

Of: _____

Date: 11/22/02

Fax Number: 558-6268

Time: 5:15pm

Total number of pages to follow: 5

(This includes the cover sheet)

Comments: _____

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POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 12, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: NCWVCAA - Web Co. HeadStart

Title: Children Service Supervisor Business: _____

Street Address: Box 724

City/State/Zip: Cowen, WV 26206

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.

- I like the 50% contract as long as the contractors cannot replace employees.
- doesn't HeadStart need to be present for the plan approval 6.2.
- each agency should review their main interest areas.

§126-28-7. Waivers. - I like the Waivers as long as they are not abused by schools who do not wish to participate.

§126-28-8. Personnel Standards.

- 8.2 - Keep the "permit shall be issued" phrase, not permitting BOE to use discretion to change the wording to "MAY issue"

§126-28-9. Regulation of Facilities.

- I like the monitoring part if this follows through as discussed.

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

§126-28-11. Curriculum and Assessment.

11.4.7. G. Allowing for non-nappers to engage in quiet activity -
concern: in a one room setting how can children be up playing while
other rest. Don't daycare regulation require rest time.

§126-28-12. Transition and Continuity.

11.5.1. I like the center set-ups for classrooms -, allowing
teachers to utilize the curriculum of choice, but setting guidelines
11.6. I don't like the mimeographed paper as often this is taken to
extremes, think Absolutely, under no condition can the copier be used.

§126-28-13. Inclusive Environments.

Please watch that center don't become the "dumping
grounds" for BOE, IEP students, thus the BOE does not have to
hire aides to work w/ the children, provide transportation - ~~not~~
only visit 30 minutes a month w/ special needs instructors.

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

who will pay for the training & why is it limited to curriculum/assessment?

§126-28-15. Transportation.

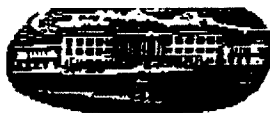
I think if the BOE & Head Start already blend - don't rock the boat -
But requiring transportation could stop the ~~the~~ entire process, due to
cost. Collaboration on who need transportation should be occurring

§126-28-16.	Program Oversight.		
§126-28-17.	Financing.		
§126-28-18.	Health and Safety. I like these roles.		
§126-28-19.	Program Evaluation. I like the ECLERS leave this - but allow the R&R's to help - or let Head Start Regions train their staff person.		

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D., Coordinator, Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268



**FAIRMONT STATE
COMMUNITY AND TECHNICAL COLLEGE
FAX COVER SHEET**

Early Childhood

**Education Building
1201 Locust Avenue
Fairmont, West Virginia 26554**

Fax: 304-367-4587

To:	<i>Dr. Cathy R. Jones</i>
Fax No.:	<i>304-558-6268</i>
From:	<i>Nancy Cheshire</i>
Date:	<i>11-22-02</i>
No. of Pages (Including Cover sheet)	<i>8</i>
Subject:	<i>Comments on Policy 2525</i>

Comments:

If you have questions regarding this FAX , please call (304)367-4588.

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization:

Nancy Jane Cheshire

Title: Business:

**Fairmont State Community and Technical College
Early Childhood Program Coordinator**

Street Address:

1201 Locust Avenue

City/State/Zip:

Fairmont, WV 26554

COMMENTS/SUGGESTIONS§126-28-1. General.

I believe that Dr. Cathy Jones is to be commended for the high quality document now up for comment. It is based on what research has shown to be the best practices for early childhood education. Our challenge now is to guarantee that the state preschool programs be implemented in a manner that preserves best practices in developmentally appropriate classrooms with trained teachers and staff.

§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.

I believe it is very important that teachers and staff in the preschools have a strong background in early childhood education as proposed in the current plan. This a crucial element in providing quality and developmentally appropriate programs.

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

It is imperative that standards and guidelines set by the National Association

for the Education of Young Children be followed in both curriculum and assessment. The document now receiving comment has followed these standards and guidelines but policies for implementation must insure that developmentally appropriate practices will be implemented in all counties.

§126-28-12. Transition and Continuity.

§126-28-13. Inclusive Environments.

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

§126-28-15. Transportation.

§126-28-16. Program Oversight.

I suggest that for the success of implementation, training be provided for all county supervisors of public preschools so there will be an understanding of developmentally appropriate and guidelines of the National Association for the Education of Young Children. This is essential if the current document is to be put into action so that best practices identified by current research are followed

§126-28-17. Financing.

§126-28-18. Health and Safety.

§126-28-19. Program Evaluation.

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start

Office of Instructional Services

West Virginia Department of Education

Capitol Building 6, Room 318

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us

Fax No.: (304) 558-6268

**West Virginia Department of Education
1900 Kanawha Boulevard East
Charleston, WV 25305**

(Phone List by Topics) (Staff Phone and Email by Name) (School Directory)

FAX TRANSMISSION

HARRISON COUNTY BOARD OF EDUCATION
P. O. Box 1370
Clarksburg, WV 26302-1370
(304) 624-3325
Fax: (304) 624-3361

To: Cathy R. Jones, Early Childhood

Fax #: 304-558-6268

From: Frank Devono

Date: 11-22-02

Page 1 of 3

Comments: _____

If you do not receive all pages, please call us at (304) 624-3325, ext. _____

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System**COMMENT PERIOD ENDS: November 20, 2002**

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Frank D. Beum
Title: Admin Liaison Business: _____
Street Address: 408 EB Sanders Way
City/State/Zip: Clarksburg WV 26301

COMMENTS/SUGGESTIONS**§126-28-1. General.**

Applaud the intent to make consistent preschool opportunities available.

§126-28-2. Guidelines.

Approve the intent to provide developmentally appropriate environments to all children.

§126-28-3. Definitions.**3.7 Minimum program availability**

The length of a day for both WVDE & WVDHHR should be identical. If not, then a 3½ hour day is too long for personnel purposes. Teachers may not exceed an 8 hour day. The seven hours of instruction does not allow for lunch, planning and travel time.

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

4.1.2 Documented methods of communicating with parent/guardian "which may include" We cannot be required to email parents who are not online.

COMMENTS/SUGGESTIONS**§126-28-5. Attendance.**

5.1 The final determination for the child's attendance shall be made by the principal for preschool students, just as it is for kindergarten students.

§126-28-6. Collaboration and the County Plan.**6.4. Collaboration and the County Plan**

The requirement for 50% of the classrooms to be in community settings places an undue burden on school systems. Our system is currently operating 30% of its centers in collaboration with other reliable agencies. Some of these are located within the public schools. Why could these not count toward collaborative efforts in community settings? It would seem the intent is not to encourage collaboration, but to be sure that preschool classrooms are not placed in the public school setting. Both the 50% requirement and the definition of community settings should be changed. It also behooves us to consider those groups who may choose (some for religious reasons) not to be part of the plan. These could account for a significant portion of the population of a county, making it even more difficult to achieve the 50%.

9.1 Regulation of Facilities

We have attempted to place one of our collaborations into a childcare facility that has been licensed for several years to a private childcare entity in our community. The site has become available to us while the owner is on criminal probation. Both the licensing coordinator and the fire marshall have refused to license that same facility to us for our collaboration. Thousands of dollars have been spent by our collaboration on the physical plant: furnace, steps, paint, carpentry and electrical work. The site is still deemed unacceptable for licensure, even provisionally. Since our efforts have only improved the site, it is difficult to understand how improving it according to the directions of the licensing coordinator and fire marshall have failed to make it licensed and usable for our collaboration, but acceptable for a private daycare.

10.1 Standards for Preparing Students

Does this standard mean that any participating agency must use the adopted curriculum at all times? What would this mean for daycare centers and faith-based groups? How would this be monitored?

16.1 Program Oversight

We need a more well-defined mechanism or model for monitoring program implementation at all sites for all agencies involved in the plan.

17.2 Financing

This is another unfunded mandate. Preschool programs are expensive and excellent preschool programs are incredibly expensive.

126CSR28**POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System****COMMENT PERIOD ENDS: November 20, 2002**

***Directions:** Please use this form to provide comments/suggestions regarding revised Policy 2525.*

Individual/Organization: Patricia J. Gracey

Title: Executive Director, Northern Panhandle Head Start Inc., Member of West Virginia Head Start Association Board of Directors, Member of the PIECES Advisory Council
Business: Head Start

Street Address: 51 16th Street

City/State/Zip: Wheeling, WV. 26003

COMMENTS/SUGGESTIONS

§126-28-1. General. I believe the Head Start Performance Standards, developed over 35 years must be the guiding set of standards for WV Pre K since they are the result of extensive research and practice. They did provide Policy 2525 drafts with guidance and I think they must be reflected in the final Policy 2525 draft if we are to develop a high quality early education and care system for WV children. I support the collaborative structure of the Policy and the check/balance between DOE and DHHR will bring about full utilization of resources both professional and financial. Head Start must be the linchpin of this system since they are the most experienced and have expertise in the field.

126CSR28

§126-28-2. Guidelines. I support all guidelines and recommend this adjustment to
2.1.3. provide the building blocks for literacy and social competency.

2.1.11. establish teacher/child ratios and class size according to accepted research best practices.

§126-28-3. Definitions.

3.6 I support this definition wholeheartedly!

3.7 THIS SCHEDULE IS THE MINIMUM RECOGNIZED OPTION TO PROVIDE CHILDREN WITH THE BEST LEARNING SCHEDULE. To bring about the best result for children please do not change this schedule.

3.8 Please add Head Start to this list.

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

4.1.1 I propose this change: a minimum of 2 parent conferences annually and an initial home visit by teacher/social service personnel.

§126-28-5. Attendance.

I support this plan

126CSR28**§126-28-6. Collaboration and the County Plan.**

Any changes to amended plans must be signed by the collaborating parties.

6.4 This part is critical to the success of the pre K program and must be maintained. It could be qualified by adding " in counties that lack child care and education classrooms the county schools on a case by case basis may request a waiver of the 50% rule with signed agreement of core partners." (For Head Start this is a coalition mandate)

6.5 I support the provision that the Core partners must be invited to attend all meetings during the time the plan is being developed and any amendments are being made to the county plan. (This is a coalition mandate.)

§126-28-7. Waivers.**§126-28-8. Personnel Standards.**

8.2. Head Start programs are clear in their message to the Board and to the Legislature: We must keep this part of the policy for them to participate and cooperate with the development and implementation of the WV Pre K system. To remove this part of the Policy would derail the system for a very long time. It is obvious that this part of the policy was developed and supported by the educated and experienced child development specialists who developed the Policy. I believe it must remain.

§126-28-9. Regulation of Facilities.

I believe that this part of the policy is a great compromise and it will work.

126CSR28**§126-28-10. Standards for Preparing Students.**

I support this section.

§126-28-11. Curriculum and Assessment.

I support this section and believe it will ensure a very high quality system of early education.

§126-28-12. Transition and Continuity.

I support this section as written.

§126-28-13. Inclusive Environments.

Research is very clear – Inclusion of children with disabilities in these classrooms MUST Be supported by policy and action. Head Start is the leader in the field and they need to be coopted to help in this area.

NEW SECTION NEEDED

This policy lacks guidance to the county teams as to how families will be recruited and enrolled equitably when there is the issue of under enrollment for Head Start and for Child Care.

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

I accept this section.

126CSR28

§126-28-15. Transportation.

Transportation is not only critical to helping the 46% of families living below the poverty line in WV get their children to the WV Pre K program, by will ensure equal access and equal education for all. We must solve this problem and ensure all have transportation if they need it to attend the program.

The policy could be amended later to address isolated families through a different option?

§126-28-16. Program Oversight.

16.1 I suggest that this be expanded to include ...staff evaluation, discipline, and supervision of the project. It is appropriate for the most experienced organizations to be assigned to a collaborative classroom as well as the other partners.

§126-28-17. Financing.

I strongly support 17.1. The motivation to implement this system collaboratively is tied to the financial resources and we want to take away all incentives to "do it alone".

§126-28-18. Health and Safety.

I strongly support this section. Before all else, we as educators and administrators are commissioned to maintain a safe and healthy environment that protects these most vulnerable preschool children. We have NAEYC, Child Care licensing regulations and other important rules and regulations to follow as we implement preschool education classrooms. If you could strengthen the accountability section for organizations I would be grateful.

126CSR28**§126-28-19. Program Evaluation.**

I support the utilization of ECKERS but this instrument may not be the best to evaluate the management systems and the program's performance fully. Expand this section to include local choice of using an additional instrument like the Head Start PRISM Instrument.

Please Mail the Completed Comment Form to:
Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

FAX

To: Cathy R. Jones, Coordinator, Early Childhood/Even Start
Office of Instructional Services
WV Dept of Ed.

From: Beth Lowe, Parents As Teachers.

Date: 11/20/02

Number of Pages: 5 (including cover)

Comments:

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Beth Lowe / Wetzel County SchoolsTitle: Elementary teacher Business: _____Street Address: RR 2 Box 107City/State/Zip: New Martinsville, WV 26155

COMMENTS/SUGGESTIONS
§126-28-1. General. 3 yr olds are not address
§126-28-2. Guidelines. 2.1.7 Staff need to be certified early childhood teachers.
§126-28-3. Definitions. 3.7 Large county school systems need to have flexibility to avoid transportation problems.

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

§126-28-5. Attendance.

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

6.4 A mandated percentage of contracted services will ensure failure & negates the spirit of collaboration.

§126-28-7. Waivers.

§126-28-8. Personnel Standards.

§126-28-9. Regulation of Facilities.

9.1 Follow WV Dept of Ed facility requirements

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

§126-28-11. Curriculum and Assessment.

11.6 No need for this policy. Developmentally appropriate practices will be used by CERTIFIED teachers.

§126-28-12. Transition and Continuity.

§126-28-13. Inclusive Environments.

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

§126-28-15. Transportation.

Needs to be more specific.

§126-28-16. Program Oversight.

Need to be more specific.

§126-28-17. Financing.

§126-28-18. Health and Safety.

§126-28-19. Program Evaluation.

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D., Coordinator, Early Childhood/Eve : Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Pamela Blake / Head StartTitle: Area Coordinator Business: _____Street Address: Hc 61 Box 11BCity/State/Zip: Wileyville, WV 26186

COMMENTS/SUGGESTIONS

§126-28-1. General.

I support this rule because I believe all four year old children should have access to high quality Pre-Kindergarten programs.

§126-28-2. Guidelines. I agree that all Pre-K classrooms should be readiness programs and building blocks for literacy but I think the most important things are to view children within the context of their family, involving families and building on what the child already knows

§126-28-3. Definitions. I believe that "developmentally appropriate" means a curriculum for "early childhood" programming not a watered down Kindergarten curriculum. I also agree that the minimum program availability should be at least three consecutive days (preferably four) and at least 3½ hrs. per day.

Page -2-

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

I believe parent involvement to be so important that this section needs to be strengthened to require more from the county in addressing how they work with each family on their goals in literacy, Parenting, Employment and Wellness.

§126-28-5. Attendance. I agree that there should be an attendance policy. Head Start has to maintain 85% attendance and be fully enrolled at all times. I believe this needs to occur in order to best utilize the funds.

§126-28-6. Collaboration and the County Plan. I agree that the Collaborative County Plans should include Head Start and Community Child Care Programs and I support that a minimum of 50% of the four year old classrooms be contracted to community programs meeting the standards in this policy.

§126-28-7. Waivers.**§126-28-8. Personnel Standards.**

I Strongly support sections 8.2 through 8.3 for qualifications and the full-time permit to assure qualifying certification/endorsement of personnel.

§126-28-9. Regulation of Facilities. Head Start Performance Standards require Head Start programs to meet the most stringent of regulations for the Safety and Health of enrolled children. The Regulation of facilities requirements of this Policy are minimal requirements to meet. I support requiring all programs in a pre-K setting to meet the WUDHHR Child Care Licensing Regulations and enforcing any correctional action plans identified through the DHHR monitoring process.

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

I agree that the Standards for preparing students should align with the Head Start outcomes framework.

§126-28-11. Curriculum and Assessment. I strongly agree that the curriculum must be developmentally appropriate and that it is vital to the educational success of the child that parents/guardians are encouraged to participate as much as possible. I believe this area needs to remain incorporated into the planning process.

§126-28-12. Transition and Continuity.

I agree that there needs to be a written transition plan and I think that the Tadpole Agencies that are already doing this should be utilized.

§126-28-13. Inclusive Environments. I agree with the inclusive environment policy but am not sure how that would affect Head Start regulations for servicing low income families. I do agree that all 4 year olds need access to preschool but I think low income and families at risk should have priority.

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

I would support a county plan to include annual staff development related to high quality programming and agree that it should follow the STARS training process.

§126-28-15. Transportation. I believe that for all 4 year olds to have access to a program, transportation must be a mandated service and I believe programs should follow the most stringent requirements for transporting pre-schoolers.

Page -4-

§126-28-16. Program Oversight.

§126-28-17. Financing.

I believe that state funds should only be provided to counties who have an approved plan (collaborative).

§126-28-18. Health and Safety. The Health and Safety areas of this Policy are minimal requirements to meet. I believe all programs serving four year olds should meet WV DHHR child care Licensing Regulations.

§126-28-19. Program Evaluation.

I agree that programs should be assessed by a trained outside evaluator but I think every five years is not enough. I think it should be a minimum of every three years to ensure quality programs.

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D., Coordinator, Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Nancy Richmond

Title: Parent Involvement Coord. Business: Wetzel County Schools
Adult Basic Education Coord.

Street Address: RR 2, Box 107

City/State/Zip: New Martinsville, WV 26155

COMMENTS/SUGGESTIONS
§126-28-1. General.
§126-28-2. Guidelines. To ensure the best and most appropriate Pre-K system for our children, the teacher, at minimum, should have a ~~bachelor~~ bachelor of arts or science degree which includes early childhood education.
§126-28-3. Definitions. If it is less expensive for a county to drop an existing program funded through public education and replace the program with a contracted program, are we jeopardizing the quality of Pre-K education in our county?

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

§126-28-5. Attendance.

§126-28-6. Collaboration and the County Plan. By mandating 50% of classrooms for eligible children be provided through community programs, the spirit of collaboration is tarnished in that the process of collaboration should decide how all programs best coordinate, not a preconceived mandate.

§126-28-7. Waivers.

§126-28-8. Personnel Standards. Because Pre-K students are at a critical point in beginning a lifetime of learning, at the very least, teachers must have a bachelor of arts or science degree which includes early childhood education. Hiring educators with less may save money, but in the long run, our children will be short-
changed.

§126-28-9. Regulation of Facilities. Since Pre-K education is not child care services, the WVDHHE Child Care Licensing staff should not conduct monitoring visits.

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

§126-28-11. Curriculum and Assessment. "Mimeographed work sheets" may include tracing activities, so we need to be careful about generalizing exclusions. I understand that no student, at any age, should spend time on mindless ~~to~~ seat work, so maybe this needs to be reworded.

§126-28-12. Transition and Continuity.

§126-28-13. Inclusive Environments.

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

§126-28-15. Transportation.

§126-28-16. Program Oversight.

§126-28-17. Financing.

§126-28-18. Health and Safety. The classroom size should be limited to no more than 20 children with the ratio at 1 adult: 10 children. This is a sound idea. And, it is not necessary that more than one adult in the classroom be a certified teacher.

§126-28-19. Program Evaluation.

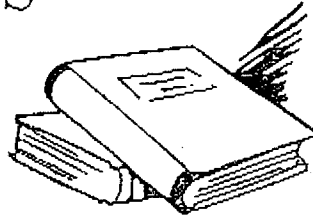
Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D., Coordinator, Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

FAX TRANSMISSION
HARRISON COUNTY SCHOOLS

Special Services Department
408 E. B. Saunders Way
Clarksburg, WV 26301



Phone: (304) 624-3325 Ext. 3308
FAX: (304) 624-3325 Ext. 3380 or
(304) 624-3361

DATE: 11-19-02

TO: Cathy Jones

FAX #: 304-558-6268

FROM: Doree Moore, Coordinator of Health Services
Harrison County

RE: Comments

PAGE 1 of 2

Comments:

18.10 4 issues !!!

- 1) Since most of these children will be going to kindergarten the following year screening them in Pre-School means they will be screened twice during the school year!
- 2) Pre-Schoolers are too youds + immature to get accurate results. Last year we did the children in Pre-K both in the fall + spring. In the results were better + more accurate in the spring! The spring is a better time since they are getting the DIAL done at that time.
- 3) Pre-School Screening is very time consuming and takes time from other screenings + programs
- 4) If pre-enrollment screening of pre-K is mandated what gets eliminated? who pays for extra staff +/ or specialized equipment needed?

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start

Office of Instructional Services

West Virginia Department of Education

Capitol Building 6, Room 318

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us

Fax No.: (304) 558-6268

West Virginia Department of Education
1900 Kanawha Boulevard East
Charleston, WV 25305

(Phone List by Topics) (Staff Phone and Email by Name) (School Directory)

For suggestions, questions, problems contact the webmaster
Please read our disclaimers

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: *Pamela Helmandollar*
Wyoming County Head Start

Title: Business: *Licensed Practical Nurse, Health & Safety Specialist*

Street Address: *P.O. Box 1509*

City/State/Zip: *Oceana WV*
24870

COMMENTS/SUGGESTIONS §126-28-1. General.

§126-28-2. Guidelines. *Head Start has always met the guidelines as far as being a readiness program that meets the needs of eligible children. Our creative curriculum supports how children learn.*

Family has always been viewed upon as the "child's first teacher" and has been included in all developmental aspects of that child. I feel Head Start can provide an enormous amount of support to the WV Pre-K classrooms just with the knowledge and expertise that we already demonstrate in our program.

§126-28-3. Definitions.

Under the County collaborative plan 3.4. I do hope that our County Board of Education will collaborate effectively with our County Head Start program. Both both agencies have so much to offer for this program. And I also hope that Parent/Guardian Involvement & Family support remains a critical part of the child's development, such as what Head Start now offers families. Head Start has always been a big advocate on training parents, and I do hope this will continue to be initiated in the WV Pre-K program.

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

'See notation above'

§126-28-5. Attendance.

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

All pre-school agencies should be involved in developing a County plan with the Board of Education. Each agency has expertise & knowledge that is vital in developing an appropriate plan for their County.

§126-28-7. Waivers.

I do not think this applies to Wyoming County. Head Start alone has 13 Head Start Centers located throughout the County.

§126-28-8. Personnel Standards.

"See notations of Director & Education Specialist"

§126-28-9. Regulation of Facilities.

§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.

Head Start has always ~~been~~ provided appropriate training to all our staff regarding:

- Education
- personnel procedures
- policies
- Health training (and as CPR/First Aid./Emergency training).

Training is an on-going process with Head Start, this could be a plus for this type of program, using our qualified Employees for this

§126-28-15. Transportation.**§126-28-16. Program Oversight.****§126-28-17. Financing.****§126-28-18. Health and Safety.**

Head Start possesses a very effective Health & Safety Program for our children. Dealing with all aspects of child's health, physical & mental, tracking appropriate screening, ensuring a medical home for our families through our policies & procedures. Information such as this could be valuable in devising a County plan for this program.

§126-28-19. Program Evaluation.

Head Start has always had an on-going process of evaluating our program. This could be another collaborative effort through all Pre School Agencies reviewing such policies in helping or assisting the BOE in devising a County plan.

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start

Office of Instructional Services

West Virginia Department of Education

Capitol Building 6, Room 318

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us

Fax No.: (304) 558-6268

**West Virginia Department of Education
1900 Kanawha Boulevard East
Charleston, WV 25305**

() ()

For suggestions, questions, problems contact the
Please read our

126CSR28

Title: Collaborative Planning Committee Business:

PIECES
Bill H.
Kay Carpenter

Street Address:

City/State/Zip:

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

65 1. Core Partnership need to clarify (especially for large counties) licensed child care centers all need to be invited as a core partnership - Not just one. Representation needs to occur for licensed facilities.

65 intent is licensed facilities not those centers on provisional permits and stay on provisional status.

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start

Office of Instructional Services

West Virginia Department of Education

Capitol Building 6, Room 318

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us

Fax No.: (304) 558-6268

6.4 50% - Intent is not to dismantle collaborative settings currently in place. Simply because classes in school does not mean to dismantle & put in child care center.

1b.2 designee be of someone w knowledge & expertise in collaborative planning, early care & education. (Page 13)

15.1 Transportation needs to be coordinated required service not a support; otherwise ~~it~~ it is not a universal preK system. Careful consideration needs to given to financial, safety concerns and ramifications and making the plan feasible. However,

To: Dr. Cathy Jones

From: Pamela Bishop

Fax: 3 pages including cover

RE: SB 247

11-22-02

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding Revised Policy 2625.

Individual/Organization:

Pamela Bishop
Wyoming Co. Schools

Title: Business:

Street Address:

Box 69
Pineville, W.V.

(OR)

Box 267
Bud, W.V.

24874

24716

City/State/Zip:

COMMENTS/SUGGESTIONS §126-28-1. General.

I have concerns about 3 year olds being left out, teacher training and personnel requirements, and having programs run on 3 consecutive days.

§126-28-2. Guidelines.

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

§126-28-7. Waivers.

§126-28-8. Personnel Standards. I have a concern that PS special needs teachers are not being looked at as qualified to teach the PreK program. Look at what we had to do to get our certification. We had to know about "normal" development first before we were trained to know what was not normal. Most of us in this field have been working in it for years. We should not be required to go back to school. We should be grandfathered in on the certification as speech therapists were years ago.

§126-28-9. Regulation of Facilities.

Vicki Moss

From: Cathy Jones [ctrjones@access.k12.wv.us]
Sent: Tuesday, December 03, 2002 9:25 AM
To: Vicki Moss
Subject: FW: Policy 2525 comments

Cathy R.Jones, Ed.D.
Coordinator Early Childhood/Even Start
Building 6, Room 318
1900 Kanawha Blvd.East
Charleston, WV 25305-0330
Phone 304-558-2691
Fax 304-558-6268
ctrjones@access.k12.wv.us

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

From: dr butler [mailto:rnbutler@access.k12.wv.us]
Sent: Saturday, November 23, 2002 12:40 AM
To: ctrjones@access.k12.wv.us
Subject: Policy 2525 comments

11/22/02

Cathy,

Please accept the attached (MS Word) comments on Policy 2525,

Thanks,

R. Butler

12/3/02

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System**COMMENT PERIOD ENDS:** November 22, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: **Dr. Richard Butler**Title: Superintendent Business: Ritchie County SchoolsStreet Address: 134 South Penn AvenueCity/State/Zip: Harrisville WV 26362**COMMENTS/SUGGESTIONS****§126-28-1. General.**

In general, I'm not sure that policy writers were aware of the many counties that are already meeting or exceeding the opportunities for Pre-K students sought in this policy. Braxton, Gilmer, Calhoun, Ritchie and many others already have quality programs in place, either primarily within the school system or in collaboration with community providers. Some components of 2525 will cause unnecessary upheavals in those programs and will not result in improved programming for 4-year olds in many of those counties.

Please Charleston, for this policy and future policies – just do the following – **TELL US WHAT THE EXPECTATIONS ARE, HOLD US ACCOUNTABLE FOR MEETING THE EXPECTATIONS, THEN DEAL WITH THOSE SYSTEMS WHO DON'T.** Please refrain from the futility of trying to prepare a state “how to” model that will fit all 55 diverse counties – You can't do it and you especially can't do it when you're not aware of how current programs are working in the 55 counties, and you get no input from the counties, as is the case with policy 2525.

At the very least, I would encourage the State Board to delay the requirement of a completed county plan until some answers can be developed to critical questions posed by public school and community-based early childhood educators across our state.

§126-28-2. Guidelines.

§126-28-3. Definitions.

3.7. *Minimum program availability* means offering each preschool class a minimum of three consecutive days/week for at least three and one half hours per day during the school year calendar.

This requirement unnecessarily restricts logistical and transportation options for rural counties. The argument that non-consecutive days create multiple “Monday effects” has some merit, but no more than saying the resultant four-day weekends created by “three consecutive days” will create “summer drop-off” - every week. Tell us the minimum number of hours per week – we need the flexibility.

§126-28-4. Parent/Guardian Involvement and Family Support.**§126-28-5. Attendance.****§126-28-6. Collaboration and the County Plan.**

maximize existing resources and collaborate with other providers of early childhood education

Yes, we should.

no less than 50% of the classrooms for eligible children must be provided through contracts with community programs, including but not limited to Head Start and child care

Maybe not that bad an idea for those counties like Kanawha or Wood that have a long way to go in offering quality opportunities to 4-year olds. But what about the counties that 90% + are already getting 2525 level services. Please endure this example: Gilmer County has served virtually all county 4-year olds for several years, four days per week in quality programs. What if now the local church wants to be one of the 50% classrooms – it has the new beautiful facility – it can meet all 2525 regs – and it wants to have access to the kids for both state approved curriculum and religious instruction. Will the GCBOE be forced to collaborate with this new partner to transfer a quality service it already provides to this new community provider and flow the money (Note there are no additional dollars in this scenario because there are no additional kids) to the church? I believe 2525 says that GCBOE has no choice. This is not totally a “what if”. I know Gilmer’s program and I belong to the church that just might be interested.

§126-28-7. Waivers.**§126-28-8. Personnel Standards.**

This section might be referred to as the “lawyers full employment act”. Questions regarding, permitting, displacement, seniority, hiring, evaluation, etc. were rampant at our RESA V meeting regarding 2525. Although there were questions aplenty – there were no answers.

§126-28-9. Regulation of Facilities.

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

§126-28-11. Curriculum and Assessment.

11.1. Only curricula and curriculum enhancements that are included on the list of accepted curricula and curriculum enhancements may be used by programs participating in the county plan.

How many church providers will be willing to accept all the additional state requirements of 2525 and then allow “only” state curricula? Not many I believe.

§126-28-12. Transition and Continuity.

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. **Yes – Okay.**

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. **Yes – they should.**

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. **Whoa – we shall not limit their choices? – as determined by who? There is no guaranteed school choice in grade K-12 in WV yet we work with parents and generally do quite well. Maybe the Pre-K group is a tougher group. Seriously, there are some real negative possibilities inherent in this phrase. If the school system has a program in town A with 19 kids in it and a program in town B with 11 kids in it – a parent from town B can unilaterally move their child from program B to program A (there is one slot left), simply because grandma can pick up the child after school on the way home from therapy? Enough said.**

§126-28-13. Inclusive Environments.

13.2. County plans will not develop classrooms that segregate children on the basis of socioeconomic level, ability, and/or funding streams.

What does this mean? No more stand alone Headstart Programs (participation is based on socioeconomic status)? Can the county board not have any stand alone school-based classrooms (funding stream)?

126CSR28

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

14.3. Every early education teacher and aide must complete a total of 45 hours of training based upon the curriculum/assessment standards over a 24 month period and provided by the employer or made accessible through the county collaborative plan for professional development. These 45 hours of training will satisfy the 18 hours annual training requirement for the year in which the training is received and the two subsequent years

**Newly employed? Everyone? As of when? Some yet to be determined beginning date? So in this three year period of time Pre-K people are required 45 hours but everyone else is required 54 hours. Are Pre-K people excepted from other required CE? What happens if trained employee leaves the system, etc. etc.
Strike this whole confusing unneeded paragraph.**

§126-28-15. Transportation.

§126-28-16. Program Oversight.

§126-28-17. Financing.

§126-28-18. Health and Safety.

18.6. WV Pre-k classrooms shall provide useable floor space of at least 35 square feet per child and available for children's activities, exclusive of halls, bathrooms, the kitchen, office space, or storage areas. Useable outdoor play space of 75 square feet per child shall be provided.

Used as an example – this requirement, along with several others in the personnel and curriculum sections will virtually guarantee the loss of number of good community partners across our state. In one section of Policy 2525 we mandate 50% participation and other sections we throw up roadblocks for community partners to remain involved.

§126-28-19. Program Evaluation.

Please Mail the Completed Comment Form to:
Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

Vicki Moss

From: Cathy Jones [ctrjones@access.k12.wv.us]
Sent: Tuesday, December 03, 2002 9:24 AM
To: Vicki Moss
Subject: FW: Policy 2525 Comments



2525comments.wpd

=====
Cathy R.Jones, Ed.D.
Coordinator Early Childhood/Even Start
Building 6, Room 318
1900 Kanawha Blvd.East
Charleston, WV 25305-0330
Phone 304-558-2691
Fax 304-558-6268
ctrjones@access.k12.wv.us

-----Original Message-----
From: Mark Colaw [mailto:mcolaw@hotmail.com]
Sent: Friday, November 22, 2002 4:50 PM
To: ctrjones@access.k12.wv.us
Subject: Policy 2525 Comments

Dear Kathy,

Attached are my comments regarding 2525. I really appreciate all your hard work on this initiative!

Mark

Help STOP SPAM with the new MSN 8 and get 2 months FREE*
<http://join.msn.com/?page=features/junkmail>

Mark E. Colaw
Executive Director
EACHS Head Start
2 Hyre Ave.
Petersburg, WV 26847

126-28-1 General

2.1.1 - I would like to see children that are three years old that are eligible for Head Start be included in the eligibility criteria. We have included children that are eligible for 2419 services because they have special needs. Numerous studies have been done that show children that live in poverty have less opportunities and are more developmentally delayed than other children with different economic backgrounds. There are also some rural areas that will not have enough 4 year old children to make up the classroom numbers needed to collaborate with Head Start programs. In these communities both the four and three year old's may not have access to services provided under 2525.

As far as all the other standards in this area, they should be maintained in the final draft of the policy.

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

In general, I would like to see the final draft include all the existing standards. A strong parent involvement component can only enhance the opportunities for children to learn and grow. Although I would like to see a formal structure that allows parent participation in decision making, this is a good start and hopefully the role of parents in program planning and decision making can be expanded in the future.

126-28-6 Collaboration and the County Plan

I think this is the most critical section of the policy and will also be the most difficult to implement. However, without collaboration there's no way we will be able to effectively streamline services and maximize resources. It's my hope that nothing will be removed from this section especially the 50% rule.

126-28-8 Personnel Standards

In order to support the integration of early childhood education and care programs, we will need to initially have a system that recognizes various levels of staff qualification requirements. The standards for personnel included in Policy 2525 are inclusive and recognizes early childhood certification at various levels. In addition to providing flexibility that will be needed to get these programs started under collaborative models, this system will establish a process that is unified for the future. My hope is that nothing will be removed from this section.

126-28-9 Facilities

I support the standards included in this section and would encourage that the existing requirements be maintained. I would prefer to see a limit of at least 20 children per classroom setting.

126-28-10 Standards for Preparing Students

Although I support the adherence to the Head Start Outcomes Framework, it's my suggestion that the Department of Education develop new standards for learning for children that are pre-school age. These standards should recognize that children learn and grow at different rates and be developmentally appropriate.

126-28-11 Curriculum and Assessment

I support the existing standards and would encourage that they be maintained in the final draft of the policy. However, I also think that it would be beneficial to allow counties to be able to submit locally designed curriculum's and assessments for consideration and use within that county.

The current policy doesn't allow this.

126-28-15 Transportation

Although I personally believe that if counties provide transportation services more children will participate in this program. In the event that they do provide transportation, it would be provided in compliance with WV transportation regulations as well as federal standards.

Vicki Moss

From: Cathy Jones [ctrjones@access.k12.wv.us]
Sent: Tuesday, December 03, 2002 9:23 AM
To: Vicki Moss
Subject: FW: QI and Curriculum Comments Policy 2525



QICommittee
Comments.wpd

=====
Cathy R. Jones, Ed.D.
Coordinator Early Childhood/Even Start
Building 6, Room 318
1900 Kanawha Blvd. East
Charleston, WV 25305-0330
Phone 304-558-2691
Fax 304-558-6268
ctrjones@access.k12.wv.us

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

From: Ann Nutt [mailto:annnutt@wvdhhr.org]
Sent: Monday, November 18, 2002 9:22 AM
To: ctrjones@access.k12.wv.us
Subject: QI and Curriculum Comments Policy 2525

Attaching comments from Policy 2525. Have questions and need to touch base when we can.

Thanks
ann

Policy 2525 Comments

PIECES Quality Initiatives and Curriculum Committee

§126-28-10

Strengthen the language to insure appropriate intent and use of CSO for Pre-k is clear. Information such as, "The CSO document is not intended to become a checklist for making decisions regarding children's readiness to move to kindergarten. Children should be assessed on a continuum, noting where they began and where they were able to progress."

If the expectation exists that the assessment process used in classrooms specifically measure the progress on the CSO direction and comment regarding that should be made. This would have implications on what about assessment in a comprehensive curriculum is reviewed and what assessment tools would be selected as appropriate (see next section) so clear expectation may be useful.

§126-28-11

11.1

Consider establishing in policy a transitional time frame for developing an approved list of curricula and to allow counties time to select curricula. Suggest that for the 2003-2004 school year counties with classrooms in operation use curriculum standards in the policy as a guide, as well as curricula on the Educare Approved Curricula List. Possibly then counties should have selected an approved curricula by the 2004 -2005 school year and have identified a training process for staff to learn to implement the curricula.

In 11.2 it is noted that assessment processes are to be approved using the WV Department of Education process. If there will be an approval process, an expectation of use of only approved tools should be stated.

A clearer definition of approved enhancements may be useful or consider a suggested list of enhancements with the expectation (stated in the policy) that any enhancements used "fit" and serve to support the comprehensive curriculum and that the curriculum standards are followed appropriately. For example, an enhancement that uses centers but scripts what children must do in the centers is not enhancing an appropriate curriculum. But a resource book describing current literacy research and ways to implement it appropriately would.

11.2

Suggest changing "assessment processes" to assessment tools.

Consider the implications and logistics of curriculum enhancements using the full Department of Education process. Potentially a recommended list could be developed.

The sheer numbers of supplemental materials available makes this a difficult task. The definition of enhancement may be critical. It might be useful to add language that enhancements must support the philosophy and methods of the comprehensive curriculum, and not supplant or replace them .

Consider the implications and logistics of full approval process for assessment tools. If tools must assess progress on all CSO the currently available published tools may not totally correlate.

§126-28-19 Program Evaluation

19.1

Suggest adding language that indicates that a teacher should not self-assess their own classroom on the ECERS. The county plan should include a joint process for evaluation of some nature.

Vicki Moss

From: Cathy Jones [ctrjones@access.k12.wv.us]

Sent: Tuesday, December 03, 2002 9:21 AM

To: Vicki Moss

Subject: FW: Policy 2525 comments

Cathy R.Jones, Ed.D.
Coordinator Early Childhood/Even Start
Building 6, Room 318
1900 Kanawha Blvd.East
Charleston, WV 25305-0330
Phone 304-558-2691
Fax 304-558-6268
ctrjones@access.k12.wv.us

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

From: Jane Lynch [mailto:jelynych@access.k12.wv.us]

Sent: Wednesday, November 20, 2002 10:32 AM

To: ctrjones@access.k12.wv.us

Subject: Policy 2525 comments

I have added a comment to 12.1. Please replace my earlier copy.

12/3/02

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Jane Lynch, Federal Programs Director

Title: Business: Calhoun County Schools

Street Address: RR 1 Box 1E

City/State/Zip: Grantsville, WV 26147

COMMENTS/SUGGESTIONS§126-28-1. General.

§126-28-2. Guidelines.

§126-28-3. Definitions.

3.7 Program availability is defined as a minimum of 3 consecutive days/week for at least 3 ½ hours. This will be drastic change to the program our county currently provides, nor do I believe it is the best use of dollars. We currently offer full day programs, with a combination of days per week, depending on the child's needs and ages. Students currently attend from 660 to 1330 minutes per week. Our parents prefer their children to attend full days. This allows childrent to participate in special events, trips, and activities that are offered at each school. Due to the areas our school buses currently travel, it would not be time effective to use any mode of transportation that is currently used by Head Start. Our county could not afford to add a midday run for only preschool children. Suggestion-- look at minutes per week, rather than consecutive half days proposed policy guidelines.

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

§126-28-5. Attendance.

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

I have issue with 6.2, in that the county plans will be approved by the DHHR. As a local administrator, I have found and history supports that a “man cannot have two masters”. Throughout this policy, the lines of responsibility are cloudy. We, as a county, have been working collaboratively with all available agencies, for the education of our children. We do at times meet resistance with other agencies, but we continue to work on that relationship. Without clear direction and definition of who answers to whom, the current outline of reporting to two agencies does not properly address the spirit of collaboration.

6.4 in which “no less than 50% of classrooms . . provided through community programs”. This would tie the hands of providing a quality education program for all four-year olds. Our county has offered services to all students, whether they are currently in the county preschool/preschool handicapped program. Currently we have 4 preschool and/or preschool handicapped classrooms. We have collaborated with Head Start. The State should research existing programs prior to the development of this policy. We established our program over 10 years ago, and keep adapting it to meet the needs of our families. Changing our program to meet the regulations in the policy will be regressive to our program.

§126-28-7. Waivers.

§126-28-8. Personnel Standards.

The guidelines set forth in this section are the most disturbing of the entire policy. Our state has set for high standards for the education of children. No Child Left Behind repeatedly uses the term, “highly qualified teachers” which this policy in no way supports. This proposal will allow persons with an associate degree and one year of experience to be permitted to become a certified preschool teacher. Our current teachers certainly exceed this benchmark. For any school system to be forced to accept teachers on permit, with less training than our paraprofessionals is ludicrous. We have the range of paraprofessionals with Masters Degree through Associate Degrees. They currently hold a paraprofessional certification and have been working as paraprofessionals in early childhood classrooms for several years. Compare this to the degree level of Head Start and Private Day care “teachers”. Local resources of certified teachers in early learning centers outside schools, is non existent.

§126-28-9. Regulation of Facilities.

Again, under this portion of the policy, public schools are to be held accountable for the implementation, but DHHR Licensing staff will monitor, then report to the OEPA.

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

§126-28-11. Curriculum and Assessment.

§126-28-12. Transition and Continuity.

12.1.7 states that placement shall not be limited to the local school district in which a child lives, if openings are available. Counties already have procedures for accepting children. Utilize these. Also the language needs to be changed from *shall* to *may*. School districts must be able to administer to the greater good, and the policy must provide that flexibility.

§126-28-13. Inclusive Environments.

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

14.3 states that every early education teacher and aide must complete 45 hours of training over a 24 month period. It also states that these 45 hours of training will satisfy the 18 hour annual training, plus 2 years. It appears the intent of this regulation is to provide under qualified permitted "teachers" the opportunity to take classes without the expectation to attend training with their peers. Of any staff members who would need training, the ones on permit need it the most. The state of WV currently requires all personnel to receive 18 hours per year of approved continuing education. Particularly with new employees or permitted teachers, this is counter productive. Our systems have problem now finding the time to deliver quality staff development. We also have difficulty providing substitutes to cover classes for teachers to attend training and now the requirement that all early education teachers and aides attend 45 hours per 24 months would be inconsistent if not impossible. Nor would it be advisable for the children to have both their teacher and aide away from the class at the same time. The

students need to feel that safety and consistency in their programs.

§126-28-15. Transportation.

§126-28-16. Program Oversight.

§126-28-17. Financing.

The collaborative plan is to explain how the monies generated from the program will be used to support programs in the county. Where will the monies come from to fully implement services, if they are not generated through the changes in this program? There do not seem to be other funds designated other than current funding sources. Starting or changing programs can be expensive.

§126-28-18. Health and Safety.

§126-28-19. Program Evaluation.

19.1 designates the use of an ECERS assessment. An evaluator will evaluate the program. It needs to be clear that this cost will not be forwarded to the counties.

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start

Office of Instructional Services

West Virginia Department of Education

Capitol Building 6, Room 318

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us

Fax No.: (304) 558-6268

Vicki Moss

From: Cathy Jones [ctrjones@access.k12.wv.us]
Sent: Tuesday, December 03, 2002 9:24 AM
To: Vicki Moss
Subject: FW: Policy 2525

=====
Cathy R. Jones, Ed.D.
Coordinator Early Childhood/Even Start
Building 6, Room 318
1900 Kanawha Blvd. East
Charleston, WV 25305-0330
Phone 304-558-2691
Fax 304-558-6268
ctrjones@access.k12.wv.us

-----Original Message-----
From: Cyndi Fizer [mailto:cfizer@access.k12.wv.us]
Sent: Monday, November 25, 2002 9:20 AM
To: ctrjones@access.k12.wv.us
Subject: FW: Policy 2525

Cathy

Please see below. I was told you were the person who needed to receive this information.

Cyndi

Cyndi Fizer
cfizer@access.k12.wv.us
Office of Technology
WV Department of Education
1900 Kanawha Blvd., E., B-346
Charleston, WV 25305

304-558-7880 - V
304-558-2584 - F

-----Original Message-----
From: otis@access.k12.wv.us [mailto:otis@access.k12.wv.us]
Sent: Sunday, November 24, 2002 4:17 AM
To: cfizer@access.k12.wv.us
Subject: Fwd: Policy 2525

Cyndi:

I am at home - please forward this to whomever it should go at the WVDE.

Phyllis J.

Forwarded Message:
> To: <otis@access.k12.wv.us>
> From: "Janice Barnett" <jbarnett@npheadstart.org>
> Subject: Policy 2525
> Date: Thu, 14 Nov 2002 16:39:36 -0500
> -----

> Janice Barnett
> Education Supervisor
> Northern Panhandle Head Start
> Wheeling, WV
>
> I believe that Policy 2525 will be an excellent collaboration with all
> parties having a major role in the success of 4 year old preschool in our
> state.
>
> I support Policy 2525 and I would like to add the following comments:
>
> 1. 126-28-3 Definitions
> Page 3
> 3.7
> I agree that the preschool class should be a minimum of 3 consecutive
> days/week for at least 3 1/2 hours per day. I strongly urge that the
> preschool program should be 4 consecutive days/week for at least 3 1/2
hours
> per day during the school year calendar. I have been an educator for
early
> child care for 20 years and I have taught in several different models. I
> have found the 4 day model to be the most successful for the children.
>
>
> 2. 126-28-4 Parent/Guardian Involvement and Family Support.
> Page 3
> I strongly support requiring each county plan to address how they will
work
> with the family. It is imperative that we have strong family
relationships.
> I am hopeful that if we build the bond with the family in the new
pre-school
> plan it can continue to grow throughout the elementary school years. I
> recommend the Parent Literacy Program where we provide a program that will
> enable all parents to achieve literacy. I think that teachers should make
2
> home visits per year, one at the beginning of the school year to meet the
> family in the comfort of their home, and one at the end of the year to
> discuss child's successes in pre-school and to provide necessary
information
> that will help the child transition into Kindergarten. I recommend 2
> Parent/Teacher Conferences in the classroom so that the families can see
the
> child's classroom environment and discuss what happens in the child's
school
> day. I also recommend Family Activity Nights where all of the families
can
> join together for an evening of fun. I recommend Parenting Classes to
> enable the families to meet the growing needs of the children and
families.
>
> 3. 126-28-6 Collaboration and County Plan.
> Page 4
> I strongly support 50% of the classrooms for eligible children be
provided
> through contracts with community programs. I believe that it is essential
> to collaborate to meet the needs of all families, whether it be a child
care
> setting, Head Start center, or public school setting. I believe that all
> programs should meet state licensing standards, Head Start Performance
> Standards, low student/teacher ratio, and highly qualified,
developmentally
> appropriate staff.
>
> 4. 126-28-8 Personnel Standards
> Page 6
> I support sections 8.2 and 8.3 for qualifications and the full-time

permit

> to assure qualifying certification endorsement of personnel. It is
> essential that the teachers in the pre-school program be qualified in
early
> child development.

>
> 5. 126-28-11

> Curriculum and Assessment

> Page 7

> It is essential that we have a committee of public school staff, Head
Start

> staff, and child care staff, and parent committee to choose a
> developmentally appropriate to enable the child to succeed. We must
follow

> NAEYC and ERSER guidelines for the highest quality program which will be
> rich in whole child curriculum, emerging skills, pre literacy skills,
> continuum of development, readiness program, transition, and character
> curriculum.

>
> 6. 126-28-9 Regulation of Facilities and 126-20-18 Health and Safety
> Page 7 - 9.1

> I strongly agree that all preschool classrooms must meet WV Division of
> Health Legislative Rules Child Care Centers 64CSR21.

>
> 18.7 - WV Pre-k classrooms shall limit classrooms to 20 children,
> preferably 18 children. Ratios shall be maintained at 1 adult: 10
children

> with 1 adult being a certified teacher. A classroom aide will be
provided
> for children with special needs.

>
> Performance Standards 1304 and 1306 - We must maintain the most
stringent

> of regulations for the Safety and Health of Enrolled children by meeting
> State Licensing Regulations or the Head Start Performance Standards at a
> minimum.

> I strongly urge requiring all programs serving 4 year old children in a
> pre-k setting to meet the West Virginia Department of Health and Human
> Resources Child Care Licensing Regulations. I also support the OEPA of
the

> State Dept. of Ed in enforcing any correctional action plans identified
> through the Department of Health and Human Resources monitoring process.

>
> I truly believe that if each group works together as a team and bring
the

> best of all groups into the structure, we will have the best 4 year old
> program. However, we must come together with our goal being what is best
> for children and families with total support for each group. I believe in
> the policy and I will work in any capacity to make it work.

Vicki Moss

From: Cathy Jones [ctrjones@access.k12.wv.us]
Sent: Tuesday, December 03, 2002 9:21 AM
To: Vicki Moss
Subject: FW: My Comments on 2525



WV 2525 comments to
CJones.doc...

=====
Cathy R.Jones, Ed.D.
Coordinator Early Childhood/Even Start
Building 6, Room 318
1900 Kanawha Blvd.East
Charleston, WV 25305-0330
Phone 304-558-2691
Fax 304-558-6268
ctrjones@access.k12.wv.us

-----Original Message-----
From: Elmore, Nancy (ACF) [mailto:nelmore@acf.hhs.gov]
Sent: Wednesday, November 20, 2002 10:43 AM
To: 'ctrjones@access.k12.wv.us'
Subject: My Comments on 2525

Hello Cathy,

Attached are my comments on the policy. They're identical to Dave Lett's.

Nancy

<<WV 2525 comments to CJones.doc>>

November 20, 2002

Note to Cathy Jones

I am forwarding my comments on proposed Policy 2525. They are identical in content to David Lett's comments.

Nancy Elmore
Head Start Branch Chief
Region III, ACF

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

4.1 – We wholeheartedly concur with the importance of the involvement of parents in the education of their children, as reflected in this section. To further underscore the value of parent involvement in preschool programs, you may wish to add language to this section that encourages pre-kindergarten programs to welcome parent involvement in the classroom. Such language might parallel the Head Start performance standards, which require that classrooms be open to parents during program hours. Parents must be welcomed as visitors and encouraged to observe children in the classroom and to participate with children in group activities.

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

6.4 – We applaud the effort to maximize existing resources by requiring that 50% of the pre-kindergarten classrooms be served through contracts with community providers. This provision will encourage valuable partnerships between local school systems, Head Start, and child care – building upon the strengths and unique features each has to contribute. It will also ensure that new programs are not created where there is already a qualified provider in the community, eliminating the potential for duplication of services and competition for slots. For the same reasons, we also support the requirement that a portion of the funds generated by the formula be used through the contractual agreements to support compliance with this policy.

126-28-7. Waivers.

7.2 – We recommend that county requests for waivers contain the written concurrence of the core community partners who would normally make up the local planning team.

126-28-8. Personnel Standards.

8.1& 8.2 – We support the mandate that teachers of preschool children be certified in early childhood education or closely related fields, such as preschool special needs. The research clearly demonstrates that it is not effective to teach four year-olds in the same manner as older aged children. Research shows that a “push-down” to pre-kindergarten of methods and materials used in elementary school or middle school is inappropriate for preschool children, and can actually be harmful to them. The challenge for preschool teachers is to develop classroom activities that teach while engaging and developing children’s interests. This provision would prohibit the transfer of displaced teachers from higher grades to preschool classrooms without first obtaining the credentials necessary to teach four year olds. We urge you to retain this provision in the final policy.

8.2 – The provision of full time permits for experienced early childhood educators who do not hold one of the three qualifying degrees cited in section 8.1 is critical to the success of this initiative. This is the vehicle that will enable community providers to collaborate successfully with local school systems in making universal pre-kindergarten a reality. This provision underscores the relationship between teacher qualifications and classroom quality, while at the same time providing a window of opportunity that enables experienced, high performing teachers in community programs such as Head Start and child care to proceed along a continuum of professional development toward a qualifying certification. We urge you to retain this provision in the final policy.

126-28-9. Regulation of Facilities.

9.1 – We support the requirement that all programs serving preschool children meet West Virginia licensing standards, and encourage you to retain this provision in the final rule.

126-28-11. Curriculum and Assessment.

11.1 through 11.6 – We fully support this “whole child” approach to curriculum and assessment. These research based standards recognize the cognitive, physical, social, emotional and health needs of preschool children. The level of detail provided in this section lays the groundwork for quality pre-kindergarten programs that support school readiness across a broad spectrum of providers, and safeguards against the “push-down” of elementary school methods and materials in teaching pre-k children. We highly recommend the retention of this entire section in the final policy.

126-20-18. Health and Safety

18.7 – We strongly concur with the limitation on classroom size to twenty children, and with the 1:10 ratio of adults to children. The benefits of these standards reach well beyond the important and obvious health and safety considerations. Research has shown that small classrooms and adequate teacher/child ratios are critical to the quality and success of early childhood education programs. Furthermore, these standards will facilitate Head Start’s ability to partner with local school systems, since the standards are consistent with Head Start requirements that set the average class size at seventeen to twenty, with no more than twenty children per classroom. Similarly, the 1:10

teacher/child ratio will also facilitate Head Start's ability to serve as a community program, since Head Start classes must be staffed with two adults – a teacher and an aid or two teachers and, whenever possible, a volunteer. Any increase in the class size or teacher/child ratios proposed in this policy would pose a barrier to Head Start's participation in the universal pre-kindergarten system.

Vicki Moss

From: Cathy Jones [ctrjones@access.k12.wv.us]
Sent: Tuesday, December 03, 2002 9:26 AM
To: Vicki Moss
Subject: FW: Policy 2525

Cathy R. Jones, Ed.D.
 Coordinator Early Childhood/Even Start
 Building 6, Room 318
 1900 Kanawha Blvd. East
 Charleston, WV 25305-0330
 Phone 304-558-2691
 Fax 304-558-6268
 ctrjones@access.k12.wv.us

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

From: Ruth Ann Ponzurick [mailto:raponzurick@ncwvcaa.org]
Sent: Friday, November 22, 2002 10:29 AM
To: ctrjones@access.k12.wv.us
Subject: Policy 2525

Cathy,

First of all I would like to thank you & Kay Tilton for the many opportunities that have been provided for the Head Start Programs to participate on committees and/or be part of avenues to keep communication available of the evolving Policy 2525.

Comments on Policy 2525:

I concur with the sections as written with the exception of additional comments as follows:

126-28-6 Collaboration and the County Plan

Page 4. 6.4

I *strongly* support that a minimum of 50% of the four year old classrooms be contracted to community programs meeting the standards in this policy to provide the classroom space, qualified staff and financial resources unless the county collaborative team can document otherwise supported with written permission both to the Department of Education and the Secretary of the WV Dept. of Health and Human Resources to approve this request.

126-28-9 Regulation of Facilities

Page 7. 9.1

I support requiring all programs serving four year children in a pre-k setting to meet the WV Department of Health and Human Resources Child Care Licensing Regulations. I also support OEPA of the State Department of Education in enforcing any correctional action plans identified through the DHHR monitoring process. I think we need to know what this means. How much "teeth" is in this???? or I'm not sure who would be responsibility for this, but should the law be changed to "equalize" the playing field with BOE & no longer be exempt for this licensing requirement.

12/3/02

126-28-13 Inclusive Environments

Page 12. 13.1-13.2

I'm concerned that many of the school systems are lag in providing inclusive classrooms & this could provide an additional challenge with collaborations.

126-28-15 Transportation

Page 13. 15.1-15.3

I *strongly* feel that if the BOE is mandated to provide a universal pre-k program, that they should be responsible to provide this service.

I do not believe it specifically identifies in Policy 2525 that additional compensation by a BOE would be paid to Teachers that would be hired by another agency. This could become a Human Resource nightmare especially for Community Action Programs that operate multiple counties. For example, we would have Teachers being paid different salaries per county. Then, if the teacher receives additional monies, what about the Food Service, Teacher Aide, Bus Drive etc. that feels they should be paid at the BOE rate? I would suspect that this could cause grievances/lawsuits within the BOE when they contract with another agency while having their Teachers on a RIF list or those that feel they are equally qualified for the job?

I'm not sure that you have an answer for this, but to raise awareness of how the community partner may be struggling to handle.

Thank you for your consideration on my comments.

Respectfully submitted,

Ruth Ann Ponzurick

Children Services Director

Vicki Moss

From: Cathy Jones [ctrjones@access.k12.wv.us]
Sent: Tuesday, December 03, 2002 9:26 AM
To: Vicki Moss
Subject: FW: Comments on Policy 2525

Cathy R. Jones, Ed.D.
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-----Original Message-----

From: Bobbi Thomas-Bailey [mailto:bobbi@rccaa.org]
Sent: Thursday, November 21, 2002 3:25 PM
To: ctrjones@access.k12.wv.us
Subject: Comments on Policy 2525

Attached for you consideration are comments on Policy 2525. Thank you.

Bobbi Thomas-Bailey
Executive Director
Raleigh County Community Action Association
(304)252-6396
bobbi@rccaa.org

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Bobbi Thomas-Bailey

Title: Business: Executive Director, Raleigh County Community Action Association

Street Address: P.O. Box 3066

City/State/Zip: Beckley, WV 25801

COMMENTS/SUGGESTIONS§126-28-1. General.

§126-28-2. Guidelines. No Comment

§126-28-3. Definitions. No Comment

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

4.1.6: There needs to be clear guidelines detailing the amount of parental participation in the decision making process. Guidelines should indicate how parents will participate in the process and should detail impasse procedures should there be conflict between parents and the program providing services.

§126-28-5. Attendance.

5.1 If four-year olds are required to follow West Virginia Code regarding attendance, their attendance should be counted when determining the school's attendance rate.

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

6.4 It is essential that this section of the policy remain as it is written. At least 50% of classrooms must be provided through contracts with existing providers. If this does not take place, private preschools and Head Start Centers throughout the state will be forced to close, causing the price of providing universal pre-K education to be prohibitive even to the wealthiest of states.

§126-28-7. Waivers.

No Comment

§126-28-8. Personnel Standards.

8.2.2 – 8.2.3 This section must remain as it is written. Head Start has been operating successfully since 1965 without certified teachers. It would be detrimental to any program to disallow trained, experienced staff from gaining temporary certification while pursuing the necessary degree.

§126-28-9. Regulation of Facilities.

No Comment

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

No Comment

§126-28-11. Curriculum and Assessment.

11.6 It is important that this section remains as written to ensure that the program remains a pre-K program, rather than watered down kindergarten.

§126-28-12. Transition and Continuity.

No Comment

§126-28-13. Inclusive Environments.

No Comment

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

No Comment

§126-28-15. Transportation.

15.1 Transportation should be mandatory for universal pre-K programs. If transportation is not provided the number of children that will be able to participate will be limited.

§126-28-16. Program Oversight.

No Comment

§126-28-17. Financing.

No Comment

§126-28-18. Health and Safety.

No Comment

§126-28-19. Program Evaluation.

No Comment

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start

Office of Instructional Services

West Virginia Department of Education

Capitol Building 6, Room 318

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us

Fax No.: (304) 558-6268

**West Virginia Department of Education
1900 Kanawha Boulevard East
Charleston, WV 25305**

([Phone List by Topics](#)) ([Staff Phone and Email by Name](#)) ([School Directory](#))

For suggestions, questions, problems contact the [webmaster](#)
Please read our [disclaimers](#)

Vicki Moss

From: Cathy Jones [ctrjones@access.k12.wv.us]
Sent: Tuesday, December 03, 2002 9:20 AM
To: Vicki Moss
Subject: FW: Comments on Policy 2525

=====
Cathy R. Jones, Ed.D.
Coordinator Early Childhood/Even Start
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-----Original Message-----
From: PriceRA15@aol.com [mailto:PriceRA15@aol.com]
Sent: Wednesday, November 20, 2002 9:10 PM
To: ctrjones@access.k12.wv.us
Subject: Comments on Policy 2525

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System
I agree with section 6.4.6.4. In order to support counties in the effort to maximize existing resources and collaborate with other providers of early childhood education, no less than 50% of the classrooms for eligible children must be provided through contracts 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 or cannot meet the mandates of this policy. 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 community settings. This ratio of community to public school providers can only be decreased with the written permission of both the West Virginia Board of Education and the Secretary of the West Virginia Department of Health and Human Resources. 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. 126-28-4 Parent/Guardian Involvement and Family Support I believe that each family must have a pre-enrollment home visit by the preschool teacher and assistant in addition to two parent-teacher conferences. I agree with 126-28-8, 8.1, 8.2, 8.2.1, 8.2.2, 8.2.3, 8.3 §126-28-8. Personnel Standards. 8.1. Teachers must hold a qualifying certification/endorsement for teachers, specifically, early education, Pre-k-k endorsement, or birth to five. 8.2. A full time permit shall be issued and valid for one school year and shall expire on the thirtieth day of June. 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

A handwritten signature in black ink, appearing to read "J. Stant", is located on the right side of the page, overlapping the end of the main text block.

within five years of the original issuance of the Full-Time Permit. See 126CSR136, West Virginia Board of Education Policy 5202 - Minimum Requirements for the Licensure of Professional/Paraprofessional Personnel and Advanced Salary Classification, Section 15. Full time permits will be issued for: 8.2.1. persons with degrees in preschool special needs, elementary education, child and family studies with an emphasis on early childhood education, or child development, or 8.2.2. persons with a Board of Regents degree with a specialization in early childhood/child development, or 8.2.3. persons with an AA in child development/early childhood or occupational development with an emphasis on child development/early childhood and one year of early education teaching experience. 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 West

Virginia State Registry and Training System (WV STARS) 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 0-1 years of experience and possess the ability to understand and practice the core competencies with direction and instruction or through sponsorship of a professional organization or qualified mentor (attached). Aides and assistants must have an individualized

staff development plan for specifying his/her planned progression on the career pathway toward level V. I agree that 9.1 should remain as it is. 9.1. All approved participating WV Pre-k programs, see definitions, that are included in the county collaborative plan must meet the requirements as set forth in the West Virginia Division of Health Legislative Rules Child Care Centers 64CSR21 or any rule promulgated to replace and/or update 64CSR21. Public schools or other programs who are exempt under West Virginia Division of Health Legislative Rules Child Care Centers 64CSR21 or its replacement must meet the requirements set forth in that rule. In the case of public schools, West Virginia Department of Health and Human Resources Child Care Licensing staff will conduct monitoring visits and any recommendations for action will be made to the Office of Education Performance Audits. I agree with 126-28-10, 10.1 §126-28-10. Standards for Preparing Students. 10.1. Programs participating in the county's collaborative plan must adhere to the West Virginia Department of Education content standards and objectives for eligible children's programs which are aligned with the Head Start outcomes framework and kindergarten content standards and objectives. The content standards and objectives for programs serving eligible children are written to reflect a level of performance that supports successful transition into kindergarten. I agree with 126-28-11 (11.1-11.6) §126-28-11. Curriculum and Assessment. 11.1. Only curricula and curriculum enhancements that are included

on the list of accepted curricula and curriculum enhancements may be used by programs participating in the county plan. 11.2. Curricula, curriculum enhancements and assessment processes will be approved following the process established by the West Virginia Department of Education, including, preschool special education, for adoption of instructional materials. 11.3. Curriculum and assessment, along with the content standards and objectives, will be parts of an inter-related system that measures the child's progress on a continuum of development and are utilized to individualize the children's educational opportunities. 11.4. Curricula 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:a. meeting the content standards and objectives for eligible children as prescribed by the West Virginia Board of Education.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, 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.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 morethan 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 compliment to, not substitute for, effective teaching or good curriculum. 11.4.12. include an assessment process 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 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, h. art, i. music. 11.6. Classroom design and program implementation for

eligible children must exclude the use of desks, mimeographed 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. I agree with 126-28-14 (14.1 through 14.3) §126-28-14. Staff Development and Training. 14.1. Each county plan will include a plan for providing a minimum of 18 hours annually for staff development related to high quality programming for eligible children based on a professional development needs assessment and including a minimum of six hours of education on inclusive environments. 14.2. Professional development opportunities will follow the West Virginia State Training and Registry System (S.T.A.R.S.) training process (attached). 14.3. Every early education teacher and aide must complete

a total of 45 hours of training based upon the curriculum/assessment standards over a 24 month period and provided by the employer or made accessible through the county collaborative plan for professional development. These 45 hours of training will satisfy the 18 hours annual training requirement for the year in which the training is received and the two subsequent years. I agree with 126-28-15 (15.1 through 15.3) §126-28-15. Transportation. 15.1. For programs participating in the county collaborative plan, transportation is considered a support, not a mandated service. 15.2. Participating programs should coordinate transportation systems to support families whose children would not otherwise be able to participate. 15.3. All participating programs must, at a minimum, follow the requirements of their primary funding source or the West Virginia Transportots document whichever is more stringent. I agree with all 126-28-16 §126-28-16. Program Oversight. 16.1. Local program oversight, 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. 16.2. The West Virginia Board of Education or its designee and the Secretary of the West Virginia Department of Health and Human Resources or his/her designee will maintain state oversight. 16.3. On or before the second day of January, 2004, the Secretary of the West Virginia Department of Health

and Human Resources and the West Virginia State Superintendent of Schools will submit a report to the Legislative Oversight Commission on Educational Accountability and the joint committee on government and finance which addresses, at a minimum: 16.3.1. a summary of the approved county plans for providing the early childhood education programs under this policy. 16.3.2. an

analysis of the total cost to the state and counties of implementing the

plans.16.3.3. a separate analysis of the impact of plans on counties with increased enrollment.16.3.4. an analysis of the affect of the programs on the

maximization of the use of federal funds for early childhood programs.16.4 On

or before the first day of December, 2004, and each year thereafter, the West

Virginia State Board of Education shall report to the Legislative Oversight Commission on Educational Accountability. I agree with 18.618.6. WV Pre-k classrooms shall provide useable floor space of at least 35 square feet per child and available for children's activities, exclusive of halls, bathrooms, the kitchen, office space, or storage areas. Useable outdoor play space of 75

square feet per child shall be provided.I agree with limiting the classroom size to no more than twenty children with a 1:10 adult-child ratio.18.7. WV Pre-k classrooms shall limit classroom size to no more than twenty children per classroom. Ratios shall be maintained at 1 adult: 10 children with one adult being a certified teacher in accordance with §126-28-8, Personnel Standards.I agree with 18.818.8. 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 West Virginia Department of Education child and adult food program. Programs operating less than four hours will provide a snack as prescribed the West Virginia Department of Education child and adult food program.I agree with 18.918.9. Immunization. All children entering

an approved participating WV Pre-k classroom that is participating in the county collaborative plan shall follow the guidelines of the primary (providing 51% or more of the funding that year) funding source regarding immunization. Participating programs that operate within a public school facility must follow West Virginia Code §16-3-4.I agree with 18.1018.10. Health Screenings. All children entering an approved participating WV Pre-k classroom that is participating in the county collaborative plan shall screen

children 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 West Virginia Code §18-5-17.I agree that ECERS should be used

as the self-assessment tool.§126-28-19. Program Evaluation.19.1. Beginning with the school year which starts in August 2004, all participating programs shall use the Early Childhood Environment Rating Scale (ECERS, Harms, Clifford, and Cryer, 1998) as a self-assessment tool to evaluate the programs

success in meeting the needs of the children. This self-assessment will be submitted annually by the 30th day of June to the West Virginia Department of

Education, Coordinator of Early Childhood, Building 6, Room 318, 1900 Kanawha

Boulevard, East, Charleston, WV 25305-0330.19.2. Programs will be assessed using the ECERS by a trained outside evaluator every five years or if concerns from the West Virginia Department of Education, West Virginia Department of Health and Human Resources or county board warrant assessment.19.3. At which time the state has money and manpower to provide

monitoring using the ECERS, programs may be required to have a trained outside evaluator evaluate the program more frequently.19.4. At which time a county has fully implemented their county collaborative plan and all eligible

children in that county have access to a WV Pre-k classroom, the county board

of education is required to annually submit a copy of the ECERS self-evaluation for each approved participating WV Pre-k program, a summary of the WV Pre-k services provided in the county, a collaborative agreement for each community partner providing services as an approved participating WV

Pre-k program provider, the total number of WV Pre-k children served in each

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 Early Childhood Coordinator of the West Virginia Department of Education, by the 30th day of June (format attached). A copy of the report must be sent by the 30th day of June to the West Virginia Department of Health and Human Resources, Early Childhood

Individual/Organization: Richard A. Price, College
Title: Business: Professor and Coach

Vicki Moss

From: Cathy Jones [ctrjones@access.k12.wv.us]
Sent: Tuesday, December 03, 2002 9:21 AM
To: Vicki Moss
Subject: FW: Comments on Policy 2525 from Glenn Jones

Cathy R. Jones, Ed.D.
 Coordinator Early Childhood/Even Start
 Building 6, Room 318
 1900 Kanawha Blvd. East
 Charleston, WV 25305-0330
 Phone 304-558-2691
 Fax 304-558-6268
 ctrjones@access.k12.wv.us

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

From: Glenn Jones [mailto:fdidirector@citynet.net]
Sent: Wednesday, November 20, 2002 11:52 AM
To: Cathy Jones
Subject: Comments on Policy 2525 from Glenn Jones

126-28-2 Guidelines

I have not heard any dissent on this point and I would say that this should stand as is as it is a very clear statement on what a program should look like.

126-28-3 Definitions

3.2 and 3.3

I agree with the definitions here but feel that school systems will seek to limit the number of partners that could be in a collaboration. Who makes the decision as to whom is part of the group that develops the plan, the Boards of Education or the group itself after it is formed? Boards will, I believe take a narrow interpretation of this and limit the number of participants. Also, I still believe that the word "contract" will continue to be misinterpreted and that the School Boards will see these as merely contracts between them and various entities and may not work with the collaborative group much beyond the formulation of the plan which, in their view, exists only to develop these "contracts". In our RESA meeting it became obvious to me that the Boards are using the word "contract" to also take more responsibility and direct dealings of the agencies with which they contract with rather than seeing this as a long term collaborative effort. Are these "contracts" between the collaborative group and the various agencies or between the Boards of Education and the various agencies?

3.6 This must stand as is.

3.7. I believe that the standard for minimum availability must stand as it is written.

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

This entire section should be kept exactly as is or strengthened to the Head Start Standards. This is what will differentiate this program from all other education programs. If this program does not have any positive impact on socializing children and families to accept public school in a more positive way than it should not exist at all. Whole families need to accept education as part of their lives and meaningful inclusion at the beginning of the

12/3/02

now 13 year process is crucial to the overall success of the child and the educational system as well. Children must also be physically and mentally ready to learn at the highest level possible.

126-28-6

6.4 I really don't know what to make of this 50% rule. While I believe very strongly that some number or ratio of participation is necessary to keep the Boards of Education from dominating the program I am not sure that a "hard" number of 50% is the way to go. Differing conditions and capacities in the counties may make it impossible to achieve that specific a number for a variety of very different reasons. Also, how universal is universal? If all children that are eligible in a county were to show up, how could this be handled? In Calhoun County for example, the public school has two classrooms and Head Start has one in which a total of 60 children are served. Let us imagine that the collaborative is highly successful and 120 children show up in September to go to school. My first question would be: Since this is a public school system program all comers would have to *have* to be enrolled, would they not? The second question then becomes where do the children go if one or the other of us does not have the capacity to take 60 children? I have heard an explanation that the classroom is defined by who is running it but not necessarily where it is. So let us say that Calhoun has the extra classroom but that to meet the 50% Head Start must run it. Where do I get the people to do that in a timely manner with my grant already specifying what my personnel needs are? And then throw in the added complication of what the qualifications of those teachers would have to be since technically they are in a public school. Perhaps that it is implied, but not stated, that 50% is a goal and should be achieved incrementally by 2012 and not necessarily before then.

126-28-8 Personnel Standards

The more I hear about this, the more confused I get. As I read it, A.A. degrees in early childhood can qualify and be "certified" and work under a permit. Board of Education personnel in several counties have told me this cannot be done as WV Law says certification can only be given to people with education degrees regardless of their specializations. This will certainly be contested by somebody. I do believe, however, that Head Start Teachers with A.A. degrees and years of teaching experience are the equal of many public school teachers regardless of the education of those public school teachers. Then some education people have said that the A.A. teachers could not physically work in a public school even in a collaboration setting. I firmly endorse the idea of this entry level system as I believe that our Head Start teachers deserve and qualify for a part in this collaboration. I do not feel that just being a certified teacher who hasn't taught pre-school in 15 years or at all should get consideration over a Head Start Teacher with experience and the minimum educational requirements as defined in 2525. Also, there may not be enough teachers to run this system at the level of universal service or close to that level. Paper degrees do not make good teachers in and of themselves and experience should somehow be reflected in this system.

126-28-9 Regulation of Facilities

This seems to be an area of hocus pocus. The DHHR people can inspect the schools but can't really do anything about it if they find them out of compliance but refer them to some agency. Some agency which apparently isn't getting the job done now is going to get a referral from DHHR and do what with it? Meanwhile, Head Start classrooms will continue to be put under threat of closure for conditions that are allowed to exist in public schools. If there are no teeth in the regulations and a collaborative cannot enforce these regulations on half of the collaborative, why go to the trouble of having this in 2525? I have advised the Head Start Association to seek legal advice as to suing the state over this in the past (I believe that it is a gross violation of the doctrine of equal protection and perhaps unfair competition) and will continue to do so. I am amazed that somehow kids packed into an inappropriate public school classroom will never burn to death but somehow they will in a Head Start classroom that could be closed down if one Exit sign is missing a bulb. Equal facilities means exactly that and not that some are just more equal than others.

126-28-15 Transportation

This is skipped in the rules. In my opinion you cannot have universal pre-school without transportation. This will need to be included as soon as possible to avoid a legal challenge. Head Start will not and cannot stop running buses to its sites. Is it not discrimination to run buses to only some classrooms and not others?

126-28-16 Program Oversight

A huge potential stumbling block that is left too much to the local collaboratives. If the classrooms are truly mixed and there are Head Start funded children everywhere I am still under the obligation to monitor the services given that child and evaluate that classroom and personnel. It is totally possible that I would have 5 children funded by Head Start in a public school classroom and I would have to evaluate the performance of that teacher and be able to take corrective action to get back into compliance with the Performance Standards. A clearer idea of how this is to be achieved is needed if not the specific stating of the fact that public school teachers would HAVE to accept this and the Boards of Education comply with it.

These are my major comments. On the whole I feel that the collaboratives will need a lot of guidance and have a source of definitive answers during this process. I am glad that steps are being taken for that guidance. We will also definitely need a conflict resolution process as there are already underlying currents of unrest and fear of job loss and diminished prestige. We all, and I include myself in this statement, have to learn to "play well with others" as my old report cards say. That is not a task easily achieved without guidance and mediation. I believe this system can work and will be better for the children in the long run and I thank you for your work and the opportunity to comment.

Glenn Jones
Director, Family Development, Inc. Head Start
Parkersburg, WV

To: Cathy Jones

From: Nikki's Child Development
Center

Re: Policy 25:25

258-1420

of Pages including cover

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Policy 2525

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Nikki's Child Development Center

Title: Business: Head Teacher 4's+5's

Street Address: 28 Ridersville Rd

City/State/Zip: Berkeley Springs WV 25411

COMMENTS/SUGGESTIONS§126-28-1. General.

§126-28-2. Guidelines. I agree on hiring staff that have education in early childhood. Also providing the right materials for the children. I feel that meeting the needs of the children is great.

§126-28-3. Definitions. I agree with 35 Developmentally Appropriate items in the classroom also along with the curriculum. Also being able to have the funding

§126-28-4. Parent/Guardian Involvement and Family Support. I feel that parent involvement is a great thing. It helps with communication between staff & parents. Also the parent/teacher conferences. That way the parents know how their child/children are doing

§126-28-5. Attendance.

I agree

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

Agree with 6.8

§126-28-7 Waivers.

The conditions all seem fair in order
to grant a waiver

§126-28-8. Personnel Standards.

I highly agree with 8.1 & 8.2.
Think those need to stay in there.

§126-28-9. Regulation of Facilities.

I agree they must meet
requirements

§126-28-10. Standards for Preparing Students. I think this will be great for children. The transition will be easier I think because they will already be used to a school setting and a classroom.

§126-28-11. Curriculum and Assessment. You need to do things that will keep the children's interest. Also agree on having fine motor + large motor activities. Having the right material out for children to explore. I agree on the different centers in the classroom.

§126-28-12. Transition and Continuity. I agree on 12.1.1 on having them visit the Kindergarten Classroom. Letting the parents know about things & when they are. Getting the Kindergarten teachers involved.

§126-28-13. Inclusive Environments.

It is important to have a need for all children to be included in the classroom.

They should be included but yet at the same time, maybe they can have another person come work with them.

§126-28-14. Staff Development and Training. *all staff should have training & Staff Development to learn more about the field. Helps with continuing education.*

§126-28-15. Transportation. *If transportation is being provided for those who need it, I think they should be on their own bus, not putt with the high school, or middle school kids.*

§126-28-16. Program Oversight. *I like providing early childhood education programs*

§126-28-17. Financing.

I think should be the same as other public facilities

§126-28-18. Health and Safety. *I highly agree.*

§126-28-19. Program Evaluation.

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start

Office of Instructional Services

West Virginia Department of Education

Capitol Building 6, Room 318

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us

Fax No.: (304) 558-6268

West Virginia Department of Education

1900 Kanawha Boulevard East

Charleston, WV 25305

(Phone List by Topics) (Staff Phone and Email by Name) (School Directory)

For suggestions, questions, problems contact the webmaster
Please read our disclaimers

To: Cathy Jones

From: Nikki's Child Development
Center

Re: Policy 25:25

258-1420

of pages including cover

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POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Anna Peck
Title: Teacher for Infants/Toddlers Business: Nikki's Child Development Center
Street Address: 348 N. Laurel Ave.
City/State/Zip: Berkeley Springs, WV 25911

COMMENTS/SUGGESTIONS

§126-28-1. General. I do not agree with sending a 4yr. old to kindergarten. If the child will be 5 in the school year then they should go to kindergarten. If they are tested mature enough then they should be able to go.

§126-28-2. Guidelines. If a child is not potty trained then they should not be able to go to public schools unless they have a disability and the school is equipped for the child.

§126-28-3. Definitions To me Pre-k is anyone under the age of 5. If 4yr. olds start public school, then before long you will want 3yr olds in kindergarten. Pre-k children should be able to play with others and learn to be social. ~~not have to~~ Worry about learning to add, subtract ect. or do science or other home work the children have to do today. They are only little once, and we need to give them time to grow up.

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

There should be more parent involvement. The parent should have to attend at least 1 class with his or her child. They need to know that the teachers are not baby sitters & they are there to help their child to learn, not just put them in front of a TV & forget about them.

§126-28-5. Attendance.

§126-28-6. Collaboration and the County Plan If 4yr olds are permitted to have to go to school, then they should have to have a teacher that has been to college for early childhood education. Regardless if they work in child care or public schools as long as they have some training or a degree.

Please Mail the Completed Comment Form to:
Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
Office of Student and Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

P.O. Box 1370
Clarksburg, WV 26302-1370
Phone: (304) 624-3325, Ext. 3361
Fax: (304) 624-3361

Harrison County
Board of Education

Fax

To: Cathy R. Jones, Ed. D. From: William Ashcraft
Fax: 558-6268 Date: 11-22-09
Phone: _____ Pages: 4
Re: _____ CC: _____

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

•Comments:

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System**COMMENT PERIOD ENDS: November 20, 2002**

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: William N. Ashcraft, Harrison County Board of EducationTitle: Assistant Superintendent Business: _____Street Address: 408 E. B. Saunders Way - P.O. Box 1370City/State/Zip: Clarksburg, WV 26302-1370

COMMENTS/SUGGESTIONS
§126-28-1. General. Applaud the intent to make consistent preschool opportunities available.
§126-28-2. Guidelines. Approve the intent to provide developmentally appropriate environments to all children.
§126-28-3. Definitions. 3.7 Minimum program availability The length of a day for both WVDE & WVDHHR should be identical. If not, then a 3½ hour day is too long for personnel purposes. Teachers may not exceed an 8 hour day. The seven hours of instruction does not allow for lunch, planning and travel time.
§126-28-4. Parent/Guardian Involvement and Family Support. 4.1.2 Documented methods of communicating with parent/guardian "which may include" We cannot be required to email parents who are not online.

COMMENTS/SUGGESTIONS**§126-28-5. Attendance.**

5.1 The final determination for the child's attendance shall be made by the principal for preschool students, just as it is for kindergarten students.

§126-28-6. Collaboration and the County Plan.**6.4. Collaboration and the County Plan**

The requirement for 50% of the classrooms to be in community settings places an undue burden on school systems. Our system is currently operating 30% of its centers in collaboration with other reliable agencies. Some of these are located within the public schools. Why could these not count toward collaborative efforts in community settings? It would seem the intent is not to encourage collaboration, but to be sure that preschool classrooms are not placed in the public school setting. Both the 50% requirement and the definition of community settings should be changed. It also behooves us to consider those groups who may choose (some for religious reasons) not to be part of the plan. These could account for a significant portion of the population of a county, making it even more difficult to achieve the 50%.

9.1 Regulation of Facilities

We have attempted to place one of our collaborations into a childcare facility that has been licensed for several years to a private childcare entity in our community. Both the licensing coordinator and the fire marshall have refused to license that same facility to us for our collaboration. Thousands of dollars have been spent by our collaboration on the physical plant: furnace, steps, paint, carpentry and electrical work. The site is still deemed unacceptable for licensure, even provisionally. Since our efforts have only improved the site, it is difficult to understand how improving it according to the directions of the licensing coordinator and fire marshall have failed to make it licensed and usable for our collaboration, but acceptable for a private daycare.

10.1 Standards for Preparing Students

Does this standard mean that any participating agency must use the adopted curriculum at all times? What would this mean for daycare centers and faith-based groups? How would this be monitored?

16.1 Program Oversight

We need a more well-defined mechanism or model for monitoring program implementation at all sites for all agencies involved in the plan. What safeguards are being built into the policy in regard to employees of these facilities who are not board of education employees?

17.2 Financing

This is another unfunded mandate. Preschool programs are expensive and excellent preschool programs are incredibly expensive.

Please Mail the Completed Comment Form to:
Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, WV 26305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System**COMMENT PERIOD ENDS: November 20, 2002****Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.**

Individual/Organization: Nikki's Child Development Center
Abbeigh Lutman

Title: Business: Childcare

Street Address: 28 Ridersville Rd

City/State/Zip: Berkeley Springs, WV 25411

COMMENTS/SUGGESTIONS §126-28-1. General.

§126-28-2. Guidelines.

I agree with the guidelines. I would like to see these guidelines used in (2525), in the future. They are good ideas.

§126-28-3. Definitions.

3.1 - I see no problem in funding, I don't want the state to take funding away from childcare.

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

I agree with Parent/Guardian involvement. All teachers and parents should have a relationship that helps the child's experience.

§126-28-5. Attendance.

I see no problem with the attendance, I don't agree with it says it's mandatory if the child is 4 yrs old. If they are ready to go, it helps the child in many ways. Some children are on a lower level, it may be difficult, could effect his future.

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

~~I agree with this also, every county needs to have ~~collaboration~~, existing child hood collabrati~~

§126-28-7. Waivers.

I agree to these waivers. 7.13 I think if theres not even half of whats expected, those children deserve the chance to learn.

§126-28-8. Personnel Standards.

Staff at Daycare who are already qualified with experience to 5 yrs, theres no need to ~~add or~~

§126-28-9. Regulation of Facilities.

I agree with these standards, every facility needs to follow these.

Policy 2525

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

I agree every child needs to be ready & willing to apply himself for a big transition like this

§126-28-11. Curriculum and Assessment.

Curriculum and assessment is very important, I agree with the evaluation.
^
Self

§126-28-12. Transition and Continuity.

11.43.E Children must learn about other cultures, let's a new & different experience for them.

§126-28-13. Inclusive Environments.

12.1.7. Parents should have a choice in what programs and when to put them in programs,

Policy 2525

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

I think these are good ideas.

§126-28-15. Transportation.

15.1 I agree with transportation.

§126-28-16. Program Oversight.

These are good ideas

§126-28-17. Financing.

17.2 I think it's good to know how much our State and County ~~to~~ the cost of this.

§126-28-18. Health and Safety.

I agree with all health & safety regulations.

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System**COMMENT PERIOD ENDS: November 20, 2002**

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Patricia A. Alker
Title: Preschool Teacher Business: Nutter Fort Elementary
Street Address: Buckhannon Pike
City/State/Zip: Clarksburg, WV 26301

COMMENTS/SUGGESTIONS**§126-28-1. General.**Agree**§126-28-2. Guidelines.**

I strongly disagree that the teachers & aides in this program need more training & education than other classroom professionals.

§126-28-3. Definitions

I do not agree with the statement that a four year old does not have to be potty-trained to be in the Preschool program. Unless there is a medical reason, these children should be potty-trained by the age of 4. A lot of time is taking away from the other children if you have this situation in your classroom. It is not the teacher's or aides' job to potty-train a child. It's the PARENTS.

I do not agree with a 3 day week plan. I taught a 3 day week plan for a year & the children loose what they learned during that period from week to week. Even 4 year olds need the consistency of a 5 day week even if its for half a day.

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

I totally agree that parents/guardian should be involved. I do not think 3 home visits are necessary at this level. I certainly hope that the regular teachers are not going to be made to do all the enormous extra paper work that the Head Start employees are required. It is not necessary & the recordings we keep on each child are certainly ample at this age level.

§126-28-5. Attendance.

At this age level, these children's attendance should not be judged the same as the older ones. These little ones are still babies growing up. Let's not rush the normal process of growing up. Let these children enjoy being children.

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

I think the 3yr old program should be self-contained. I also believe that the cut off date should be extended to at least Jan. 1st. There is a big difference in a child that has just turned 4 in May - Aug. & those that are turning five as the school year progresses.

Please Mail the Completed Comment Form to:
Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

PRUNTYTOWN ELEMENTARY SCHOOL

LITTLE RED SCHOOLHOUSE

Suzann Murphy, Principal
Rt. 2, Box 157
Gratton, West Virginia 26354

Telephone (304) 265-1893



FAX COVER SHEET
FAX #304-265-1893

TO: WV Dept. of Education

FROM: S. Murphy

DATE 11/21/02

SUBJECT: Preschool - Policy 2515

Number of pages (including cover sheet) 5

Comments: _____

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Suzann Murphy

Title: Business: Principal - Pruntytown Elem.

Street Address: Rt #2 Box 157

City/State/Zip: Grafton, WV. 26354

COMMENTS/SUGGESTIONS

***126-28-1. General.**

Clear -

***126-28-2. Guidelines.**

Clear + appropriate

***126-28-3. Definitions** There is a problem with 3.6
eligible child. A child who turns 5

In the months of July, & August especially as he given the opportunity to go to pre-K or Kindergarten. So children are not mature at age 5 for kindergarten and are being punished because they cannot get into preschool where they need to be at their level. Remember - Developmentally appropriate.

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

Clear & ok

126-28-5. Attendance.

5.1 good option

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

There is big difference between Head Start teachers & teachers who are certified in education. Research has shown Head Start is not that effective. A print rich environment is all that is heard in all research material on student learning. Head Start needs to change and read the research.

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start

Office of Instructional Services

West Virginia Department of Education

Capitol Building 6, Room 318

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us

Fax No.: (304) 558-6268

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November ²28, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Jayce Phipps
Title: Head Start Director Business: Rd. Co Community Action
Street Address: P.O. Box 3066 EBS,
City/State/Zip: Beckley, WV 25801

COMMENTS/SUGGESTIONS
§126-28-1. General.
§126-28-2. Guidelines.
§126-28-3? <u>Definitions.</u> <u>I support the requirement (research based) that classes must operate for a minimum of 3½ to a max. of 6 hours per day, with 4 hours being optimal, and that classes operate a min. of 4 days per week.</u>

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

This section needs strengthened to include: requiring county plans to address how they will work with families in the areas of Literacy, Parenting, Employment, Wellness in order to strengthen parents' skills as children transition into kindergarten.

§126-28-5. Attendance.

* §126-28-6. Collaboration and the County Plan. *Recruitment/enrollment as a collaborative effort to assure minimal duplication of paperwork for families need to be addressed in the County Plan. A common/compatible intake form to enroll children in various options in each county is ~~similar~~ essential.*

§126-28-7. Waivers.

§126-28-8. Personnel Standards.

I strongly support Sections 8.2 and 8.3 for qualifications and the full-time permit provisions to assure qualifying certification/endorsement of personnel.

§126-28-9. Regulation of Facilities.

Strongly support requiring programs serving four-year-old children in pre-K be required to meet the WDHHR Child Care licensing regulations, and also support OEPA of the State DOE in enforcement of corrective action plans identified through DHHR monitoring process.

* 6.4 *In order to maximize existing funds, I support that a minimum of 50% of the four-year-old classrooms be contracted to community programs meeting the standards to provide the classroom space, qualified staff and financial resources to meet the goal.*

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

§126-28-11. Curriculum and Assessment.

§126-28-12. Transition and Continuity.

§126-28-13. Inclusive Environments. *is essential.*

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

§126-28-15. Transportation *is essential* to universal access of pre-K services. It is *strongly* recommended that transportation be a *required* service in order to assure that transportation is available in rural areas and areas with extensive low-income population.

§126-28-16. Program Oversight.

§126-28-17. Financing.

§126-28-18. Health and Safety.

§126-28-19. Program Evaluation.

Constructive/objective monitoring is a necessary component of all county plans. The Head Start Program Performance Standards should be utilized in development of the monitoring process.

Please Mail the Completed Comment Form to:

with strong direction re: essential parts,

Cathy R. Jones, Ed.D., Coordinator, Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us

Fax No.: (304) 558-6268

possibly a format similar to the county plan.

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Dr. Paul E. Barcus, Jr. / Wetzel County Schools

Title: Superintendent Business:

Street Address: 333 Foundry Street

City/State/Zip: New Martinsville, WV 26155

COMMENTS/SUGGESTIONS
§126-28-1. General. Three year olds are only identified in the General Section and Guidelines.
§126-28-2. Guidelines. 2.1.1 and 2.1.5 seem to conflict. Is it four year olds or three year olds? 2.1.7 This should read "employ highly qualified staff as defined by NCLB"
§126-28-3. Definitions. 3,7 Should read "a minimum of ten and a half hours per week during consecutive days during the school year." This will allow counties the flexibility of "scheduling" while meeting the intent of the law.

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

§126-28-5. Attendance.

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

6.1 Delay in the passage of this policy, October-December, 2004, would allow collaborations to have more time for planning for a quality program.

6.3 County plans should be submitted for "full implementation" or until 2013.

*6.4 A mandated percentage of contracted services will ensure "failure" and negates the "spirit" of collaboration on which successful programs are based.

§126-28-7. Waivers.

§126-28-8. Personnel Standards.

8.1 Requiring certified staff is commendable.

§126-28-9. Regulation of Facilities.

9.1 WV Department of Education has its own facility requirements. Programs housed in school facilities should only have to meet those requirements. Programs housed outside of schools should be regulated under the DHHR Child Care licensing staff.

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

§126-28-11. Curriculum and Assessment.

- 11.6 Should be eliminated. This does not belong in policy.
Identified developmentally appropriate practices will be used by certified teachers.

§126-28-12. Transition and Continuity.

- 12.1 Attention to transition is critical. This statement should read:
"Each program participating in the county plan must have a written and implemented plan for transitioning children into kindergarten."
The statement should end there.

§126-28-13. Inclusive Environments.

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

- 14.1 The staff development requirement of 18 hours annually is reasonable, however, effective staff development is more personalized and based on needs. Please do not mandate the topics of annual staff development!
- 14.2 Please change this to read: "...professional development opportunities MAY follow the WV STARS process." There may be more effective ways to achieve desired results.
- 14.3 This policy is not written for certified public school teachers. Please consider allowing the public school sites to follow the existing rules for maintaining the teaching license.

§126-28-16. Program Oversight.

Needs to be clearer as to whose responsibility it will be for oversight.. Two sets of rules!

§126-28-17. Financing.

§126-28-18. Health and Safety.

§126-28-19. Program Evaluation.

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D., Coordinator, Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us

Fax No.: (304) 558-6268

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Barbara Stout/Wetzel County Schools

Title: Director Adolesc. Ed. Business:

Street Address: 333 Foundry Street

City/State/Zip: New Martinsville, WV 26155

COMMENTS/SUGGESTIONS
§126-28-1. General. Three year olds are only identified in the General Section & Guidelines.
§126-28-2. Guidelines. 2.1.1 and 2.1.5 seem to conflict. Is it 4 year olds or 3 year olds? 2.1.7 should read "employ highly qualfied staff as defined by NCLB."
§126-28-3. Definitions 3.7 should read "a minimum of 10½ hours per week during consecutive days during the school year." This will allow counties the flexibility of "scheduling" while meeting the intent of the law.

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

§126-28-5. Attendance.

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

6.1 Delay in the passage of this policy, October-December, 2004, would allow collaborations to have more time for planning for a quality program.

6.3 County plans should be submitted for "full implementation" or until 2013.

* 6.4 A mandated percentage of contracted services will ensure "failure" and negates the "spirit" of collaboration on which successful programs are based.

§126-28-7. Waivers.

§126-28-8. Personnel Standards.

8.1 Requiring certified staff is commendable.

§126-28-9. Regulation of Facilities.

9.1 WV Dept. of Education has its own facility requirements. Programs housed in school facilities should only have to meet those requirements. Programs housed outside of schools should be regulated under the DHHR Child Care licensing staff.

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

§126-28-11. Curriculum and Assessment.

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Identified developmentally appropriate practices will be used by
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§126-28-18. Health and Safety.

§126-28-19. Program Evaluation.

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West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Candis D. Clark / Wetzel County Schools

Title: Elementary Coordinator Business:

Street Address: 333 Foundry Street

City/State/Zip: New Martinsville, WV 26155

COMMENTS/SUGGESTIONS
§126-28-1. General. Three year olds are only identified in the General Section & Guidelines.
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§126-28-18. Health and Safety.

§126-28-19. Program Evaluation.

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D., Coordinator, Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System**COMMENT PERIOD ENDS: November 20, 2002**

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Nikki's Child Development Center
Keith Seal

Title: Business: Teacher asst 4's & 5's
~~Korek~~

Street Address: 28 Ridersville Rd

City/State/Zip: Berkeley Springs WV 25411

COMMENTS/SUGGESTIONS §126-28-1. General.

§126-28-2. Guidelines. I feel that these guidelines are set forth to be sure that the children who are involved in this program receive the highest level of learning possible & totally agree w/ these guidelines.

§126-28-3. Definitions. I feel these definitions support & lay out all aspects of the W pre-K program. I am unsure whether or not I agree w/ the limits set on the min. amount of days a child must attend.

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

Parent/Guardian involvement is very important that is number one priority & believe support must also come from other members of the family as well however parental support is most important to me.

§126-28-5. Attendance.

Enrollment is a good thing. However I feel that if parents are repeatedly ~~abs~~ bringing their child late or he/she is absent neg. to give that spot to someone more deserving.

X

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

I feel that all offices need to be at some type of agreement on this will never work. I also agree w/ the fact that 50% of decisions participation must be w/ in the community. Once again stressing community involvement.

§126-28-7. Waivers.

My feelings regarding are very unsure. I really don't understand or get the who gist of this.

§126-28-8. Personnel Standards.

Teacher eligibility is most important also! All teachers must have that smart capability not just a degree. There are plenty of teachers in the school who have no degree but are more than capable of giving our future what they need & deserve.

§126-28-9. Regulation of Facilities.

I feel that if a facility is participating they must meet the same health requirements as any other public/private school.

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

Preparation is important however I feel there is too much stress on cramming all this information into a child's brain this early. These are their years to learn through play. NOT sitting in a desk.

§126-28-11. Curriculum and Assessment.

Having some type of curriculum is imp. This allows parents/guardians to see what their child is learning.

I feel that a curriculum also helps cover all aspects of a certain subject. Rotating materials is also very imp. This keeps the children interested.

§126-28-12. Transition and Continuity.

I feel that this is very important. Kindergarten teachers need to know something about the children prior to the child coming to kindergarten. This lets the teacher become familiar w/ the child's strengths & weaknesses.

§126-28-13. Inclusive Environments.

13.1 - I totally agree.

13.2 - I feel that ~~to~~ it is imp. for children to be together but there are some special requirements children w/ disabilities do need.

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

*I feel ~
The staff must have some type of childhood experience for a prolonged amount of time not necessarily a degree. Continuing training & evaluations ~~to~~ I feel is sufficient.*

§126-28-15. Transportation.

I feel that transportation needs are very indirect. If ~~the~~ the State is starting a program for these children these officials in the State office need to be sure they have some type of transportation for these children besides being mingled w/ school age children.

§126-28-16. Program Oversight.

This goes back to my suggestion on 126-28-3. Everyone needs to agree and come together before this will work in my opinion.

§126-28-17. Financing.

The programs in my opinion need to be funded just as well as all other public school facilities.

§126-28-18. Health and Safety.

Totally agree!

Cathy Jones

From: Nancy Dusci [ndusci@npheadstart.org]
Sent: Wednesday, November 13, 2002 2:52 PM
To: ctrjones@access.k12.wv.us
Subject: Policy 2525/Public Comments

I Nancy Dusci support these policies because I strongly believe that to implement collaborative classrooms these minimal standards must be met.

Page 3

✓ 3.7 – I believe that each 4 year old child must be provided a minimum of 3 consecutive days and for no less than three and one half hours each day but no more than 4 hours per day.

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

Page 3

I think each county should be required to have a plan to involve parents in areas of Parenting, and Literacy.

126-28-6 Collaboration and County Plan.

Page 4

6.4- I believe that 50% of the four year old classrooms be contracted to community programs. I also believe that the county can have access to those programs to support them throughout the community.

126-28-8 Personnel Standards

Page 6

8.1 I also agree that the teaching staff must hold a qualifying certification/endorsement.

8.2 I agree with a full time permit must be issued and valid for one school year and shall expire on June 30.

8.3 I believe the aides and assistants must have a plan of action for their education needs.

126-28-11 Curriculum Assessment

Page 7 Transition to Kindergarten must be incorporated as one of the components

126-28-9 Regulation of Facilities and 126-20-18 Health and Safety.

Page 7-9. I support all state licensing regulations or the Head Start Performance Standards at a minimum for requirements for all programs to meet.

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System**COMMENT PERIOD ENDS: November 20, 2002**

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization:**Title: Business:**

RESA VIII Head Start - Most of the staff did not get the form I'm using. Please include their comments also

Street Address:

50 Myers St
Berkeley Springs, WV 25411

City/State/Zip:

COMMENTS/SUGGESTIONS §126-28-1. General.

Very appropriate especially 2.1.6

2.1.1.1 Teacher child ratio of 1-10 which is current guidelines is too large

Voluntary Participation - good - unfortunately some will not be participating due to lack of transportation or a county who gets a waiver

§126-28-2. Guidelines.

§126-28-3. Definitions.

3.7 - minimum of 3 1/2 hours - 3 consecutive days -
Needs to be changed to accommodate other alternatives such as few hours - more home visits as an option so Head Start or the counties can design programs that best meet children and family needs

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

Very important aspect - Needs to include home visit not just a conference

§126-28-5. Attendance.**§126-28-6. Collaboration and the County Plan.**

6.4 flexibility needs to be used 50% in one area of the county with rural centers for few daycares in one area more than 50% maybe be eligible for Head Start

§126-28-7. Waivers.

If it is a growing county where lack of space may be a problem funds for this building program especially start up funds needs to be made available otherwise the counties will

8.2.3. persons with AA degrees get 5 years to become certified
Will pay be at a teachers rate or AA rate?

§126-28-8. Personnel Standards.

8.1 A must. Qualified teachers with a preschool background are essential.

This needs to include degrees in pre-school special education because they are trained in typical and atypical development. If you want inclusion you need teachers with disabilities skills.

§126-28-9. Regulation of Facilities.

Good to have all classes meet day care regulations. Currently the school systems does not have to comply which I have never understood.

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

Good to standardize the objectives

§126-28-11. Curriculum and Assessment.

Who chooses the curriculum - each classroom or the county?

Essential components are listed. Keep ALL of these

11.5.1 add sand and water play.

Excellent NO desks - NO work sheets

§126-28-12. Transition and Continuity.

12.1.1 I like the idea of kindergarten field trip

§126-28-13. Inclusive Environments.

13.2 This may not be totally possible due how families are located in areas.

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

§126-28-15. Transportation.

Appropriate transportation for preschool according to state Transp/
Tots should be available

§126-28-16. Program Oversight.

§126-28-17. Financing.

Start up funds need to be available

§126-28-18. Health and Safety.

Screenings needs to include dental and well child check-ups

§126-28-19. Program Evaluation.

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start

Office of Instructional Services

West Virginia Department of Education

Capitol Building 6, Room 318

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us

Fax No.: (304) 558-6268

West Virginia Department of Education

1900 Kanawha Boulevard East

Charleston, WV 25305

([Phone List by Topics](#)) ([Staff Phone and Email by Name](#)) ([School Directory](#))

For suggestions, questions, problems contact the **webmaster**
Please read our **disclaimers**

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Susanna Villers / Wetzel Co. Schools

Title: Attendance Director Business: _____

Street Address: 333 Foundry St.

City/State/Zip: New Martinsville, WV 26155 -

COMMENTS/SUGGESTIONS
§126-28-1. General.
§126-28-2. Guidelines. Language is not consistent w/ regard to three and four year olds. (2.1.1 / 2.1.5)
§126-28-3. Definitions. 3.7 - needs more flexibility for families. Suggest "10.5 hrs per week"

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

Glad to see parent involvement

§126-28-5. Attendance.

- 6.1 Initial due date, June 27, 2003, is too soon to provide adequate planning.
- 6.4 Collaboration based upon individual student needs is appropriate. Mandate of 5072 indicates other motives which may not be in the best interest of the child

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

§126-28-7. Waivers.

§126-28-8. Personnel Standards.

8.1 Good!

§126-28-9. Regulation of Facilities.

- 9.1 Public schools already have facility regulations and monitoring. Programs outside of public schools are the only ones that need monitored by other agencies

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

Good

§126-28-11. Curriculum and Assessment.

11.6 Delete. Professional teachers should be permitted to discern appropriate methods and practices.

§126-28-12. Transition and Continuity.

12.1 Important concept, but should be left up to individual counties how it will be handled.

§126-28-13. Inclusive Environments.

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

14.1 Counties should determine professional development based upon needs of the program (staff & children).
 14.2 Should not be dictated, but decisions of professional development left up to the county.
 14.3 WV already outlines teacher/aide requirements, ~~as training~~ ^{no training} interferes with locally identified needs.

§126-28-15. Transportation.

§126-28-16. Program Oversight.

§126-28-17. Financing.

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Please Mail the Completed Comment Form to:

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Office of Instructional Services
West Virginia Department of Education
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1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

126CSR28

Title: Judy R. Kachelmeier
Director Business: First Child Care Resource & Referral

Street Address: 605 9th St. Suite 203

City/State/Zip: Huntington, WV 25701

COMMENTS/SUGGESTIONS	
§126-28-1. General.	<i>Fine</i>
§126-28-2. Guidelines.	<i>Good. I particularly like the statements "readiness programs", "developmentally appropriate curriculum", "building blocks for literacy", "effective practice based on scientific research", "employ staff with strong professional education preparation in child development and early childhood education", "teacher/child ratios and class size according to recommended guidelines"</i>
§126-28-3. Definitions	<i>Fine</i>
§126-28-4. Parent/Guardian Involvement and Family Support.	<i>I like the wording that includes parents/guardians in the decision making about the child's education. Communication with parents is critical!</i>

§126-28-5. Attendance.

Worked well - includes ways to work with families to see that children attend, and to be able to disenroll a child if it becomes necessary.
Be sure attendance/absences reflect the fact that 4yr. olds do get sick a lot.

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

Collaboration is very important. There are some excellent 4-year-old programs already existing which will be helpful to the schools. I like the collaboration between DHR and the BOE. I think that together a really good plan can be put in place.

Good grouping of collaborative planning teams.

Please Mail the Completed Comment Form to:
Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

Personnel Standards - It is very important that staff for this age group be certified/endorsed in some kind of early childhood education. This age child will have different needs from a typical school-age child.

Regulation of Facilities - can a county school be "licensed" if they want to? Consider - can they become an accredited facility if they wanted to?
Curriculum and Assessment - very good

Cathy Jones

From: Bunce or Vincents [bandvs@stargate.net]

Sent: Monday, November 11, 2002 7:03 PM

To: ctrjones@access.k12.wv.us

Subject: comments on policy 2525

I am a preschool special needs teacher for Raleigh County. I teach at Shady Spring Elementary. My home address is: Linda Bunce, PO Box 608, Cool Ridge, WV, 25825. I would like to comment on **section 126-28-18, Health and Safety, 18.7**: I have been pushing for inclusion in our county since I began teaching here, nine years ago. But inclusion has to have the staff to support the success of the child. Please consider making the ratio 3 adults to 20 children, if the special needs caseload is heavy in the class. Or base ratio on some kind of system of weighting the intensity of needs of the children being served. We often have children with very severe health or behavioral needs, sometimes to the point that one adult must be in close supervision of that child at all times. It will not be safe or healthy to just add 8-10 typical children to that mix, with the same number of adults, no matter how well trained the staff. Our ratio is currently 2 adults to 8 children. For some of these more severely involved kids, (with autism, mental impairment, orthopedic impairment, for example), once they enter kindergarten and receive a special ed. label, the ratio will actually go down to 2 adults per 4-6 children. I am particularly concerned that young children with autism will not be having their needs met. They need special structure and intensive behavioral training, in addition to inclusive experience.

Re 18.6, the proposed 35 square feet per child-- Dream on! This will rarely be available in the school system. You may want to add something about four walls, especially if the ratio of children to adults is going to remain so high. Some of the current preschool rooms are in open classrooms, making supervision that much more challenging, when children are developmentally delayed and take time to train to stay within an area.

Cathy Jones

From: Gym1stars@aol.com
Sent: Tuesday, November 05, 2002 10:33 AM
To: ctrjones@access.k12.wv.us
Subject: Policy 2525

Comments/Suggestions regarding revised Policy 2525

Tim
Fairmont, WV

126-28-15. Transportation

It would be a shame to not to make transportation services mandatory. As a tax paying citizen as well as a child advocate this service is vital for families. To truly service **all** the children this service must be included. It is not fair to the families that do not qualify for Head Start nor has a child that qualifies for preschool special needs no transportation!

126-28-11. Curriculum and Assessment

Vary little is said about playground. Many playgrounds are funded by the PTO's. Most playgrounds are not designed to meet the preschool children needs---who will be left to pick up the cost.

Cathy Jones

From: KDTTRIO@aol.com
Sent: Wednesday, November 06, 2002 9:06 PM
To: ctrjones@access.k12.wv.us
Subject: policy 2525

**Parent/Guardian Involvement and Family Support
126-28-4**

School boards collaborating with Head Start programs must understand and adhere to all the regulations dealing with Parent Involvement. Parents should be and encourage to volunteer in their child's classroom. For example, many schools during party days only allow two parents to participate. How is that creating true parent involvement.

Policy Council should also be apart of the process of hiring teachers.

**Transportation
126-28-15**

Transportation should be made mandatory if you want to reach all the children in each community.

**Staff Development
126-28-14**

A grandfathering clause should be given to staff that have a two year degree in child development and three years of classroom experience. These individuals should be allow to teach for the BOE.



West Virginia University

College of Agriculture, Forestry and Consumer Sciences

Cathy Jones, Ed.D. Coordinator
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305

Nov. 4, 2002

Dear Cathy,

I have reviewed the proposed rule for West Virginia's Universal Access to Pre-Kindergarten System (2525). I actually think it looks good but have a few comments that I believe the counties are confused about.

Page 2 2.1.7 As a professor, I am glad that you have included child development in the list with early childhood.

Page 3 3.7 The 3 consecutive days is good but need to specify the number of allowable days---or at least a range. Some counties think that you must have 180 days for the 4 year old programs. With requiring 3 consecutive days, it implies that 180 days are not necessary—which is good but needs some clarification. I suggest subtracting 2 days a week times the number of weeks of school year. The children are only 4 and it does not seem appropriate to require a full week or 180 days.

Page 7 under curriculum-11.1 It is good to have a list of approved curriculums to use but need to have some flexibility—for example, the WVU Nursery School uses several sources and curriculums (not just one) and enhances these with our own research in curriculum. Counties should encourage variety in the programs and not say all 4 year old programs must use the same.

Page 7 11.3 Assessments need to include a variety of performance based such as Work Sampling System etc.

Page 11 11.6 great paragraph

Division of Family and Consumer Sciences

702 Allen Hall
PO Box 6124
Morgantown, WV 26506-6124

Phone: 304-293-3402
Fax: 304-293-2750

Equal Opportunity/Affirmative Action Institution

Sincerely,

A handwritten signature in cursive script, reading "Bobbie Warash". The signature is fluid and elegant, with a large initial "B" and a long, sweeping underline.

Bobbie Gibson Warash, Ed.D
Professor, Child Development
Director, WVU Child Development
Laboratory

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization:

PIECES Advisory Council Standards and Regulations Committee

Reporting: Beth Hall

Title: Business:

WVDHHR, Office of Early Care and Education

Street Address:

Room 691

350 Capitol Street

City/State/Zip:

Charleston, WV 25301

COMMENTS/SUGGESTIONS

§126-28-1. General.

No comment

§126-28-2. Guidelines.

No comment

§126-28-3. Definitions.

3.6 Does eligible child need to include WV resident or is this covered by statute?

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

No comment.

§126-28-5. Attendance.

5.1 The committee supports the voluntary nature of WV Pre-K and encourages the Department to keep WV Pre-K voluntary.

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

6.4 The committee supports this policy and recommends that the requirement to keep 50% of the classrooms in the community setting not be changed to a smaller percentage.

§126-28-7. Waivers.

No comment.

§126-28-8. Personnel Standards.

No comment.

§126-28-9. Regulation of Facilities.

No comment.

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

No comment.

§126-28-11. Curriculum and Assessment.

No comment.

§126-28-12. Transition and Continuity.

12.1.7 The committee supports minimizing the number of settings and recommends: that the county plans must describe the enrollment process for families; that the enrollment site be accessible to working parents; that families may use a classroom out of county if the county has the opening using existing transfer policies.

§126-28-13. Inclusive Environments.

The committee supports the inclusiveness of this policy.

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

No comment.

§126-28-15. Transportation.

No comment.

§126-28-16. Program Oversight.

No comment.

§126-28-17. Financing.

17.2 Replace the word "support" with "directly benefit".

§126-28-18. Health and Safety.

The committee recommends that policy be added which requires: 1) Supervision of children during drop-off and pick-up time must be arranged; 2) Supervision of children during outside play/recreation must, at a minimum, maintain the classroom ratio.

§126-28-19. Program Evaluation.

No comment.

Please Mail the Completed Comment Form to:

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West Virginia Department of Education
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(Phone List by Topics) (Staff Phone and Email by Name) (School Directory)

Comments on Policy 2525: West Virginia's Universal Access to Pre-Kindergarten System

Ann Nutt, Director of Early Care and Education Quality Initiatives
WV Department of Health and Human Resources

Comments/ Suggestions

§126-28-3 Definitions

3.6 *Eligible Child*- Support the inclusion of "toilet trained" in the definition. It is important that all four year olds be included.

I wonder if we need to consider defining a "curriculum enhancement" and a curriculum.

§126-28-6 Collaboration and the County Plan

6.4

- The inclusion of a % of classrooms to be community based is extremely important to building a quality system of early care and education in our communities.
- I would like to see clarifying language around "cannot meet the mandates of this policy" that would give clarity to the need to pool human and financial resources to help partners meet the mandate of the policy. IE- that plans that exclude community partners would show efforts made to support partners, such as placing certified teachers etc in a community program so that they could meet the expectations. This is important in order to meet other parts of the policy related to continuity and minimizing the no. of changes for children in one day.

§126-28-8 Personnel Standards

- I support the specified certifications that include specific early childhood and child development information.
- I support the opportunity for individuals with an AA in child development/ early childhood or occupational development with and emphasis on child development/early childhood to have full time permit. This is essential for building capacity and including community programs.

§126-28-9 Regulations of Facilities

9.1

- Change code to the Department of Health and Human Resources rule, "Day Care Center Licensing," 78CSR1 (could add effective June 1, 1982 ... then what you have now about

any that will replace.

- I strongly support the expectation that all programs serving four year olds should meet the same health and safety standards. Regardless of setting, children need safe and healthy environments.
- It may be useful to consider whether it is necessary to clarify whether a pre-k classroom only in a public school setting, or all areas used by pre-k children or the entire building must meet the standards.(playgrounds, classrooms, pre-k children/staff only)

§126-28-10 Standards for Preparing Students

- 10.1 - Consider the option to strengthen the policy for future implementation by adding language that indicates that the CSO are based on a developmental continuum, and are to be used to reflect children's progression along the continuum vs. becoming a checklist for "passage" to Kindergarten or other inappropriate practice might be helpful. Perhaps similar to 2.1.6 in guidelines. It feels like there is a real danger of CSO becoming a check list, rather than a guide.

§126-28-12 Transition and Continuity

12.1.7 I strongly support the need to plan for continuity of care, minimizing the number of settings children are in during the day. It is essential for children's optimal development that they have consistent staff and routines throughout their day.

§126-28-13 Inclusive Environments

13.1 & 13.2 I strongly support the concept of fully inclusive classrooms as much as possible.

§126-28-19 Program Evaluation

19.1 I support the use of the ECERS to evaluate classroom environment

Cathy Jones

From: Donna A. Burge-Tetrick [dtetrick@access.k12.wv.us]

Sent: Friday, November 15, 2002 12:35 PM

To: ctrjones@access.k12.wv.us

Subject: Policy on 4 year olds

I would like to respond to the policy on 4 year olds by stating that I am not in favor of making Headstart and Daycare people certified teachers.

Calhoun County strives to make its educational system as good as possible and already has 4 year olds attending school 2 full days a week. If the policy is implemented for 3 half days Calhoun Students would be loosing valuable instructional time.

Transportation cost is another issue for this county. Our county is very sparsely populated and 3 additional bus runs would be a financial burden on the county.

ARNOLDSBURG SCHOOL
PO BOX 159
ARNOLDSBURG WV 25234
Phone: 304-655-8616
Fax: 304-655-8618

Arnoldsburg Elem

Fax

To:*Cathy R Jones***From:** *Carolyn Nester*
~~DONNA BURGE-TETRICK, PRINCIPAL~~~~CONNIE BADGETT, SECRETARY~~**Fax:** *304-558-6268***Date:** *11-15-02***Phone:****Pages:** *2***Re:****CC:**

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

Comments:

We are a small community. Pre-School through 12th. grade students; ride together on the same buses. They all attend school a whole day. Our county doesn't have the funds to run buses at noon also. We don't have the extra room to accommodate these children. We also have certified teachers waiting for jobs in Calhoun County. It wouldn't be fair to give people teaching certificates, who haven't even been to college. We Paraprofessionals are more qualified to teach and have more experience than most people who work to Head Start programs.

Carolyn Nester
Paraprofessional
Arnoldsburg School

Dave

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**TITLE 126
PROCEDURAL RULE
BOARD OF EDUCATION**

SERIES 28

West Virginia's Universal Access to Pre-kindergarten 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 West Virginia's Pre-k System (WV Pre-k).

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

1.3. Filing Date. - -

1.4. Effective Date. - -

1.5. Repeal of former rule. - - None. This is a new rule.

§126-28-2. Guidelines.

2.1. WV Pre-k classrooms shall:

2.1.1. be readiness programs that are designed to meet the needs of eligible children and three year olds mandated under federal law.

2.1.2. utilize developmentally appropriate curriculum based on scientific research about how children learn.

2.1.3. provide the building blocks for literacy.

2.1.4. view children within the context of their family.

2.1.5. use a learning approach that reflects most effective practice based on scientific research about how four-year-olds learn.

2.1.6. incorporate content standards and objectives, curriculum, and assessment as tools for measuring the child's progress on the continuum of development and individualizing educational opportunities.

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.

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.

Below guidelines would be better

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. *Approved funding sources* means any funds used directly to support WV Pre-k classrooms for eligible children including school aid formula, Head Start funds, Even Start funds, Temporary Assistance to Needy Families, Child Care Development Funds, funds under the Elementary and Secondary Education Act, funds provided by the School Building Authority, and any other private or public funds.

3.2. *Approved WV Pre-k participating programs* shall mean providers of early care and education services including, but not limited to, childcare, private preschool, Head Start, county school systems, 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 a contracted agreement or direct administration of the county school system.

3.3. *Contracted program* shall mean any program that qualifies as an approved WV Pre-k participating program by meeting all of the requirements of this policy and contracts with the county school system under the county collaborative plan to operate a classroom specific to this policy.

3.4. *County collaborative plan* means the plan each county school board is required to submit detailing 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.

3.5. *Developmentally appropriate* means early childhood programming, curricula, and activities that address the stages of each child's cognitive, physical, social/emotional, and cultural development.

3.6. *Eligible child* shall mean any child, regardless of ability or whether he/she is toilet trained, who is four by September 1 of the year he/she is to enroll or whose enrollment is mandated under state and/or federal law. 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.

3.7. *Minimum program availability* means offering each preschool class a minimum of three consecutive days/week for at least three and one half hours per day during the school year calendar. ^Δ

Head start Combo Program is 4 days a week 2 hours daily

3.8. *West Virginia's Pre-k* means kindergarten readiness programs including, but not limited to, developmental kindergartens, four-year-old kindergarten, and other programs provided by approved WV Pre-k participating programs for eligible children in West Virginia.

§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 parent/guardian conferences annually.

4.1.2. documented methods of communicating with parent/guardian including 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 126CSR16, West Virginia Board of Education Policy 2419 - Regulations for the Education of Exceptional Students, for preschool children with

disabilities which are integrated into the program and provided in accordance with the needs specified in the child's Individualized Education Program.

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

§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 West Virginia 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.

Keep it Voluntary

5.2. Each county must include in their plan a provision for working with families whose children are chronically absent and/or tardy.

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

6.1. Each county board of education must submit a county plan (an original and six copies) to the Secretary of the West Virginia Department of Health and Human Resources. The initial plan is due June 27, 2003. All county plans are to be prepared in accordance with the County Plan for Services to Eligible Children document (attached).

6.2. Once the county plans are approved by the Secretary of the West Virginia Department of Health and Human Resources, the plans will be forwarded by the Secretary's office to the West Virginia Board of Education 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.

6.3. Changes, updates and amendments to the county plans are to be submitted to the West Virginia Department of Health and Human Resources and the West Virginia Department of Education by 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.

6.4. In order to support counties in the effort to maximize existing resources and collaborate with other providers of early childhood education, no less than 50% of the classrooms for eligible children must be provided through contracts 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 or cannot meet the mandates of this policy. 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 community settings. This ratio of community to public school providers can only be decreased with the

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written permission of both the West Virginia Board of Education and the Secretary of the West Virginia Department of Health and Human Resources. 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.

6.5. The county collaborative planning team must include at a minimum a representative 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.

6.6. Other recommended members of the county collaborative planning team may include a representative from the West Virginia Birth to Three program, 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.

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

6.8. Any member of the county collaboration planning team that will provide services to eligible children in that county must follow all rules and regulations as outlined in the state policy.

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

6.10. County plans will include a list of all programs invited to participate in the planning process regardless of whether the program chose to participate.

§126-28-7. Waivers.

7.1. The West Virginia Board of Education may grant a waiver from full implementation of WV Pre-k in a county if the state board 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 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 the twenty-fifth day of March for the following school year.

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

§126-28-8. Personnel Standards.

8.1. Teachers must hold a qualifying certification/endorsement for teachers, specifically, early education, Prek-k endorsement, or birth to five. *Good - need special age for this age renewable for 5 yrs*

8.2. A full time permit shall be issued and valid for one school year and shall expire on the thirtieth day of June. 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 126CSR136, West Virginia Board of Education Policy 5202 - Minimum Requirements for the Licensure of Professional/Paraprofessional Personnel and Advanced Salary Classification, Section 15. Full time permits will be issued for:

8.2.1. persons with degrees in preschool special needs, elementary education, child and family studies with an emphasis on early childhood education, or child development, or

8.2.2. persons with a Board of Regents degree with a specialization in early childhood/child development, or

8.2.3. persons with an AA in child development/early childhood or occupational development with an emphasis on child development/early childhood and one year of early education teaching experience. *IT will be very hard to keep aides employed that have an AA. with and aides salary*

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 West Virginia State Registry and Training System (WV STARS) 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 0-1 years of experience and possess the ability to understand and practice the core competencies with direction and instruction or through sponsorship of a professional organization or qualified

Why? They already meet requirements through State dept. of Edu.

mentor (attached). Aides and assistants must have an individualized staff development plan for specifying his/her planned progression on the career pathway toward level V.

§126-28-9. Regulation of Facilities.

9.1. All approved participating WV Pre-k programs, see definitions, that are included in the county collaborative plan must meet the requirements as set forth in the West Virginia Division of Health Legislative Rules Child Care Centers 64CSR21 or any rule promulgated to replace and/or update 64CSR21. Public schools or other programs who are exempt under West Virginia Division of Health Legislative Rules Child Care Centers 64CSR21 or its replacement must meet the requirements set forth in that rule. In the case of public schools, West Virginia Department of Health and Human Resources Child Care Licensing staff will conduct monitoring visits and any recommendations for action will be made to the Office of Education Performance Audits.

Good

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

10.1. Programs participating in the county's collaborative plan must adhere to the West Virginia Department of Education content standards and objectives for eligible children's programs which are aligned with the Head Start outcomes framework and kindergarten content standards and objectives. The content standards and objectives for programs serving eligible children are written to reflect a level of performance that supports successful transition into kindergarten.

§126-28-11. Curriculum and Assessment.

11.1. Only curricula and curriculum enhancements that are included on the list of accepted curricula and curriculum enhancements may be used by programs participating in the county plan. *Find a curriculum enhancement that does not take the teachers/aides time away from the children example COR*

11.2. Curricula, curriculum enhancements and assessment processes will be approved following the process established by the West Virginia Department of Education, including, preschool special education, for adoption of instructional materials. *child observation Record*

11.3. Curriculum and assessment, along with the content standards and objectives, will be parts of an inter-related system that measures the child's progress on a continuum of development and are utilized to individualize the children's educational opportunities.

11.4. Curricula 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:

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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.

Don't forget this one

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. *Assessments should not take teachers focus away from children*

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:

a. meeting the content standards and objectives for eligible children as prescribed by the West Virginia Board of Education.

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).

Do not limit this

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: *Other support staff can help w/ assessment*

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, 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.

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:

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smooth transitions.

- a. promoting consistency in schedules and routines and facilitating

- 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 compliment to, not substitute for, effective teaching or good curriculum. *Do not put technology above hands on interaction*

11.4.12. include an assessment process 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 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
- h. art,
- i. music.

Sand/water play

11.6. Classroom design and program implementation for eligible children must exclude the use of desks, mimeographed 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.

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12.1. Each program participating in the county plan must have a written and implemented plan for transitioning children into kindergarten. At a minimum the plan will include:

12.1.1. an opportunity for the child to visit the kindergarten classroom.

12.1.2. written information to parent/guardian about kindergarten registration and what to expect in kindergarten.

12.1.3. an opportunity for teachers in the 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, on 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. children with Individualized Education Programs will utilize this transition process as guidelines for the transition of children established in 3.1.1 of this policy.

12.1.6. transition planning which follows the *West Virginia Childhood Transition Checklist* (attached).

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.

§126-28-13. Inclusive Environments.

13.1. County plans will outline the county's process for providing inclusive early childhood classrooms with appropriate supports for children with identified special education needs.

13.2. County plans will not develop classrooms that segregate children on the basis of socioeconomic level, ability, and/or funding streams. 

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

14.1. Each county plan will include a plan for providing a minimum of 18 hours annually for staff development related to high quality programming for eligible children based on a

professional development needs assessment and including a minimum of six hours of education on inclusive environments.

14.2. Professional development opportunities will follow the West Virginia State Training and Registry System (S.T.A.R.S.) training process (attached).

14.3. Every early education teacher and aide must complete a total of 45 hours of training based upon the curriculum/assessment standards over a 24 month period and provided by the employer or made accessible through the county collaborative plan for professional development. These 45 hours of training will satisfy the 18 hours annual training requirement for the year in which the training is received and the two subsequent years.

§126-28-15. Transportation.

15.1. For programs participating in the county collaborative plan, transportation is considered a support, not a mandated service. *Good luck getting #s of children*

15.2. Participating programs should coordinate transportation systems to support families whose children would not otherwise be able to participate.

15.3. All participating programs must, at a minimum, follow the requirements of their primary funding source or the West Virginia TransporTots document whichever is more stringent.

§126-28-16. Program Oversight.

16.1. Local program oversight, 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.

16.2. The West Virginia Board of Education or its designee and the Secretary of the West Virginia Department of Health and Human Resources or his/her designee will maintain state oversight.

16.3. On or before the second day of January, 2004, the Secretary of the West Virginia Department of Health and Human Resources and the West Virginia State Superintendent of Schools will submit a report to the Legislative Oversight Commission on Educational Accountability and the joint committee on government and finance which addresses, at a minimum:

16.3.1. a summary of the approved county plans for providing the early childhood education programs under this policy.

16.3.2. an analysis of the total cost to the state and counties of implementing the plans.

16.3.3. a separate analysis of the impact of plans on counties with increased enrollment.

16.3.4. an analysis of the affect of the programs on the maximization of the use of federal funds for early childhood programs.

16.4 On or before the first day of December, 2004, and each year thereafter, the West Virginia State Board of Education shall report to the Legislative Oversight Commission on Educational Accountability.

§126-28-17. Financing.

17.1. Neither the West Virginia Board of Education nor the West Virginia Department of Education may provide any funds to any county for the purpose of implementing this policy unless the county has an approved plan as outlined herein.

17.2. Each county must include in the county collaborative plan an explanation of how money generated through the implementation of the eligible program will be used to support the participating programs in the county including contractual community programs and county school system provided programs.

17.3. If programs are a part of the collaborative county plan and providing 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.

§126-20-18. Health and Safety.

18.1. WV Pre-k classrooms must be provided in buildings or structures that are of sound structure and maintained in good repair.

18.2. WV Pre-k classroom facilities shall be equipped with approved heating units sufficient to provide a temperature of at least 68 degrees Fahrenheit (68°F) at floor level in all rooms used by children.

18.3. All buildings or structures housing WV Pre-k classrooms shall be of rat-proof construction and free of insects and rodents.

18.4. Toilet fixtures for all WV Pre-k classrooms shall be sized so that they may be used by children without assistance, or provide step stools and/or modified toilet seats that are safely constructed and can be easily used in lieu of specially sized toilet fixtures.

Good

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18.5. Lavatories in WV Pre-k classrooms ~~shall~~ be provided in or immediately adjacent to all toilet rooms. Lavatories shall have mixing faucets or be provided with tempered water. All lavatories shall be provided with soap and single services sanitary towels.

18.6. WV Pre-k classrooms shall provide useable floor space of at least 35 square feet per child and available for children's activities, exclusive of halls, bathrooms, the kitchen, office space, or storage areas. Useable outdoor play space of 75 square feet per child shall be provided.

18.7. WV Pre-k classrooms shall limit classroom size to no more than twenty children per classroom. Ratios shall be maintained at 1 adult: 10 children with one adult being a certified teacher in accordance with §126-28-8, Personnel Standards. *15 kids per class is better*

18.8. 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 West Virginia Department of Education child and adult food program. Programs operating less than four hours will provide a snack as prescribed the West Virginia Department of Education child and adult food program.

18.9. Immunization. All children entering an approved participating WV Pre-k classroom that is participating in the county collaborative plan shall follow the guidelines of the primary (providing 51% or more of the funding that year) funding source regarding immunization. Participating programs that operate within a public school facility must follow West Virginia Code §16-3-4.

18.10. Health Screenings. All children entering an approved participating WV Pre-k classroom that is participating in the county collaborative plan shall screen children 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 West Virginia Code §18-5-17.

§126-28-19. Program Evaluation.

19.1. Beginning with the school year which starts in August 2004, all participating programs shall use the Early Childhood Environment Rating Scale (ECERS, Harms, Clifford, and Cryer, 1998) as a self-assessment tool to evaluate the programs success in meeting the needs of the children. This self-assessment will be submitted annually by the 30th day of June to the West Virginia Department of Education, Coordinator of Early Childhood, Building 6, Room 318, 1900 Kanawha Boulevard, East, Charleston, WV 25305-0330.

19.2. Programs will be assessed using the ECERS by a trained outside evaluator every five years or if concerns from the West Virginia Department of Education, West Virginia Department of Health and Human Resources or county board warrant assessment.

126CSR28

19.3. At which time the state has money and manpower to provide monitoring using the ECERS, programs may be required to have a trained outside evaluator evaluate the program more frequently.

19.4. At which time a county has fully implemented their county collaborative plan and all eligible children in that county have access to a WV Pre-k classroom, the county board of education is required to annually submit a copy of the ECERS self-evaluation for each approved participating WV Pre-k program, a summary of the WV Pre-k services provided in the county, a collaborative agreement for each community partner providing services as an approved participating WV Pre-k program provider, the total number of WV Pre-k children served in each 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 Early Childhood Coordinator of the West Virginia Department of Education, by the 30th day of June (format attached). A copy of the report must be sent by the 30th day of June to the West Virginia Department of Health and Human Resources, Early Childhood Division.

What I liked

Guidelines

- ② That programs will utilize developmentally appropriate curriculum based on research.
 - That literacy is a focus
 - That children are viewed in the context of their family.
 - That staff will have the appropriate background for early ed.
 - That programs will be inclusive.
- ④ That provision is made to define family involvement + support.
- ⑤ That attendance will be addressed.
- ⑪ That Curriculum will cover all domains, will be appropriate, will build on children's strengths and will reflect individual children's needs.
- ⑮ That buildings must be in good repair and meet health and safety standards

What I feel should be changed

126-28-8 Personnel Standards

8.1 Teacher's qualifying certification should include pre-school special needs degrees since that degree/certification covers child development, (typical + atypical),
~~and~~

CONTACT NOTES

This form may be used to record the major points discussed with family members, and referrals and progress made.

To:

Date: 10/21/02

FAMILY NAME: Josi

☐ Phone

☐ Office/Center

☐ Home Visit

☐ Other

- * Concerned about afternoon classes only being 2 1/2 hrs long. and they want 3 1/2 hr classes
- * How Headstart is suppose to be it individual program how that will work with the public school system
- * Will 4 yr olds still be able to be in class w/ 3 yr olds. w/ different hrs required for 4 yr olds.
- * Will Headstart help employees that does not have their associates degree to obtain them.
- * I feel it is great the over-income children will have the same educational opportunities as the lower income children.

Name of Staff Member: _____

Comment Sheet

Kathy M.
Lisa A.
Lori W.:

1. What about space/in public school bldg. Could we lose our spot at the public school?
 2. About 3 1/2 hr. day. Will there be double class?
Will it be morning / afternoon?
 3. What is classroom size children to teacher / aide?
 4. ~~Do staff~~ Will meals be served family style / staff require to eat with them?
 5. If community children are in our classrooms do they have to have 2 h.v. / physical / dental
 6. Concern about bus transportation Are city's Allowed on the early bus with high school kids
- De.

Cathy Jones

From: JFarisathome@aol.com
Sent: Thursday, November 07, 2002 12:48 PM
To: ctrjones@access.k12.wv.us
Cc: annnutt@wvdhhr.org
Subject: Inquiry from PIECES Council Website/Recommendations from Well-Being Subcommittee

At the Nov. 1 meeting the committee worked on guidance for the county plan in relation to health and safety issues; Immunizations and Health Screens in particular. The different time frames for Public Schools, Child Care and Head Start seem to create more confusion than necessary. The committee recommends that a standard time frame be set for these requirements. On entry, is the most restrictive and would probably not be a problem for immunizations but health screens need to be given a little time - 30 days seems reasonable. The screening process in public schools often does not take place until spring semester which is not useful for children in Pre-K programs. We need to make those assessments at the beginning of the program so that follow-up and treatment can be initiated early, before the child loses ground due to poor vision or hearing etc. If you need further information let me know - Thanks -Joan Faris

Executive Summary
West Virginia's Universal Access to Pre-kindergarten System (WV Pre-k)
Policy 2525

This is an outline of specific issues of Policy 2525. Please read this information and in your own words make your public comments by email to ctrjones@access.k12.wv.us or by to mail :

Cathy R. Jones, Ed.D., Coordinator, Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, WV 25305-0330

I, David B. S. Johnston support these policies because I strongly believe that to implement collaborative classrooms these minimal standards must be met.

126-28-3 Definitions.

Page 3

3.7 -- Minimum program availability means offering each preschool class a minimum of three consecutive days/week for at least three and one half hours per day during the school year calendar.

Head Start Program Performance Standards and Other Regulations

Section 1306 – Page 249 - 250

1306.32 Center-based program option.

The Standards require that classes must operate for a minimum of three and one-half hours to a maximum of six hours per day with four hours being optimal and that the classes operate a minimum of four days per week. In collaborative partnerships operating days may be negotiated to a minimum of three.

I believe that at a minimum four year old Pre-k classrooms should operate three consecutive days a week and for no less than three and one-half hours each day.

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

Page 3

I believe the section of this policy should be strengthened to include: requiring each county plan to address how they will work with each family in the areas of Literacy, Parenting, Employment, and Wellness so that parents/guardians skills can be strengthened as children transition into Kindergarten.

126-28-6 Collaboration and County Plan.

Page 4

6.4 –In order to support counties in the effort to maximize existing resources and collaborate with other providers of early childhood education, no less than 50% of the classrooms for eligible children must be provided through contracts 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 or cannot meet the mandates of this policy. This may not be construed to mean that counties will provide education services in public school settings only and contract out support services both rather that 50% of the classrooms for eligible children must be contracted with qualifying providers in community settings. This ratio of community to public school providers can only be decreased with the written permission of both the West Virginia Board of Education and the Secretary of the West Virginia Department of Health and Human Resources. 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.

Head Start and Child Care have developed licensed classrooms set apart from local public school district's Pre-School programs. I support that a minimum of 50% of the four year old classrooms be contracted to community programs meeting the standards in this policy to provide the classroom space, qualified staff and financial resources to the meet the goal. There will be ample opportunities through county plans to bring public school staff and their resources out into the community to support the community classrooms.

126-28-8 Personnel Standards.

Page 6

8.1. Teachers must hold a qualifying certification/endorsement for teachers, specifically, early education, Prek-k endorsement, or birth to five.

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 January 1 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 126CSR136, West Virginia Board of Education Policy 5202 - Minimum Requirements for the Licensure of Professional/Paraprofessional Personnel and Advanced Salary Classification, Section15. Full time permits will be issued for:

8.2.1. persons with degrees in preschool special needs, elementary education, child and family studies with an emphasis on early childhood education, or child development, or

8.2.2. persons with a Board of Regents degree with a specialization in early childhood/child development, or

8.2.3. persons with an AA in child development/early childhood or occupational development with an emphasis on child development/early childhood and one year of early education teaching experience.

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 West Virginia State Registry and Training System (WV STARS) 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 0-1 years of experience and possess the ability to understand and practice the core competencies with direction and instruction or through sponsorship of a professional organization or qualified mentor. (Attached). Aides and assistants must have an individualized staff development plan for specifying his/her planned progression on the career pathway toward level V.

I strongly support sections 8.2 through 8.3 for qualifications and the full-time permit to assure qualifying certification/endorsement of personnel.

126-28-11 Curriculum and Assessment

Page 7 – Specific issues addressed in this area need to be/remain incorporated in the planning process for curriculum and assessment of four year old children.

The curriculum must be developmentally appropriate-not “watered-down” kindergarten/1st grade curriculum.

Components that must be incorporated included: whole child curriculum, emerging skills, pre literacy skills, continuum of development, readiness program and Transition.

I believe it is vital to the educational success of the child that parents/guardians are encouraged to participate in the child's learning experience as much as possible.

126-28-9. Regulation of Facilities and 126-20-18 Health and Safety.

Page 7 - 9.1. All approved participating WV Pre-k programs, see definitions, that are included in the county collaborative plan must meet the requirements as set forth in the West Virginia Division of Health Legislative Rules Child Care Centers 64CSR21 or any rule promulgated to replace and/or update 64CSR21. Public schools or other programs who are exempt under West Virginia Division of Health Legislative Rules Child Care centers 64CSR21 or its replacement must meet the requirements set for in that rule. In the case of public schools, West Virginia Department of Health and Human Resources Child Care Licensing staff will conduct monitoring and any recommendations for action made to the Office of Education Performance Audits.

Page 14 - 18.1. WV Pre-k classrooms must be provided in buildings or structures that are of sound structure and maintained in good repair.

18.2. WV Pre-k classroom facilities shall be equipped with approved heating units sufficient to provide a temperature of at least sixty-eight degrees Fahrenheit (68F) at floor level in all rooms used by children.

18.3. All buildings or structures housing WV Pre-k classrooms shall be of rat-proof construction and free of insects and rodents.

18.4. Toilet fixtures for all WV Pre-k classrooms shall be sized so that they may be used by children without assistance, or provide step stools and/or modified toilet seats that are safely constructed and can be easily used in lieu of specially sized toilet fixtures.

18.5. Lavatories in WV Pre-k classrooms shall be provided in or immediately adjacent to all toilet room. Lavatories shall have mixing faucets or be provided with tempered water. All lavatories shall be provided with soap and single services sanitary towels.

18.6. WV Pre-k classrooms shall provide useable floor space of at least thirty-five square feet per child shall be provided and available for children's activities, exclusive of halls, bathrooms, the kitchen, office space, or storage areas. Useable outdoor play space of seven-five (75) square feet per child shall be provided.

18.7. WV Pre-k classrooms shall limit classroom size to no more than twenty children per classroom. Ratios shall be maintained at 1 adult: 10 children with one adult being a certified teacher in accordance with §126-28-8, Personnel Standards.

18.8. 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 West Virginia Department of Education child and adult food program. Programs operating less than four hours will provide a snack as prescribed the West Virginia Department of Education child and adult food program.

18.9. Immunization. All children entering an approved participating WV Pre-k classroom that is participating in the county collaborative plan shall follow the guidelines of the primary (providing 51% or more of the funding that year) funding source regarding immunization. Participating programs that operate within a public school facility must follow West Virginia Code §16-3-4.

18.10. Health Screenings. All children entering an approved participating WV Pre-k classroom that is participating in the county collaborative plan shall screen children 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 West Virginia Code §18-5-17.

Performance Standards 1304 and 1306 - According to Head Start Performance Standards Head Start programs must meet the most stringent of regulations for the Safety

and Health of enrolled children - by meeting State Licensing Regulations or the Head Start Performance Standards at a minimum. The Regulation of Facilities and the Health and Safety areas of this Policy are minimal requirements to meet.

I support requiring all programs serving four year children in a pre-k setting to meet the West Virginia Department of Health and Human Resources Child Care Licensing Regulations. I also support OEPA of the State Department of Education in enforcing any correctional action plans identified through the Department of Health and Human Resources monitoring process.

Cathy Jones

From: Bub or Deb [leeson@ruralnet.org]
Sent: Sunday, November 10, 2002 3:24 PM
To: ctrjones@access.k12.wv.us
Subject: kindergarten aides assisting in p.e.

Dear Ms. Jones,

Please let me know the law concerning kindergarten aides assisting in physical education classes. Our principal told the aids they were to assist and the teachers are telling them they don't have to.

Aren't aides there for classes with more than 10 students for safety purposes? It is impossible for a Physical Education teacher to keep the class of 23 students going while tying shoes, taking some to the restroom and keeping eyes on all of them.

Your assistance will be appreciated.

Thank you,
Debbie Leeson

Cathy Jones

From: Ann Nutt [annnutt@wvdhhr.org]
Sent: Sunday, November 10, 2002 9:38 AM
To: ctrjones@access.k12.wv.us; vhuffman@access.k12.wv.us; fballroom@aol.com; jfarisathome@aol.com; bhuebner@mail.wvnet.edu; ktieman@tgkvf.org; Fred Boothe; Judy Curry; Kay Tilton; Mel Woodcock; Pam Roush; kay32246@yahoo.com
Subject: WV Pre-k TA Questions

At our last TA Steering Team meeting we agreed to circulate questions to all team members for response and discussion for consistency. Several have come to me recently so I thought we should start right now. Please reply to all your comments. I have put in italics some initial discussions I had with Cathy on one of these, please update or correct anything that should be different. As you have issues come up please circulate them also, you can send to me to send out or sent to the list. Thanks Ann

Employer sponsored child care

If a county wants to contract with an employer sponsored child care center that serves only the companies employees, can they do that - does it go against 13.2 speaking about creating segregated classrooms?

Offering WV Pre-K in an employer based community based setting supports section 12.1.7, minimizing the no. of settings in which care is received and offering continuity of care. An employer sponsored child care would not necessarily be a non-inclusive setting.

Public Preschool Classrooms

How do counties existing pre-k classrooms fall under meeting Policy 2525 and receiving school aid funding? The law states counties cannot expand without an approved plan and the policy § 126-28-17.1 states that funding will not be provided unless there is a county plan - is this new classrooms or all? Will a county that feels they already have adequate classrooms with existing public preschool classrooms be able to continue receiving funding for these classrooms without an approved plan?

* Counties would have to demonstrate that they could serve all four year olds.

6.4-"cannot meet the mandates of this policy"

Can a county school board simply exclude a child care center or Head Start because they do not have a certified teacher, without making resources available to meet this mandate? What is the expectation of the collaborative group in working for the success of each other?

West Virginia Childcare Centers United strongly supports the following components of Senate Bill 247:

- ◆ We support Parent/Guardian Involvement and Family Support 126-28-4
- ◆ We support Attendance 126-28-5 especially enrollment in an approved participating WV Pre-K program is voluntary. 5.1.
- ◆ We support Collaboration and the County Plan especially the maximization of existing resources and collaboration with other providers of early childhood education. We support that 50% or more of the county's provision of educational services to four year old 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 services do not exist in that county or cannot meet the mandates of this policy. 126-28-6
- ◆ We support Personnel Standards (126-28-8) in particular persons with an AA in child development/early childhood or occupational development with an emphasis on child development /early childhood and one year of early education teaching experience. 8.2.3. We support teachers must have early childhood training 8.1.
- ◆ We support Regulation of Facilities 126-28-9 especially West Virginia Department of Health and Human Resources Child Care Licensing staff will conduct monitoring and any recommendations for action made to the Office of Education Performance Audits. 9.1
- ◆ We support the curriculum standards as written in the legislative rule. Legislature Rule 126-28-11.
- ◆ We support the idea that SB 247 allows accessibility for all children through child care centers, Head Start, pre-school and public school.
- ◆ We support Transition and Continuity (126-28-12) especially each program participating in the county plan must have a written and implemented plan for transitioning children into kindergarten. 12.1 and to the extent possible, programs will be designed to minimize the number of settings in which a child receives education and care services. 12.1.7

West Virginia Childcare Centers United has strong reservations about:

- ◆ We do not support sending typical 3 years olds to Pre-K. 126-28-1.
- ◆ We would like to see quality training provided to pre-k teachers before they use the ECERS as a self-assessment. We would also like to see pre-K teachers utilize the ECERS for quality improvement and set goals to continually improve their program. 19.1

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Rebecca Miller

Title: Business: Pleasant Hill School
Kindergarten Teacher

Street Address: HC 68 Box 2

City/State/Zip: Grantsville, WV 26147

COMMENTS/SUGGESTIONS§126-28-1. General.

§126-28-2. Guidelines.**✓ §126-28-3. Definitions.**

It is not feasible for a rural county to provide half-day classes due to transportation difficulties.

Preschool Classes should be offered on alternating days so students can rest in between given long bus rides, length of the school day and physical demands of young children.

§126-28-4. Parent/Guardian Involvement and Family Support.**§126-28-5. Attendance.**

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

Our county shares students enrolled in Head Start and Day Care. A small, rural county does not have the resources to have 50% Community Programs.

Our current program meets the needs of the students.

§126-28-7. Waivers.

✓ **§126-28-8. Personnel Standards.**
Teachers should be certified to include specialization in early childhood endorsement.

All professionals working with preschoolers should be required to meet the same teaching standards as teachers working with other students in the County Board of Education System.

§126-28-9. Regulation of Facilities.

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System**COMMENT PERIOD ENDS: November 20, 2002**

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization:

*Jennie Queen
Pleasant Hill School*

Title: Business:

Teacher - 3rd Grade

Street Address:

HC 68 Box 2

City/State/Zip:

*Grantsville W
26147*

COMMENTS/SUGGESTIONS§126-28-1. General.

§126-28-2. Guidelines.**§126-28-3. Definitions.**

It is impossible for rural counties to have 1/2 day classes due to transportation concerns. Having students come on alternating days is best. Any other arrangement would cause too many concerns.

§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.**

Having 50% community programs would have a negative effect on our program. Please consider this responsibly.

§126-28-8. Personnel Standards. Current teaching certificates

to include specialization in early childhood endorsement.

§126-28-9. Regulation of Facilities.

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System**COMMENT PERIOD ENDS: November 20, 2002**

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization:

Edna Y. Robinson

Title: Business:Grade 3 Teacher
Pleasant Hill School**Street Address:**

Hc 68 Box 2

City/State/Zip:

Grantville, WV. 26147

COMMENTS/SUGGESTIONS§126-28-1. General.

2.1.7 School systems should employ certified teachers.

2.1.11 Class size should be small.

All students should be allowed in pre Kindergarten.

§126-28-2. Guidelines.**§126-28-3. Definitions.**

I don't think three consecutive days is necessary. County Systems should be allowed to work out a schedule that would benefit the students in each county. Rural Counties have a long bus ride for many children. It would be too expensive for half-day programs in these counties.

§126-28-4. Parent/Guardian Involvement and Family Support.**§126-28-5. Attendance.**

Parents should attend programs and get information on how to work with their children. Children should attend school regularly to get the most experience that is available to them. ~~Children~~

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

Pre Kindergarten classes are great at our school. We don't need these children to go to day care in 50% of the community programs. Some children do go to day care on their off-days. Regular attendance in the school system is a great thing for Pre Kindergarten children in our schools.

§126-28-7. Waivers.**§126-28-8. Personnel Standards.**

Teachers with a teaching certificate should be employed to teach these classes in our schools. All teachers should be required to meet the same standards.

§126-28-9. Regulation of Facilities.

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Kristie Ritchie

Title: Business: 1st grade teacher
Pleasant Hill Elem.

Street Address: H.C. 68 Box 2
Grantsville, WV

City/State/Zip: 26147

COMMENTS/SUGGESTIONS§126-28-1. General.

-Teachers of any age group
should be certified early childhood
professionals.

§126-28-2. Guidelines.**§126-28-3. Definitions.**

Alternating days for preschool students is more age appropriate. Rural counties, like ours, cannot provide 1/2 days for children due to transportation costs.

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

Home visits are a must when working with preschool aged children. This visit provides children / parents / teachers to establish an early home / school relationship.

§126-28-5. Attendance.

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

We have 2 small day cares in our rural county. Therefore to have 50% community programs would be a problem. Policy makers need to look at each county individually to see if they are meeting student needs.

§126-28-7. Waivers.**§126-28-8. Personnel Standards.**

- Early Childhood endorsement
- Certified professionals

§126-28-9. Regulation of Facilities.

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: LARRY STINN

Title: Business: PRINCIPAL, PLEASANT HILL SCHOOL

Street Address: 4068 BOX 2

City/State/Zip: GRANTSVILLE WV 26147

COMMENTS/SUGGESTIONS§126-28-1. General.

§126-28-2. Guidelines.**§126-28-3. Definitions.**

3.7 Half days would not be possible because of transportation in a rural county like Calhoun. Three consecutive days would not be good for children attending our all-day pre-school program. They need to alternate the days. Leave that decision to local school systems. Define this requirement in terms of minutes per week.

§126-28-4. Parent/Guardian Involvement and Family Support.**§126-28-5. Attendance.**

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

6.4 Do not require use to eliminate a school-based pre-school program (or part of it) to satisfy

§126-28-7. Waivers.**§126-28-8. Personnel Standards.**

3.1 Maintain existing requirements for the certification of teachers and aides - paraprofessionals. Do not lower these standards and do not grandfather in employees of Head Start or Day Care Centers.

§126-28-9. Regulation of Facilities.

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System**COMMENT PERIOD ENDS: November 20, 2002**

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Patricia R. Haught

Title: Business: Preschool teacher
Pleasant Hill Elem. School

Street Address: HC68 Box 2
Grantsville, WV

City/State/Zip: 26147

COMMENTS/SUGGESTIONS§126-28-1. General.

2.1.7 The school system should employ professionals who are ~~working~~ teachers with a specialization in early child hood.

2.1.11 Class size should be limited to 5:1 ratio when working with young children, especially when those young children are not potty trained.

§126-28-2. Guidelines.**§126-28-3. Definitions.**

3.7. It is next to impossible for rural counties to offer half-day preschool classes due to transportation issues. Preschool classes should meet on alternating days if students are attending full days. We need to focus on the amount of time per week that the child is given rather than consecutive days or half days.

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

4.1.2 Home visits are a very important part of preschool and a necessity for building a positive home/school relationship that will last for many years. However, teachers need to be allotted time in their schedule to conduct these visits.

4.1.5 Integrated preschool classrooms need certified professionals and paraprofessionals working with the children.

§126-28-5. Attendance.

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

6.4 Small counties do not have resources and personnel to have 50% community programs. Our county currently shares students with daycare + head start. Policy makers should look at individual counties + see what they currently have in progress and see if that meets the needs of the students in their county.

6.5 The state has spent money on developing and training representatives from all early childhood programs to form Tadpole teams in each county.

§126-28-7. Waivers.**§126-28-8. Personnel Standards.**

8.1 Current teaching certifications to include specialization in early childhood and early childhood special education endorsements.

8.2.2 All professionals working with preschool students employed by a County Board of Education should be required to meet the same teaching standards as teachers working with other students.

8.3 Persons employed to meet staff/child ratios such as aides, paraprofessionals should be paraprofessionals as outlined in the WV school law 18A-4-8 paraprofessional 18A-3-2a.

§126-28-9. Regulation of Facilities.

§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.

14.3 45 hours of training should be decided by the collaborative team or tadpole team. Teachers employed by county BOE should not be required to do additional staff development hours to meet county plans.

§126-28-15. Transportation.**§126-28-16. Program Oversight.****§126-28-17. Financing.**

Adequate funding needs to be in place to implement quality preschool programs. Programs use a lot of consumable materials and these need to be replaced quite often. Funding should also be provided for educational field trips and to reinforce learning opportunities.

§126-28-18. Health and Safety.

§126-28-19. Program Evaluation.

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start

Office of Instructional Services

West Virginia Department of Education

Capitol Building 6, Room 318

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us

Fax No.: (304) 558-6268

West Virginia Department of Education

1900 Kanawha Boulevard East

Charleston, WV 25305

([Phone List by Topics](#)) ([Staff Phone and Email by Name](#)) ([School Directory](#))

For suggestions, questions, problems contact the [webmaster](#)
Please read our [disclaimers](#)

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System**COMMENT PERIOD ENDS: November 20, 2002**

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Dorothy G. Nemitz

Title: Business: Paraprofessional Preschool/handicapped Classroom

Street Address: HC 68 BX17-D

City/State/Zip: Grantsville, WV 26147

COMMENTS/SUGGESTIONS§126-28-1. General.

Teachers should be teachers with a specialization in early childhood. Class size should be kept as small as possible. Preschoolers require a lot of care.

§126-28-2. Guidelines.

§126-28-3. Definitions. We are a rural, economically deprived area. We could not afford to transport students half days.

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

Home visits are invaluable. Not only do they set the tone for the child's entire educational life, but it affords the teacher's a more comprehensive view of the child & their needs.

§126-28-5. Attendance.

§126-28-6. Collaboration and the County Plan.**§126-28-7. Waivers.**

§126-28-8. Personnel Standards. - Standards should not be waived. Teachers should have ~~masters~~ the same requirements as others in the district. "Aides" should be paraprofessionals

§126-28-9. Regulation of Facilities.

§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. Transportation.

§126-28-16. Program Oversight.

§126-28-17. Financing.

§126-28-18. Health and Safety.

§126-28-19. Program Evaluation.

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start

Office of Instructional Services

West Virginia Department of Education

Capitol Building 6, Room 318

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us

Fax No.: (304) 558-6268

West Virginia Department of Education

1900 Kanawha Boulevard East

Charleston, WV 25305

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POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System**COMMENT PERIOD ENDS: November 20, 2002**

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: *Kim Batten*

Title: Business: *Physical Education Instructor*

Street Address: *HC 68 Box 2*

City/State/Zip: *Grantsville, WV 26147*

COMMENTS/SUGGESTIONS§126-28-1. General.

School systems should employ professionals who are certified with specialization in early childhood.

§126-28-2. Guidelines.**§126-28-3. Definitions.**

Half day is impossible for rural counties!

This alternating day gives these "young" students a day rest in between.

§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.

§126-28-9. Regulation of Facilities.

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System**COMMENT PERIOD ENDS: November 20, 2002**

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: *Jeff Huffman*

Title: Business: *Coordinator of Federal Projects
Lincoln County Schools*

Street Address: *10 Maryland Ave.
Hamlin, WV 25523*

City/State/Zip:

*(email
jwhuffma@access.
K12.wv.us)*
*(phone
824-3033, ext. 237)*

COMMENTS/SUGGESTIONS§126-28-1. General.

§126-28-2. Guidelines.**§126-28-3. Definitions.**

3.1. indicates that ESEA funds may be used to provide services required in Policy 2525. It is my understanding of current guidelines that the use of ESEA/Title I Funds to provide a requirement would create an issue of Supplement.

3.7. requires that classes meet 3 consecutive days per week for at least 3.5 hours per day. My experience gained by implementing a preschool program + supervising such has taught me that 2 days per week of full day classes are much more effective than 1/2 day classes. For many parents, transportation problems or issues of work schedules do not make 1/2 day class meetings effective.

§126-28-4. Parent/Guardian Involvement and Family Support.**§126-28-5. Attendance.**

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

Why are educational plans being submitted for approval to the West Virginia Department of Health + Human Resources? At what point did the WVDHHR move into the business of educating children? If the West Virginia Dept. of Education is not capable of adequately implementing educational programs, what higher level of expertise does the WVDHHR have to offer. This is the most outlandish happening that I have seen during the 16 yrs. that I have been in education!

(6.4.) If the goal of this movement is to work toward strengthening the Head Start Program, just say it + don't try to mask it in this or future policies. It is silly to hold a LEA accountable for what others are implementing + that is what will happen.

§126-28-7. Waivers.

§126-28-8. Personnel Standards.

If this is a program proposed, required and/or sanctioned by the WVDE, why not simply say that West Virginia Personnel Laws / Codes apply accordingly. When a school system employs staff for this or any other program, policies governing the employment of personnel. If not, the union representing teachers + service personnel will file one grievance after another. If it is not a WVDE sanctioned program, LEA's have no business participating! What is AA and WV STARS? Maybe I should know, but I don't and it would have been helpful if I would have had an explanation.

§126-28-9. Regulation of Facilities.

Are we looking at implementing an educational program or providing child care services? If it is an educational program, the WVDE + OEPA have guidelines that govern facilities. If we are discussing child care services, then leave that to the organizations that are in that business. I, as well as other parents, assume that responsibility when we bring a child into the world.

§126-28-10. Standards for Preparing Students.**§126-28-11. Curriculum and Assessment.**

(11.6.) - The statements in this section dictating the exclusion of student desks, mimeographed worksheets, + long periods of sitting appear to be in direct violation of a recent grievance decision in Cabell County. (Arbough vs Cabell County BOE, Docket No. 02-06-110 (Aug. 8, 2002.)). Dictating individual teaching styles/methods quickly abolishes individual creativity that is necessary for all good teachers.

§126-28-12. Transition and Continuity.**§126-28-13. Inclusive Environments.**

(13.2.) How will a County partner with Head Start and still meet this guideline. I have continually seen this program exclude students/children from the program based on the level of income of the family. Parents should be provided all information of each program/site in their area + let them choose what "educational" program/site they will have for their child.

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

14.1 and 14.3 appear to be contradictory in nature. 14.1 seems to be in alignment with current standards for professional employees in the current school system.

* For those teachers who have completed certification requirements to be licensed to teach in an early childhood setting, this requirement seems to be out of line. I believe the NCLB legislation adequately outlines requirements of highly qualified teachers.

§126-28-15. Transportation.

Again, there are policies that govern transportation requirements for LEA's. Is there a need to revise those policies to accommodate outside agencies that are providing little more than child care services?

§126-28-16. Program Oversight.

Assuming that this entire program is an educational program, it would appear to me that state oversight should be provided by the WDE. Local program oversight should come from the LEA if that LEA is to be responsible for implementation and to be accountable for achievement results and the reporting of such. By combining the oversight responsibilities of 2 agencies with different missions & goals, the end result will be confusion, strife, & lack of focus.

§126-28-17. Financing.

§126-28-18. Health and Safety.

§126-28-19. Program Evaluation.

What exactly is the ECERS designed to assess? I have not seen this instrument, but have heard from those familiar with it say that this is not a good instrument to evaluate ~~the~~ quality of an educational program.

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start

Office of Instructional Services

West Virginia Department of Education

Capitol Building 6, Room 318

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us

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West Virginia Department of Education

1900 Kanawha Boulevard East

Charleston, WV 25305

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To whom it may concern,

While I appreciate and respect the efforts of anyone or any organization that is working to provide quality services for the youth of West Virginia, I must say that this proposed policy (2525) appears to lack focus and direction. It appears that there is a real attempt to find a way of requiring childcare services and disguise those services as an educational program in order to involve county school systems.

If the intention of the policy is to require the offering of educational opportunities to children who are four years of age, then the place for that to happen is in a school setting and should be conducted, provided, directed, and supervised by professional educational staff. At the state level, that would be the West Virginia Department of Education. At the local level, that charge should be that of the county school system.

If the intention is to provide childcare services, then identify it as such and work with the agencies or individuals that are in that business. The West Virginia Department of Education has a different charge than to provide childcare services. I would also suggest that the West Virginia Department of Health and Human Resources has a different charge than that of becoming educational supervisors for the county school systems in the state of West Virginia.

I have great concerns regarding Policy 2525 and the requirements outlined in the document. I question the level of involvement from educators in preparing this policy that will greatly impact the role of educators who will be responsible for implementing the contents of the policy. This policy attempts to dictate to local school systems that they will partner with and share the responsibility in providing educational services to students with various organizations that have unique and varying missions while the responsibility for the end results will be the sole responsibility of the local school system.

By attempting to split state level oversight between the West Virginia Department of Education and the West Virginia Department of Health and Human Resources, confusion and strife will be the end result. These two entities, while attempting to share supervision of a single program, have vastly different missions and goals. Additionally, the local school systems that are attempting to implement the program and meet the vast requirements of each organization will struggle to provide quality programming as a result of the mixed messages that will follow. That being said, the *children* involved in the program will be the ones who suffer.

I may very well be wrong, but I see the implementation of this policy, as it is currently written, as nothing more than an attempt to strengthen the base for Head Start. Admittedly, I do not fully understand the goal of that organization but I have had limited engagement with the Head Start Program from the position of an elementary school principal and cannot say that the services I have seen provided are of sound educational practices. The children that were entering my school from the Head Start Program were not nearly as prepared for kindergarten in the areas of social/emotional or academic development as those children who had attended the preschool program that was offered at the school. I do not say that to criticize the Head Start Program and/or the staff of such, but the certified teachers that are on site at the school level better understand the needs of the children and are in a better position to prepare them for a successful beginning to kindergarten.

In closing, I urge you to develop a clear goal that is to be reached through the WV Pre-k program and enlist the services from those with the expertise to provide the services required to meet that goal. If the goal is to provide educational opportunities, then allow the West Virginia Department of Education to conduct their business. If the goal is childcare services, then allow the professionals in that field to conduct their business. Please do not mix the two and expect positive results to take place.

STEPHEN F. BOFFREDA
SUPERINTENDENT

JOSEPH L. PAINTER
ASSISTANT SUPERINTENDENT



P.O. Box 609
108 CHAPMAN AVENUE
SPENCER, WEST VIRGINIA 25276
TELEPHONE 927-6400

FAX COVER SHEET

Roane County Schools
P.O. Box 609
108 Chapman Avenue
Spencer, WV 25276
Phone: (304) 927-6400
FAX: (304) 927-6402

TO:

Dr. Cathy Jones

FAX NUMBER:

558-6268

FROM:

Willa Shenkle - Roane Co Preschool

DATE:

11/22/02

TIME:

10:37 AM

Number of pages (including this cover page)

2

If you do not receive all pages, please call (304) 927-6400.

This is the telephone number of the office where the FAX machine is located.

ROANE COUNTY SCHOOLS

Preschool Program
802 Madison Ave, Building A
Spencer, WV 25276
927-6440

November 21, 2002

Cathy R. Jones, Ed.D., Coordinator
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305

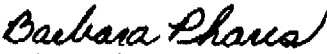
Dear Dr. Jones,

We would like to add a few thoughts to the comments we submitted on rule 28, West Virginia's Universal access to Pre-Kindergarten System (2525). Would it be possible to "grandfather in" as preschool teachers those teachers who have BA and MA degrees or certification in kindergarten, preschool special needs, or other special education fields who have significant work experience—possibly five or more years—working in child care, preschool, and, or, preschool special needs? A policy like this would enable experienced people to facilitate the start up of this state-wide program.

Also would it be possible to consider allowing people with degrees such as the above as well as those outlined in the policy to supervise preschool classrooms such as those provided by community based programs whose teachers may not have degrees, but have valuable experience to offer?

Thank you for your consideration of these suggestions.

Sincerely,


Barbara Phares


Willa Shenkle

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System**COMMENT PERIOD ENDS: November 20, 2002**

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Stephen G. Albaugh

Title: Business: Speech therapist
Pleasant Hill School

Street Address: HC 68 Box 2

City/State/Zip: Grantsville WV 26147

COMMENTS/SUGGESTIONS§126-28-1. General.

School system should employ professionals who are teachers with a specialization in early childhood.

§126-28-2. Guidelines.**§126-28-3. Definitions.**

3.7 Rural counties can not offer half-day classes because of transportation problems. Preschool classes should be on alternating day if the students are going all day. For example Monday/Wednesday/Friday.

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

Home visits are necessary when working with young children.

§126-28-5. Attendance.

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

§126-28-7. Waivers.

§126-28-8. Personnel Standards.

§126-28-9. Regulation of Facilities.

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System**COMMENT PERIOD ENDS: November 20, 2002**

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Rebecca Czaps

Title: Business: Teacher

Street Address: Rt. 3 Box 515

City/State/Zip: Arno Idsburg, W.V. 25234

COMMENTS/SUGGESTIONS§126-28-1. General.

School systems should only hire people who have a degree or specialization in Early Childhood Educ.

§126-28-2. Guidelines.**§126-28-3. Definitions.**

Rural counties can not offer half-day classes because of transportation problems. There is no way preschool can offer 3 consecutive days of preschool. We have to look at how long a day the kids are in school, including bus time.

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

Home visits are necessary when working with young children. This helps establish an early home/school relationship. The preschool teachers need time in their schedule to allow for working with families in their home.

§126-28-5. Attendance.

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

Small counties do not have the resources and personnel to have 50% community programs. Our county currently shares students with day care and head start.

The state has trained Tadpole members in each County; this should be developed into the collaborative planning team. The state needs to provide funding, time and resources to expand these meetings.

§126-28-7. Waivers.**§126-28-8. Personnel Standards.**

Current teaching certifications to include specialization in early childhood endorsement.

All professionals working with preschool students employed by a County Board of Educ. should be required to meet the same teaching standards as teachers working with other students in the school system.

§126-28-9. Regulation of Facilities.

To: Cathy Jones

From: Nikki's Child Development
Center

Re: Policy 25:25

258-1420

of PAGES including cover

87

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System**COMMENT PERIOD ENDS: November 20, 2002****Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.****Individual/Organization:**

LORI R. YOST

Title: Business:Nikki's Child Development Center
Assistant Director
Nikki's Child Development Center**Street Address:**

28 Ridersville Road

City/State/Zip:

Berkeley Springs, WV 25411

COMMENTS/SUGGESTIONS§126-26-1. General.

§126-28-2. Guidelines.

good to see teacher/child ratios to
be followed.

YES # 2.1.12 Community, federal, + state
resources

§126-28-3. Definitions.

Eligible Child # 3.6

like that child may remain in
program more than 1 year if it is
beneficial to the child.

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

without family involvement
this program will totally fail.

§126-28-5. Attendance.

agree with guidelines

make sure
voluntary
not mandatory

11/20/02

Policy 2525

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

great to have representatives
from all aspects of education.

§126-28-7. Waivers.

YES

There are lots of qualified teachers who
have been doing this job for years.
Granting ^{certificates} ~~certificates~~ through WStars and
others is a good idea.

§126-28-8. Personnel Standards.**§126-28-9. Regulation of Facilities.**

Policy 2525

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

~~If this is 4 yr olds let us~~
~~Remember~~

good must follow performance for
entry into kindergarten.

§126-28-11. Curriculum and Assessment.

All programs must
be developmentally
appropriate

These guidelines
are mainly
important in
maintaining a
quality early
childhood program

§126-28-12. Transition and Continuity.

good - like the idea that
children will get to visit kindergarten
before they go & that parents will
be well-informed of what to expect.

§126-28-13. Inclusive Environments.

agree with B.2 do not segregate
children - teaching tolerance is
extremely important

Policy 2525

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

Qualified staff extremely important
Totally agree using ~~State~~ registry training
process.

§126-28-15. Transportation.

15.1 supportive but not a
mandated service.

§126-28-16. Program Oversight.

Like that there has to be
accountability for things being
done, used and or spent.

§126-28-17. Financing.**§126-28-18. Health and Safety.**

Totally agree with
these guidelines - especially
immunization
& health screenings

§126-28-19. Program Evaluation.

*like the idea of
self - assessment and that
they are required to submit plan.*

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start

Office of Instructional Services

West Virginia Department of Education

Capitol Building 6, Room 318

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us

Fax No.: (304) 558-6268

West Virginia Department of Education

1900 Kanawha Boulevard East

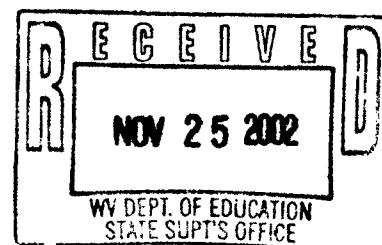
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POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002



Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Cathy Jones

Individual/Organization: Tammy Chambers

Title: Kindergarten teacher Business:

Street Address: 510 N 2nd Ave

City/State/Zip: Paden City, WV 26159

COMMENTS/SUGGESTIONS
§126-28-1. General. It has been my experience for the past nine years to witness students from various Early Childhood programs. Children coming from Head Start Programs appear to have a completely different philosophy when it comes to discipline. If programs are to become Universal, all programs need to operate with the same philosophy in order for transition to go smoothly. Behavior problems
§126-28-2. Guidelines. are very common with such programs. I also believe <u>any</u> teacher of children should be a certified teacher. It is not correct to assume that anyone can be a teacher. I do believe we need to communicate with all educational programs. Instead of turning everything upside
§126-28-3. Definitions. down we need to improve what is already in place.
§126-28-4. Parent/Guardian Involvement and Family Support.

1305 National Road, Wheeling, WV 26003

330 Fox-Shannon Place Ste 2, St. Clairsville OH 43950

Phone: Wheeling: 304-242-1390 (TDD also) St. Clairsville: 740-895-5979

Fax Wheeling: 304-243-5880 St. Clairsville: 740-895-8764

**Easter Seals
Rehabilitation Center**

Fax

To: Cathy R Jones ELD	From: Martha Hon
Company: DOE	Company: Easter Seals
Fax: 304-558-6268	Date: 11-20-02
Phone:	Number of Pages: 3
Re:	CC:

☐ Urgent ☒ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

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The Easter Seals Rehabilitation Center is a non-profit facility that provides physical, occupational, and speech therapies, early intervention services, social work services, medical services and advocacy to individuals with developmental delays and disabilities. Easter Seals primary service area includes Brooke, Hancock, Ohio, Marshall and Wetzel Counties in West Virginia and Belmont, Jefferson, Harrison and Monroe Counties in Ohio.

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System**COMMENT PERIOD ENDS: November 20, 2002**

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Martha HonTitle: President/CEO Business: Easter SealsStreet Address: 1305 National RoadCity/State/Zip: Wheeling WV 26003

COMMENTS/SUGGESTIONS	
§126-28-1. General.	wonderful vision but will take courage and determination to implement
§126-28-2. Guidelines.	
§126-28-3. Definitions.	

Page -2-

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

would like family support more defined.

§126-28-5. Attendance.

Concern about plans to deal with non-attendance
and tardiness

§126-28-6. Collaboration and the County Plan.**§126-28-7. Waivers.****§126-28-8. Personnel Standards.**

Concern about enough staff to cover the
needs of all organizations involved including
West Virginia Birth To Three

§126-28-9. Regulation of Facilities.

§126-28-10. Standards for Preparing Students.**§126-28-11. Curriculum and Assessment.****§126-28-12. Transition and Continuity.**

Concern that as much attention is paid to
entering the program as exiting the program

§126-28-13. Inclusive Environments.**§126-28-14. Staff Development and Training.****§126-28-15. Transportation.**

If transportation not offered will exclude
some children and families from participating

Page -4-

§126-28-16. Program Oversight.

§126-28-17. Financing.

Being an unfunded mandate and even if agency collaboration achieved, there will not be funding to implement program that meets needs of all involved

§126-28-18. Health and Safety.

§126-28-19. Program Evaluation.

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D., Coordinator, Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual / Organization: RESA-I Focus Group

Title Business:

Street Address: 400 Neville Street

City/State/Zip: Beckley, WV 25801

EMAILED
11/7/02
2:16pm

FAXED
11/20/02

COMMENTS/SUGGESTIONS

'126-28-1. General.

'126-28-2. Guidelines.

- 2.1.1. Clarification is needed on serving mandated 3 year olds
- 2.1.2. Definitive List of appropriate (accepted) curriculum
- 2.1.5. Definition of Scientific Research
- 2.1.6. Preschool content standards and objectives along with assessment tools need to be reviewed by core-collaborative planning team

'126-28-3. Definitions.

- 3.1 Counties will need guidance and Technical Assistant on how to blend funds
- 3.5 Counties need direction on the types of programs/curriculum that will be recognized as developmentally appropriate
- 3.6 Final decision when not in mutual agreement (parent/teacher) of advancement to Kindergarten program should rest with the teacher.

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

- 4.1.2. Number of home visits and frequency. After the e-mail change and to or
- 4.1.3. Definition of transition is needed (vertical on horizontal)

'126-28-5. Attendance.

- 5.1 Clarification is needed on dis-enrolling student for a number of days absent. Clarification is needed on what counts as enrollment in the school system, due to the type of collaboration that (school systems) are required to have with other agencies.

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

Technical Assistant is essential for collaborative funding and use of personnel

November 1, 2002
Policy 2525
Munson Hall
Allegheny County Board

Name	Agency	E-Mail
Katie Stump	Wyo. Co. Sch.	knstump@access.k12.wv.us
Becky Allen	Monroe Co.	rbjallen@access.k12.wv.us
Sarah Lee Brown	Summers Co Schools	sleebrown@aol.com
Kay Westfall	Summers Co. Schools	bkwestfa@inetone.net
Sharon Dyer	Mercer Co. Schools	sdyer@access.k12.wv.us
LINDA B. PRICE	RESA I	lbprice@access.k12.wv.us
Jana Comer Carr	Monroe Co. Head Start	jcomercarr@yahoo.com

✓

To Whom it May Concern ;

Hello, my name is Corinne Rice, I am the Chair person for the parent group at Piney Oaks Head Start here in Beckley, West Virginia.

The reason I am writing to you today is it has been brought to our attention , the parents of the head start center , a bill called 247 otherwise known as 25-25 ...that would make children at the age of four years old go to kindergarten rather than Head Start.

There were a few of us that would like to voice our opinions on this bill and hope to make a difference on whether or not this bill passes.

I have gotten the opinions from the other parents and have written these in this letter so that this can get to the right people who have influence in the decision making process that could make or break the future of our children .

----- 25-25 is not right ,things should not change they should stay the way they are . Four year old

children are too young for kindergarten, and the teachers are plenty qualified with their AA degrees and should not have to go back for their bachelor degrees.

Clara Grimes(304) 256-0564
Headstart Parent

----- Some kids are mature enough to go to kindergarten at four years old. And if more is expected it is okay as long as it's not too much.

Jamie Ward(304) 253-8774
Headstart Parent

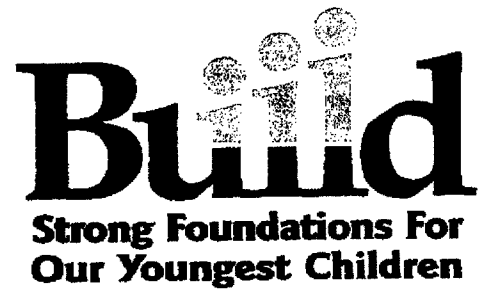
----- 25-25 is not a good idea because kids would have to start too early in such a vigorous atmosphere. Kids need to be kids at 4 years old...it is such a young age. Furthermore we are satisfied with the training that the teachers are receiving..and we would like to stick with the system we already have.

EllenEdmonds.....secondchance@zwallet.com
Headstart Grandparent

-----I feel that 2525 would be a great disaster. The children need to get used to the school environment before they are forced to go to school. They need to learn basic skills such as sharing, listening, playing well with others ...excetra. There are a lot of children that are not ready at five years old for kindergarten let alone four years old. The system should stay the way it is..the teachers should stay where they are .By putting these children in kindergarten they are being rushed into education and being expected to learn to quickly. By pushing them into education and forcing them to do things they are not ready to do it could make them less likely to pass into higher grades ,and then they would be more likely to resent school and produce a higher drop out rate.

-----Corinne Rice (304)255-7825 or
danny_fox25801@hotmail.com
Headstart Parent

FROM:
Barbara Gebhard
Build Initiative
5313 Pamela Circle
Cross Lanes, WV 25313
304-776-2940 Phone
304-776-8535 Fax
BGebhard@BuildInitiative.org



FAX TRANSMITTAL COVER PAGE

To: Cathy Jones

Organization: DOE

Fax Number: 558-6268

Number of Pages (following cover page): ~~3~~ 4

Message:

Cathy,
Good to see you recently.
Call me if any comments are
unclear.

Barbara

126CSR28

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Barbara Gebhard

Title: Project Director Business: Building Early Learning Systems in the StatesStreet Address: 5313 Pamela CircleCity/State/Zip: Cross Lanes, WV 25313

COMMENTS/SUGGESTIONS

§126-28-1. General.

§126-28-2. Guidelines.

Suggest combining 2.1.2 and 2.1.5.
Change 2.1.11 to "meet recommended (or required) teacher/child ratios and class sizes."

§126-28-3. Definitions.

3.5 Suggest substituting "language" for "cultural" or rewording to use the National Education Goals Panel domains of physical well-being and motor development, social and emotional development, approaches to learning, language development, and cognition and general knowledge.

3.8 is unclear and mixes terms that are not parallel but appear to overlap.

126CSR28

§126-28-4. Parent/Guardian Involvement and Family Support.**§126-28-5. Attendance.****§126-28-6. Collaboration and the County Plan.**

6.4 is good but could be strengthened with an initial statement that "Counties are strongly encouraged to contract with community programs." Also should specify the minimum percentage of funds through formula to be used through contractual agreements.

In 6.6, add family child care providers and

§126-28-7. Waivers. private early childhood programs.**§126-28-8. Personnel Standards.**

In 8.1, add that teachers should be registered at a particular level on the STARS career pathway.

8.3 is good but should clarify that aides must be registered on the career pathway. Suggest phrasing in higher starting level.

§126-28-9. Regulation of Facilities.

126CSR28

§126-28-10. Standards for Preparing Students.**§126-28-11. Curriculum and Assessment.**

11.4.6 h is unclear.

11.4.11 "complement" rather than "compliment."

11.6 is good to avoid inappropriate emphasis on academics.

§126-28-12. Transition and Continuity.**§126-28-13. Inclusive Environments.****§126-28-14. Staff Development and Training.**

14.3, last sentence is unclear.

§126-28-15. Transportation.

126CSR28

§126-28-16. Program Oversight.**§126-28-17. Financing.**

17.3 Are services to be provided at no cost for the entire day or only for 3½ hours?

§126-28-18. Health and Safety.

18.9 and 18.10 Work toward a consistent standard for all types of programs, based on best practices.

§126-28-19. Program Evaluation.

19.1 ECERS was not intended to be a self-assessment, so suggest consulting with authors before using it in this way.

Please Mail the Completed Comment Form to:
Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

✓

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Yvonne Santin / Wood County Schools

Title: Director of Special Education Business: education

Street Address: 1210 Thirteenth Street

City/State/Zip: Parkersburg, WV 26101

COMMENTS/SUGGESTIONS	
§126-28-1. General. Section 12.1.7: Change the word "shall" to "may".	
§126-28-2. Guidelines.	§126-28-2. Guidelines.
§126-28-3. Definitions The difference between the definitions of 3.2 and 3.3 is unclear. 3.7: change three and one half hours per day to a minimum number of hours per week.	

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

§126-28-5. Attendance.

Documentation must be completed to monitor trends (if any) for further planning.

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

Many of the components of this plan will be inaccurate as the data is difficult to retrieve, i.e., projection of 4 year olds over the next 10 years, number of children not enrolled in approved programs; projected costs up to 2013, funding sources up to 2013.

Part V: "to answer in detail" the following questions (which are not questions). This data is too specific. . . many of these items may need to be described as an assurance statement or to follow existing procedures.

Please Mail the Completed Comment Form to:
Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

126CSR28

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System**COMMENT PERIOD ENDS: November 20, 2002**

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization:

Title: Teacher Early Start for
Wetzel County Schools

Business:

Wetzel County Center for
Children and Families
• A Starting Points CenterStreet Address: RR2 Box 107City/State/Zip: New Martinsville, WV 26155**COMMENTS/SUGGESTIONS****§126-28-1. General.****§126-28-2. Guidelines.**

- 2.1. Is this Policy for Pre-K 4 year old students preparing for K?

§126-28-3. Definitions.

Presently, We have a Pre-K-4yr. old program in place for the past 10 yrs. It is operated by Board of Education in Wetzel County. We have a most unique Starting Points Center incorporating FRN, Headstart, Easter Seals, Even Start etc. A visit to our Center to see first hand how we operate would give valuable insight in the formulation of this Policy. 3.6 - Parent Choice concerning their child is vital to Education. 3.7 Placing a specific Day / amount of hours per day limits greatly the ability to provide scheduling accommodations and flexibility. • our schedule is 2 consecutive days - 5 hours per day.

126CSR28

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

4.1.5 - Preschool Special Needs is also part of our SP Center - we have these 10 years transitioned those students in to the Pre-K program.

4.1.6 - Parental Rights, concerning their child, to make decisions on their education as well as the individuality of all children must be preserved!

§126-28-5. Attendance.

5.1 - Attendance Policy is Important.

5.2 - Parents making decisions about the education of their child must be held responsible for those decisions and make provisions to carry through!

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

6.1 - It seems to me the Policy is giving County Boards of Education the Responsibility for the Plan but is withholding the necessary venue to carry through with the Plan.

§126-28-7. Waivers.

7.1 - We are already operating a Pre-K program in collaboration with PSN, Even Start, AmeriCorps, PAT housed in one Location. Approximately 145 students serving 02/03. Would not a Waiver for us be an Option? Waiver for an already Policy approved Program!

§126-28-8. Personnel Standards.

a.1 - The Pre-K Teachers should hold at time of employment a Teaching Degree no less than a 4-year Degree with a Specialization in Early Childhood. At Employment hold a WU Certification as an Early Childhood educator. ^{Early Childhood} Teachers know how 4 year olds Learn.

§126-28-9. Regulation of Facilities.

A visit to Wetzel County Center for Children and families would show a Unique pre-school Inner Agency relationship.

Non-Educated personnel do not have the skills necessary to maintain a Education Rich Pre-K environment w/ Best Practices utilized for 4 yr. old learning.

126CSR28

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

Content Standards & Objectives for K are quite stringent.
Pre-K program should/could be the avenue to prepare
for Transition to K.

§126-28-11. Curriculum and Assessment.

11.1 - Allowing only 1 curriculum - limits a creative, exemplary
educator of young children. (cripples)

11.6 - Excluding Desk re: age appropriate Tables/chairs
cripples the development of a child's preparation for writing, cutting etc.
and is not supportive of preparing Pre K for Kindergarten!

§126-28-12. Transition and Continuity.

12.1.7 - Non Duplication of Services is crucial
to Education in the future.

12.1 - We have these objectives in place and
operating smoothly in our Country.

§126-28-13. Inclusive Environments.

13.1 All RSN Pre K Students are Transitioned,
Included - Welcomed in our Pre K classrooms

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

14.1 - Staff Development is Vital to maintaining
Exemplary Educators. However, it must be
Needs based. 14.2 - Desired Results may follow

§126-28-15. Transportation.

15.1 - Bus Shuttle Service is provided for our
Pre-K students - parental choice to participate
is Voluntary.

Please
Eliminate
from Policy

but not
mandated by
this Policy.

126CSR28

§126-28-16. Program Oversight.

Responsibility is Vague - Seems like Double
Set of Rules & Regulations

§126-28-17. Financing.**§126-28-18. Health and Safety.**

18.7 - Class Size / Ratios are adequate but
not Utopia. 20/2 - adequate 10/2 - Utopia

§126-28-19. Program Evaluation.

Please Mail the Completed Comment Form to:
Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

West Virginia Community Action Directors Association

FAMILY MENTORING • COMMUNITY ECONOMIC DEVELOPMENT • RURAL COMMUNITY ASSISTANCE PROGRAM

P.O. Box 4007, Parkersburg, West Virginia 26104 • www.wvcommunity.org • Office: (304) 295-8807 • Fax: (304) 295-3249

November 17, 2002

Cathy R. Jones, EdD., Coordinator, Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard East
Charleston, West Virginia 25305-0330

Dear Dr. Jones:

Many of us said originally that "it couldn't be done" but you did it. Working in coordination with the WV Department of Human Resources, you have forged a document in Policy 2525 that represents the best thinking of a wide variety of stakeholders who have participated in the discussion of implementing SB 247.

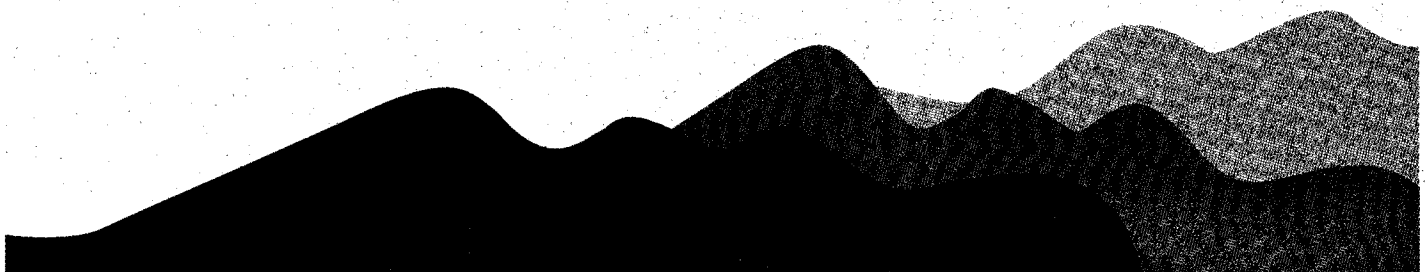
Together, we have faced many challenges in drafting the present document and I am sure there are many you have addressed singularly in your own right. We endorse the present draft as it stands.

Please be aware that I will be available to continue to work with you and Kay Tilton in implementing the program and ensuring that only the highest quality care and education is provided to our children.

Respectfully,



Dave Treharne, Executive Director



Nov-20-02

20:09

From-GRAND HYATT NY

+12126973772

+12126973772

T-764 P.001/002 F-017



Park Avenue at Grand Central
New York, NY 10017 USA

Telephone: 212-883-1234

Fax: 212-697-3772

Facsimile Transmittal Sheet

TO: Dr. Cathy Jones
FROM: Connie Stout WVAIC
FAX NUMBER: 1-304-558-6268
Total No. Of Pages: 2
RE: SB 247 / Proposed Rule 2525

☒ Urgent

☐ For Review

☐ Please Reply

☐ Please Comment

NOTES/COMMENTS

Comments deadline November 22, 2002

Thank you.

CSS

Comments on Policy 2525

Organization: West Virginia Association for the Education of Young Children – Members representing the Governing Board and Executive Committee

COMMENTS/ SUGGESTIONS

On behalf of WWAYC we would like to commend Dr. Cathy Jones and others involved for their leadership in the development of the proposed rule, West Virginia's Access to Pre-Kindergarten System (2525). We would like to express our appreciation for the efforts and preparation. After reviewing the document, WWAYC would like to make the following comments.

§126-28-10. Standards for Preparing Students

WWAYC recognizes the importance of a developmentally appropriate curriculum for implementation in the young child's classroom as well as the need for professional accountability through guidelines which may be found in the West Virginia Department of Education content standards and objectives. Our concern is in how the content standards will be implemented in the prek classroom. Please clarify what the expectations of the prek teachers in the implementation and design of curriculum related to content standards would mean. We are also concerned with what the expectations are for young children as well as the relationship of assessments to the content standards. Specify how the results of these assessments would be utilized. WWAYC would like to suggest language that would support standards being implemented and assessed in ways to optimize child development. We feel it is our ethical responsibility to ensure that standards are always used in the best interest of the child. Our organization feels that it is essential to provide opportunities for professional development for teachers and administrators related to learning how to integrate content standards with the focus on developmentally appropriate practices for young children.

§126-28-11. Curriculum and Assessment

WWAYC supports the curriculum design in that it is related to developmentally appropriate practices for young children. We would also support the necessity for assessments that are developmentally appropriate. Again, our organization feels that it is essential to provide training opportunities for professional development for both teachers and administrators related to the curriculum and assessment standards as well as the content standards and objectives.

Thank you,
Connie Stout
WWAYC President

Executive Summary
West Virginia's Universal Access to Pre-kindergarten System (WV Pre-k)
Policy 2525

This is an outline of specific issues of Policy 2525. Please read this information and in your own words make your public comments by email to ctrjones@access.k12.wv.us or by to mail :

**Cathy R. Jones, Ed.D., Coordinator, Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, WV 25305-0330**

I, Janet Alexander support these policies because I strongly believe that to implement collaborative classrooms these minimal standards must be met.

126-28-3 Definitions.

Page 3

3.7 – Minimum program availability means offering each preschool class a minimum of three consecutive days/week for at least three and one half hours per day during the school year calendar.

Head Start Program Performance Standards and Other Regulations

Section 1306 – Page 249 - 250

1306.32 Center-based program option.

The Standards require that classes must operate for a minimum of three and one-half hours to a maximum of six hours per day with four hours being optimal and that the classes operate a minimum of four days per week. In collaborative partnerships operating days may be negotiated to a minimum of three.

I believe that at a minimum four year old Pre-k classrooms should operate three consecutive days a week and for no less than three and one-half hours each day.

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

Page 3

I believe the section of this policy should be strengthened to include: requiring each county plan to address how they will work with each family in the areas of Literacy, Parenting, Employment, and Wellness so that parents/guardians skills can be strengthened as children transition into Kindergarten.

126-28-6 Collaboration and County Plan.

Page 4

6.4 –In order to support counties in the effort to maximize existing resources and collaborate with other providers of early childhood education, no less than 50% of the classrooms for eligible children must be provided through contracts 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 or cannot meet the mandates of this policy. This may not be construed to mean that counties will provide education services in public school settings only and contract out support services both rather that 50% of the classrooms for eligible children must be contracted with qualifying providers in community settings. This ratio of community to public school providers can only be decreased with the written permission of both the West Virginia Board of Education and the Secretary of the West Virginia Department of Health and Human Resources. 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.

Head Start and Child Care have developed licensed classrooms set apart from local public school district's Pre-School programs. I support that a minimum of 50% of the four year old classrooms be contracted to community programs meeting the standards in this policy to provide the classroom space, qualified staff and financial resources to the meet the goal. There will be ample opportunities through county plans to bring public school staff and their resources out into the community to support the community classrooms.

126-28-8 Personnel Standards.

Page 6

8.1. Teachers must hold a qualifying certification/endorsement for teachers, specifically, early education, Prek-k endorsement, or birth to five.

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 January 1 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 126CSR136, West Virginia Board of Education Policy 5202 - Minimum Requirements for the Licensure of Professional/Paraprofessional Personnel and Advanced Salary Classification, Section15. Full time permits will be issued for:

8.2.1. persons with degrees in preschool special needs, elementary education, child and family studies with an emphasis on early childhood education, or child development, or

8.2.2. persons with a Board of Regents degree with a specialization in early childhood/child development, or

8.2.3. persons with an AA in child development/early childhood or occupational development with an emphasis on child development/early childhood and one year of early education teaching experience.

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 West Virginia State Registry and Training System (WV STARS) 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 0-1 years of experience and possess the ability to understand and practice the core competencies with direction and instruction or through sponsorship of a professional organization or qualified mentor. (Attached). Aides and assistants must have an individualized staff development plan for specifying his/her planned progression on the career pathway toward level V.

I strongly support sections 8.2 through 8.3 for qualifications and the full-time permit to assure qualifying certification/endorsement of personnel.

126-28-11 Curriculum and Assessment

Page 7 – Specific issues addressed in this area need to be/remain incorporated in the planning process for curriculum and assessment of four year old children.

The curriculum must be developmentally appropriate-not “watered-down” kindergarten/1st grade curriculum.

Components that must be incorporated included: whole child curriculum, emerging skills, pre literacy skills, continuum of development, readiness program and Transition.

I believe it is vital to the educational success of the child that parents/guardians are encouraged to participate in the child’s learning experience as much as possible.

126-28-9. Regulation of Facilities and 126-20-18 Health and Safety.

Page 7 - 9.1. All approved participating WV Pre-k programs, see definitions, that are included in the county collaborative plan must meet the requirements as set forth in the West Virginia Division of Health Legislative Rules Child Care Centers 64CSR21 or any rule promulgated to replace and/or update 64CSR21. Public schools or other programs who are exempt under West Virginia Division of Health Legislative Rules Child Care centers 64CSR21 or its replacement must meet the requirements set for in that rule. In the case of public schools, West Virginia Department of Health and Human Resources Child Care Licensing staff will conduct monitoring and any recommendations for action made to the Office of Education Performance Audits.

Page 14 - 18.1. WV Pre-k classrooms must be provided in buildings or structures that are of sound structure and maintained in good repair.

18.2. WV Pre-k classroom facilities shall be equipped with approved heating units sufficient to provide a temperature of at least sixty-eight degrees Fahrenheit (68F) at floor level in all rooms used by children.

18.3. All buildings or structures housing WV Pre-k classrooms shall be of rat-proof construction and free of insects and rodents.

18.4. Toilet fixtures for all WV Pre-k classrooms shall be sized so that they may be used by children without assistance, or provide step stools and/or modified toilet seats that are safely constructed and can be easily used in lieu of specially sized toilet fixtures.

18.5. Lavatories in WV Pre-k classrooms shall be provided in or immediately adjacent to all toilet room. Lavatories shall have mixing faucets or be provided with tempered water. All lavatories shall be provided with soap and single services sanitary towels.

18.6. WV Pre-k classrooms shall provide useable floor space of at least thirty-five square feet per child shall be provided and available for children's activities, exclusive of halls, bathrooms, the kitchen, office space, or storage areas. Useable outdoor play space of seven-five (75) square feet per child shall be provided.

18.7. WV Pre-k classrooms shall limit classroom size to no more than twenty children per classroom. Ratios shall be maintained at 1 adult: 10 children with one adult being a certified teacher in accordance with §126-28-8, Personnel Standards.

18.8. 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 West Virginia Department of Education child and adult food program. Programs operating less than four hours will provide a snack as prescribed the West Virginia Department of Education child and adult food program.

18.9. Immunization. All children entering an approved participating WV Pre-k classroom that is participating in the county collaborative plan shall follow the guidelines of the primary (providing 51% or more of the funding that year) funding source regarding immunization. Participating programs that operate within a public school facility must follow West Virginia Code §16-3-4.

18.10. Health Screenings. All children entering an approved participating WV Pre-k classroom that is participating in the county collaborative plan shall screen children 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 West Virginia Code §18-5-17.

Performance Standards 1304 and 1306 - According to Head Start Performance Standards Head Start programs must meet the most stringent of regulations for the Safety

and Health of enrolled children -- by meeting State Licensing Regulations or the Head Start Performance Standards at a minimum. The Regulation of Facilities and the Health and Safety areas of this Policy are minimal requirements to meet.

I support requiring all programs serving four year children in a pre-k setting to meet the West Virginia Department of Health and Human Resources Child Care Licensing Regulations. I also support OEPA of the State Department of Education in enforcing any correctional action plans identified through the Department of Health and Human Resources monitoring process.

ROANE COUNTY SCHOOLS
PRESCHOOL PROGRAM

802 Madison Avenue, Room A
Spencer, WV 25276

927-6440

927-6405

11/15/02

Dear Dr. Jones

Here are comments from two teachers
in the Roane County preschool special
needs program on SB 247, rule number 28.

We are returning comment sections, but
not the entire copy of the rule we
were looking at. We collaborated
on all comments. Thank you for
this opportunity.

Sincerely

Barbara Phares
& Wella Shenkle

927-6440

ADMINISTRATIVE LAW DIVISION

NOTICE OF A COMMENT PERIOD ON A PROPOSED RULE

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

AMENDMENT TO AN EXISTING RULE: YES _____ NO X

IF YES, SERIES NUMBER OF RULE BEING AMENDED: _____

TITLE OF RULE BEING AMENDED: _____

IF NO, SERIES NUMBER OF NEW RULE BEING PROPOSED: 28

TITLE OF RULE BEING PROPOSED: West Virginia's Universal Access to Pre-kindergarten System (2525)

IN LIEU OF A PUBLIC HEARING, A COMMENT PERIOD HAS BEEN ESTABLISHED DURING WHICH ANY INTERESTED PERSON MAY SEND COMMENTS CONCERNING THESE PROPOSED RULES. THIS COMMENT PERIOD WILL END ON November 20, 2002 AT 4:45 p.m.. ONLY WRITTEN COMMENTS WILL BE ACCEPTED AND ARE TO BE MAILED TO THE FOLLOWING ADDRESS:

Cathy R. Jones, Ed.D., Coordinator

Office of Instructional Services

West Virginia Department of Education

Capitol Building 6, Room 318

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305

THE ISSUES TO BE HEARD WILL BE LIMITED TO THIS PROPOSED RULE NOT INCLUSIVE OF THE ATTACHMENTS.

INCLUSIVE OF THE ATTACHMENTS.

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: _____

Title: _____

Business: _____

Street Address: _____

City/State/Zip: _____

COMMENTS/SUGGESTIONS

§126-28-1. General. *I feel the ~~comment~~ period allowed to submit an initial plan is not long enough to review final version of these regulations and submit a quality plan by June 2003 that includes all items mentioned in 126-28-3.4.*

§126-28-2. Guidelines.

§126-28-3. Definitions

3.7 Could this be flexible such as two full days? or four half days?

FISCAL NOTE WORKSHEET

(Submit 4 Copies)

ID NO _____ DRAFT NO _____ BILL NO _____ RESOLUTION NO _____

SUBJECT Policy 2525 West Virginia's Universal Access to Pre-kindergarten 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 to the state through the school aid funding formula of fully implementing the West Virginia Pre-K System by 2012-2013 under West Virginia Code §18-5-44, is estimated to be \$48,823,301 over the next ten years. A large portion of this funding is existing formula money. New state aid formula funding dollars will primarily be needed only in the counties with increasing enrollments. As per the mandate of that code, resources from federal Head Start funds, Temporary Assistance to Needy Families (TANF)/Child Care Development Fund (CCDF), and start up funds through Title I of ESEA (now No Child Left Behind) will be fully utilized and are estimated to currently equal approximately \$41,000,000. The additional cost for Department staff is estimated to be \$250,000 for full implementation.

DATE

AGENCY

AUTHORIZED REPRESENTATIVE

10/03/02

West Virginia Department of Education

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

§126-28-5. Attendance.

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

6.4 If a current program, such as Headstart, is staffed by non-degreed personnel as teachers, how can this collaboration be arranged?

§126-28-7. Waivers.

7.1.3 experienced a decline in enrollment over what period of time?

§126-28-8. Personnel Standards.

8.1 Does this also apply to community providers or just to the school system? What is a path to give certification? Does a person with K-8 certification meet qualifying standards? A person with EISE has practiced ~~that~~ what is wr. 4 ten 126-28-11. and 126-28-12. It seems to me that the certification & practical experience need to count for something.

§126-28-9. Regulation of Facilities.

§126-28-10. Standards for Preparing Students. <i>Who has written the content Standards & where are they available?</i>
§126-28-11. Curriculum and Assessment. <i>Where is the list of curricula, curriculum enhancements and assessment processes available?</i>
§126-28-12. Transition and Continuity.
§126-28-13. Inclusive Environments. <i>13.2 How ~~can~~ will this affect Headstart which has economic level guidelines to qualify?</i>
§126-28-14. Staff Development and Training. <i>15.1 ~~seems to~~</i>
§126-28-15. Transportation. <i>15.1 seems to indicate school system is not required to provide transportation - parent needs to provide. 15.2 seem to indicate school system ^{or who?} must provide transportation which is it?</i>

§126-28-16. Program Oversight.

§126-28-17. Financing.

17.3 How would this affect a non-profit child-care center with a classroom for 4 yr olds? Currently parents pay for child care. If center collaborates as a 4 yr old classroom, would they not still be able to expect parents to pay for child care? Would center get school aid funding to compensate if they could not charge?

§126-28-18. Health and Safety.

§126-28-19. Program Evaluation.

Please Mail the Completed Comment Form to:
 Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
 Office of Instructional Services
 West Virginia Department of Education
 Capitol Building 6, Room 318
 1900 Kanawha Boulevard, East
 Charleston, West Virginia 25305-0330
 E-Mail Address: ctrjones@access.k12.wv.us
 Fax No.: (304) 558-6268

Mercer County Early Learning Center - Silver Springs
821 Broadway
Princeton WV 24740
Phone: 304-425-4251 Fax: 304-425-5117

FAX Cover Sheet

Date: 11/20/02From: N. WileyTo: Cathy Jones.Agency: WVDEFax No: (304) 558-6268Re: Comments 2525Number of Pages Including Cover: 4

Comments:

universal access to pre-K

pg. 4 separately

Mercer County Early Learning Center - Silver Springs
821 Broadway
Princeton WV 24740
Phone: 304-425-4251 Fax: 304-425-5117

FAX Cover Sheet

Date: 11/20/02From: N. WileyTo: Cathy Jones.Agency: WVDEFax No: (304) 558-6268Re: Comments 2525Number of Pages Including Cover: 4

Comments:

universal access to pre-K

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Nancy Wiley
Mercer Co. Early Learning Center-PctnTitle: teacher Business: _____Street Address: Broadway St.City/State/Zip: Princeton, WV 24740

COMMENTS/SUGGESTIONS

§126-28-1. General.

§126-28-2. Guidelines.

excellent!

§126-28-3. Definitions

3.6 - if a child under TEP is ^{and still can advance developmentally} deemed ready for K^g then with a label, the County System should facilitate his/her remaining at the preschool level through age five. If parents, et. al. make this decision, the system should not require a five-day program just because the child would have a full week ~~in~~ the K^g class.

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

§126-28-5. Attendance.

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

*challenging but
so appropriate.*

Please Mail the Completed Comment Form to:
Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

(over)

Re: facilities - When 20-23 children are grouped in a former elementary school room, clearly, there is no where near the "shall provide useable floor space of at least 35 sq. ft. per child ..." requirement of §126.20.18/18.6. Also, with 20-23 little bodies in this space, where does one provide all the excellent curricula suggestions/requirements included in this draft? (Space has impact on behavior, curricula, et. al.)

Re: 11.6 Excellent!

re: Transitioning - 12.1.3 crucial to quality

re: inclusion - proximity doesn't guarantee true inclusion. Quality programs reflect more than $A+B=C$.

This is an exciting event.



Box 244
Harrisville, WV 26362

Phone: 304-643-2383
Fax: 304-643-4752
Email: rtfm@ruralnet.org

Family Resource Network

Fax Transmittal Form

To (44) JONES

From BRAD RISON

Organization Name/Dept:
CC:
Phone number:
Fax number:

Phone: 304-643-2383
Fax: 304-643-4752
Email: rtfm@ruralnet.org

- ☐ Urgent
☐ For Review
☐ Please Comment
☐ Please Reply

Date sent:
Time sent:
Number of pages including cover page:

Message:

General info from Early childhood team

Thank you,

Brad Rison

RCFRN

Director

Ritchie County Family Resource Network

Early Childhood Team

P.O. Box 244 Harrisville, WV 26362 Phone (304) 643-2383

Ritchie County FRN: Working together for children and families."

Team members:

Ritchie County School ~ Preschool Teacher Debbie Beaver and Administrators

Head Start ~ Glenn Jones (Regional Director) Linda McDonald Ritchie Co. Rep

Small Beginnings Christian Center Daycare ~ Miranda Riser

St. Luke's Preschool ~ Mark McCutcheon

DHHR ~ April Skidmore

Parent of preschool aged child ~ Lisa Ayers

Family Resource Network ~ Brad Riser

Comments on 2525

- How can you mandate aids in Public Preschool, Head Start, Daycare, and Private Preschool to have degrees. In Ritchie County Schools, aids are being used at the high school and middle school without degrees. Could this discrimination?
- Can you examine some programs that already have programs existing? Some are working together and are very successful at collaboration.
- How will you deal with teachers who have both special needs preschool certification and regular pre K certification?
- The Head count maximum of 20 students: If we place children with developmental delays in the same classroom as their norming peers can we justify having a higher caseload than federal mandates. Additionally, will consideration be given to children who have severe delays? Will these children be counted as more than one?
- Will participating agencies have a say in curriculum, such as daycare, Head Start, private preschool?
- How will participating agencies get paid, and if this is a contract do they get paid at the beginning of the year or end. Private preschool and daycare cannot absorb the cost to take children and not get paid.
- Do childcare centers and private preschool have to worry about losing all 4 yr olds to preschool if they don't participate in 2525. Some are Christian based and may not agree with the rules designed through this plan.
- Can we access funds to continue planning and can we have more time to implement?
- Can we offer training to qualifying agencies that would be sufficient to meeting educational requirements?
- Two types of plans may need to exist for larger counties and smaller ones, because of declining enrollment.



Box 244
Harrisville, WV 26362

Phone: 304-643-2383
Fax: 304-643-4752
Email: rtfm@ruralnet.org

Family Resource Network

Fax Transmittal Form

To *Cathy Jones*

From *Bea R. Son*

Organization Name/Dept:
CC:
Phone number:
Fax number:

Phone: 304-643-2383
Fax: 304-643-4752
Email: rtfm@ruralnet.org

- ☐ Urgent
☐ For Review
☐ Please Comment
☐ Please Reply

Date sent:
Time sent:
Number of pages including cover page:

Message:

General info from Early childhood team

Thank you,

Bea R. Son

*RCFRN
Director*

Ritchie County Family Resource Network

Early Childhood Team

P.O. Box 244 Harrisville, WV 26362 Phone (304) 643-2383

Ritchie County FRN: Working together for children and families."

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Small Beginnings Christian Center Daycare ~ Miranda Riser
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DHHR ~ April Skidmore
Parent of preschool aged child ~ Lisa Ayers
Family Resource Network ~ Brad Riser

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- Two types of plans may need to exist for larger counties and smaller ones, because of declining enrollment.

FAX COVER SHEET

Date: November 20, 2002
To: Cathy Jones
Fax: 8-6268
Office: _____
From: Judy Curry
Of Pages: 8

Comments: Here are public comments on Rule 2525
from the Professional Development Committee and
from me.

**OFFICE OF SOCIAL SERVICES
350 CAPITOL STREET
ROOM 691
CHARLESTON, WV 25301**



Telephone: (304) 558-7980 FAX: (304) 558-4563
OR (304) 558-8800

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: PIECES Professional Development Committee

Title: State Level Committee

**Street Address: ATTN:Co-Chair, Judy Curry
WVDHHR
350 Capitol Street, Room 691**

City/State/Zip: Charleston, WV 25301

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.

8.2 The Personnel Committee strongly endorses the language in section 8.2 which allows for permits to be issued for a period of five years and encourages

the Department to keep this section as written.

8.3 The Committee would like to add to the language in 8.3. Based on the five year period given in section 8.2, the committee recommends that aides and assistants be given a period of five years to progress from level 2 to level 5 of the STARS career pathway.

§126-28-9. Regulation of Facilities.

9.1 The committee is concerned that the present language does not provide a process for private pre-schools that are not licensed to demonstrate compliance with licensing requirements. We would like to recommend that private preschools that are exempt from licensing that wish to participate in the WV Pre-k program be monitored by licensing specialists and any non-compliance issues be reported to the collaborative county team.

§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. Transportation.

§126-28-16. Program Oversight.

§126-28-17. Financing.

§126-28-18. Health and Safety.

§126-28-19. Program Evaluation.

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start

Office of Instructional Services

West Virginia Department of Education

Capitol Building 6, Room 318

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us

Fax No.: (304) 558-6268

West Virginia Department of Education

1900 Kanawha Boulevard East

Charleston, WV 25305

(Phone List by Topics) (Staff Phone and Email by Name) (School Directory)

For suggestions, questions, problems

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Judy Curry

Title: Child Care Program Coordinator

Street Address: WVDHHR

Division of Early Care & Education

350 Capitol Street, Room 691

City/State/Zip: Charleston, WV 25301

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.

I strongly endorse the language in this section with regard to the collaboration of all early childhood programs. I strongly support the policy that requires 50% of the classrooms to be in community programs. This will insure that we make the best use of federal Head Start dollars and do not supplant federal dollars with state dollars. It will also address the issue of keeping child care viable. If child care loses all four-year olds, they may not have sufficient funding to keep operating. If they close communities may lose child care options for children birth to three. I strongly urge you to keep the 50% requirement.

6.5 and 6.10 I am concerned that the rules do not require that more than one center be invited to participate in the planning process. With counties that have large numbers of centers, this is inadequate. I would like to add a requirement to section 6.10 that all child care and Head Start programs be invited to attend planning meetings, even though they are not official members of the collaborative team. This provides for an open and inclusive process and no partner will then feel that they were not included. .

§126-28-7. Waivers.

§126-28-8. Personnel Standards.

8.2 I strongly endorses the language in section 8.2 which allows for permits to be issued for a period of five years and encourage the Department to keep this section as written.

8.3 I would like to add to the language in 8.3. Based on the five year period given in section 8.2, I recommend that aides and assistants be given a period of five years to progress from level 2 to level 5 of the STARS career pathway.

§126-28-9. Regulation of Facilities.

I strongly endorse this requirement but would like to add some additional language.

9.1 I am concerned that the present language does not provide a process for private pre-schools that are not licensed to demonstrate compliance with licensing requirements. I would like to recommend that private preschools that are exempt from licensing that wish to participate in the WV Pre-k program be monitored by licensing specialists and any non-compliance issues and recommendations for action be reported to the collaborative county team or to the county board. Monitoring intervals for all WV Pre-k programs should follow time frames established in WV Code, Chapter 49, Article 2-B. Once a report and recommendations for action are made to the OEPA or to the county board/collaborative team, corrective action should occur within a specified time frame. If corrective action does not occur within the time frame, a report shall be made to the State Board of Education.

In addition, you have cited the Division of Health Rules, but not the correct rules for licensing. The Licensing Rules the West Virginia Division of Human Services Rules, Child Care Center 78CSR1. Ann Nutt picked up on this. I just wanted to be sure we gave you the correct number.

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

§126-28-11. Curriculum and Assessment.

I strongly commend the language in this section.

§126-28-12. Transition and Continuity.

The transition section is excellent. I strongly encourage the Board to keep Section 12.1.7 in particular. If we look at collaborative planning for young children, WV must look at the needs of the child for education and the needs of families to have care that enables parents to work or attend school. In other words, we must put the care in education and the education in care. WV schools need to be more responsive to the needs of working families and child care needs to provide enhanced educational services that promote school readiness.

§126-28-13. Inclusive Environments.

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

I strongly commend the curriculum requirements of this policy. I would recommend that we broaden the language requiring six hours of education on inclusive environments and just say six hours of education in issues relating to children with special needs.

§126-28-15. Transportation.

15.2 I suggest adding language that the collaborative team consider transportation issues in particular for working families and rural families.

§126-28-16. Program Oversight.

§126-28-17. Financing.

§126-28-18. Health and Safety.

§126-28-19. Program Evaluation.

I strongly support the use of environmental rating scales. However, I just saw one at the Head Start conference which evaluated the classroom on its literacy efforts. It is called the Early Language and Literacy Classroom Observation. Everyone was quite interested in this new tool. Is there any way to add something that allows for additional classroom observation tools to be used? The state may want to look at this.

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start

Office of Instructional Services

West Virginia Department of Education

Capitol Building 6, Room 318

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us

Fax No.: (304) 558-6268

West Virginia Department of Education

1900 Kanawha Boulevard East

Charleston, WV 25305

(Phone List by Topics) (Staff Phone and Email by Name) (School Directory)

For suggestions, questions, problems

FAX

To: Cathy Jones
(304) 558-6268

From: Terry Greene

Date: 11-20-02

Number of Pages: 6

Comments:

126CSR28**POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System****COMMENT PERIOD ENDS: November 20, 2002**

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Terry Greene / Wetzel County Schools

Title: Preschool Special Needs Teacher's Aide Business:

Street Address: RR 2, Box 107

City/State/Zip: New Martinsville, WV 26155

COMMENTS/SUGGESTIONS	
§126-28-1. General.	
§126-28-2. Guidelines.	
2.1.1	Readiness programs for 3 and 4 year olds.
2.1.2	This allows programs to adopt curriculums as research changes
2.1.3	This is very important for developmentally appropriate programs.
2.1.4	Important to look at the whole child.
2.1.5	This is very important for 3 and 4 year olds.
2.1.6	This will be utilized for children with special needs.
2.1.7	Employ highly qualified staff as defined by NCLB.

126CSR28**§126-28-3. Definitions.**

- 3.6 Families should have the option available to choose a program to meet their child's developmental needs. So if a child is of kindergarten age, but the team decides that the best placement would be to remain in a preschool setting this option should be available.**
- 3.7 This program availability must be determined at the site. Due to rural areas and scheduling, each County should have flexibility to try to use best practice theories.**

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

- 4.1.4 Follow procedures for the Board of Education's English as a Second Language.**

§126-28-5. Attendance.**§126-28-6. Collaboration and the County Plan.**

- 6.1 The timeline should be altered due to the delay in the passage of this policy.**
- 6.4 A mandated percentage for contracted community programs does not allow for the individual counties to plan and collaborate freely.**

§126-28-7. Waivers.

126CSR28**§126-28-8. Personnel Standards.****§126-28-9. Regulation of Facilities.**

9.1 WV Dept. of Education has facility requirements. This policy is for preschool programs not for child care centers. Therefore, the WV Dept. of Education requirements should be followed.

§126-28-10. Standards for Preparing Students.**§126-28-11. Curriculum and Assessment.**

11.1 This list should be updated regularly as new curriculum are developed.

11.5.1 But not limited to:

e. Writing, proper seating for writing includes tables and chairs

11.6 This is not appropriate or necessary to state in this policy due to the previous explanations of best practice and developmentally appropriate methods.

§126-28-12. Transition and Continuity.

126CSR28**§126-28-13. Inclusive Environments.****§126-28-14. Staff Development and Training.**

14.1 Staff development topics should remain open to the discretion of the administration and needs assessment.

14.2 This MAY follow.....

14.3 The public school sites should follow existing rules for maintaining the teaching license.

§126-28-15. Transportation.**§126-28-16. Program Oversight.**
This area needs clarification.**§126-28-17. Financing.****§126-28-18. Health and Safety.**

126CSR28

§126-28-19. Program Evaluation.

Please Mail the Completed Comment Form to:
Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268



FAX

TO: Cathy R. Jones

FROM: LaDawn Mitchem

SUBJECT: Policy 2525

PAGES: 2

COMMENTS:

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual / Organization: RESA-I Focus Group

Title Business:

Street Address: 400 Neville Street

City/State/Zip: Beckley, WV 25801

*Emailed
11/7/02
2:16pm*

COMMENTS/SUGGESTIONS

'126-28-1. General.

'126-28-2. Guidelines.

- 2.1.1. Clarification is needed on serving mandated 3 year olds
- 2.1.2. Definitive List of appropriate (accepted) curriculum
- 2.1.5. Definition of Scientific Research
- 2.1.6. Preschool content standards and objectives along with assessment tools need to be reviewed by core-collaborative planning team

'126-28-3. Definitions.

- 3.1 Counties will need guidance and Technical Assistant on how to blend funds
- 3.5 Counties need direction on the types of programs/curriculum that will be recognized as developmentally appropriate
- 3.6 Final decision when not in mutual agreement (parent/teacher) of advancement to Kindergarten program should rest with the teacher.

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

- 4.1.2. Number of home visits and frequency. After the e-mail change and to or
- 4.1.3. Definition of transition is needed (vertical on horizontal)

'126-28-5. Attendance.

- 5.1 Clarification is needed on dis-enrolling student for a number of days absent. Clarification is needed on what counts as enrollment in the school system, due to the type of collaboration that (school systems) are required to have with other agencies.

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

Technical Assistant is essential for collaborative funding and use of personnel

November 1, 2002
 Policy 2525
 Munson Hall
 Raleigh County Board

Name	Agency	E-Mail
Katie Stump	Wyo. Co. Sch	kstump@access.k12.wv.us
Becky Allen	Morrise Co.	bjallen@access.k2.wv.us
Sarah Lee Brown	Summers Co Schools	sleebrown@aol.com
Kay Westfall	Summers Co. Schools	bkwestfa@inetone.net
Sharon Dyer	Mercer Co. Schools	sdyer@access.k12.wv.us
LINDA B. PRICE	RESA I	lbprice@access.k12.wv.us
Jenna Comer Carr	Morrise Co. Head Start	jcomercarr@yahoo.com

Wetzel County Schools

PRESCHOOL SPECIAL NEEDS

Kim Sobatoka, MA EISP

RR 2, Box 107

New Martinsville, WV 26155

Phone: 304-455-2468

Fax: 304-455-5190

FAX

To: Cathy Jones
304 558-6268

From: Kim Sobatoka

Date: 11-20-02

Number of Pages: 6

Comments:

126CSR28**POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System****COMMENT PERIOD ENDS: November 20, 2002**

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Kim Sobataka / Wetzel County Schools**Title:** Preschool Special Needs Teacher **Business:****Street Address:** RR 2, Box 107**City/State/Zip:** New Martinsville, WV 26155

COMMENTS/SUGGESTIONS	
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§126-28-2. Guidelines.	
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126CSR28**§126-28-13. Inclusive Environments.****§126-28-14. Staff Development and Training.**

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This area needs clarification.

§126-28-17. Financing.**§126-28-18. Health and Safety.**

126CSR28**§126-28-19. Program Evaluation.**

Please Mail the Completed Comment Form to:
Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

FAX

To: Cathy R. Jones
Coord. of EC/ES

From: Carol Zombotti, Speech Pathologist

Date: 11-20-02

Number of Pages: 3

Comments:

Comments for Policy 2525. Thank you for allowing us to comment.

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System**Individual/Organization:** Carol Zombotti/Wetzel County Schools**Title:** Speech-Language Pathologist**Business:** Wetzel County Center for Children and Families**Street Address:** RR 2 Box 107**City/State/Zip:** New Martinsville, WV 26155**COMMENTS/SUGGESTION****126-28-2. Guidelines.**

- 2.1.7 "Staff with strong professional education preparation" should include a full-time permit and Professional Teaching Certificate.

126-28-3. Definitions.

- 3.6 Should include 3 year old children at risk. 128-28-1 includes 3-year olds.
- 3.7 Rather than 3 ½ hours a day for 3 days, this should say 10 ½ hours per week. This will prepare children better for the full day of Kindergarten.

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

- 4.1.4 Support services should guidelines from WVDE English as Second Language programs, including support to learn English language and maintain skills in native language. Each individual's needs should be examined and considered.
- 4.1.5 Should include support for children with disabilities integrated into programs as appropriate, as well as specialized programs dependent on child's need and disabilities.

126-28-5. Attendance.**126-28-6. Collaboration and County Plan.**

- 6.4 A mandated percentage of students enrolled in each program will leave behind numerous children in counties that are currently enrolled in public school settings.

126-28-7. Waivers.**126-28-8. Personnel Standards**

Personnel should educators with a Teaching Certificate in Early Education, Birth-5 or Pre-k. Persons with AA should not be issued a full-time permit until all requirements for Teaching Certificate are completed.

126-28-9. Regulation of Facilities.**126-28-10. Standards for Preparing Students.**

126-28-11. Curriculum and Assessment.

11.4 b. Should also include assistive technology so that children with all abilities can and may participate in all activities.

11.6 Developmentally appropriate strategies and procedures will be used to teach children necessary pre-requisites of goals and objectives stated in curriculum, including pre-writing activities at desks or tables, mimeographed work sheets to assist in pre-writing exercises, and increasing/learning attending skills through increased lengths of sitting and listening. Should not state what is to be excluded.

126-28-12. Transitioning and Continuity.

12.1.7 If children are only allowed to attend a minimum number of settings, collaboration will not exist.

126-28-13. Inclusive Environments.

Policy 2419 and IDEA contains guidelines of where and how children with special education needs should be educated. These statements should be coordinated with Policy 2419 and IDEA.

126-28-14. Staff Development and Training.**126-28-15. Transportation**

15.1 Transportation must be provided to children with special education needs as mandated by Policy 2419.

126-28-16. Program Oversight.**126-28-17. Financing.****126-28-18. Health and Safety.****126-28-19. Program Evaluation.**

HUNDRED HIGH SCHOOL

Orville G. Wright, Principal

PO Box 830

Hundred, WV 26575

Phone: 304-775-5221

Fax: 304-775-2922

FAX COVER SHEETTO: Cathy R. Jones, Ed. D
Coordinator, Early Childhood / Even StartFAX NUMBER: 304 - 558 - 6268FROM: Susan HillDATE: 11-20-02TIME: 3:20 pmNUMBER OF PAGES: (including this page) 4

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Susan Thiel, MA EISE
Title: Parents as Teachers Business: Wetzel Co. Schools
Street Address: P.O. Box 830 Rt. 250 N
City/State/Zip: Thunder, WV 26575

COMMENTS/SUGGESTIONS	
§126-28-1. General.	
§126-28-2. Guidelines.	2.1.7 - <u>Employ highly-qualified staff</u> as defined by NCLB
§126-28-3. Definitions.	3.7 Counties should be allowed the flexibility of "scheduling"

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

§126-28-11. Curriculum and Assessment.

11.1 This list should be updated regularly as new curriculum are developed

11.6 This does not belong in policy - Identified developmentally appropriate practices

§126-28-12. Transition and Continuity. Will be used by certified teachers

12.1 Transition is a critical ~~issue~~ issue.

Need Written plan for transition !!

§126-28-13. Inclusive Environments.

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

14.1 Staff development should be developed based on the needs of its staff

14.2 Should read "... professional development opportunities may follow the WV Star process, There may be more

~~§126-28-15. Transition.~~ effective ways to achieve desired results

14.3 This policy is not written for certified public school teachers. Please consider allowing the public school sites to follow the existing rules for maintaining the teaching license.

HUNDRED HIGH SCHOOL

Orville G. Wright, Principal

PO Box 830

Hundred, WV 26575

Phone: 304-775-5221

Fax: 304-775-2922

FAX COVER SHEETTO: Cathy R. Jones, Ed. D.
Coordinator, Early Childhood / Even StartFAX NUMBER: 304-558-6268FROM: Holly AshbyDATE: 11-20-02TIME: 3:20 PMNUMBER OF PAGES: (including this page) 4

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Holly Ashby / Wetzel County Schools
 Title: Preschool Special Needs Business: _____
also Certified Pre-K-K, regular education
 Street Address: 333 Foundry Street
 City/State/Zip: New Martinsville, WV 26155

COMMENTS/SUGGESTIONS

§126-28-1. General.

§126-28-2. Guidelines.

2.1.1. and 2.1.5 - Conflicting statements - 3 or 4 year olds??

2.1.7. - This should read "employ highly qualified staff as defined by NCLE"

§126-28-3. Definitions.

3.7 - Need to allow counties the flexibility of "scheduling" while meeting the intent of the law. Perhaps "a minimum of ten and a half hours per week during consecutive days during the school year."

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

§126-28-11. Curriculum and Assessment.

11.1 - This list should be updated regularly as new Curriculum are developed.

11.6 - Should be eliminated. This does not belong in policy - Identified developmentally appropriate practices will be used by Certified Teachers.

§126-28-12. Transition and Continuity.

12.1 Attention to transition is critical. This statement should read: "Each program participating in the County plan must have a written and implemented plan for transitioning children into kindergarten."

§126-28-13. Inclusive Environments.

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

14.1 Staff development topics should remain open to the discretion of the Administration and needs assessment.

14.2 please change this to read: "... professional development opportunities may follow the WV State process. There may be more effective ways to achieve desired results."

~~§126-28-15. Transportation.~~

14.3 This policy is not written for certified public school teachers. Please consider allowing the public school sites to follow the existing rules for maintaining the teaching license.

1.5.1-
Writing-
super seating
or writing
includes tallest
chairs.
could also
lead
but not limited
to:

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

§126-28-5. Attendance.

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

6.1 *Timeline should be altered due to the delay in the passage of this policy*

6.3 *County plans should be submitted for "full implementation" or until 2013.*

6.4 *A mandated percentage of contracted services will ensure "FAILURE" and negate the spirit of "collaboration" on which successful programs are based,*

§126-28-7. Waivers.

§126-28-8. Personnel Standards.

8.1 *Teachers must, without a doubt, hold qualifying certification and/or endorsement. Certified Staff is a MUST !!!*

§126-28-9. Regulation of Facilities.

9.1 *Refer to WV Dept. of Education policy for preschool programs (facility requirement)*

These requirements should be followed if program is based with a school facility

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

§126-28-5. Attendance.

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

- 6.1 *Timeline should be altered due to the delay in the passage of this policy.*
- 6.3 *County plans should be submitted for "full implementation" or until 2013.*
- 6.4 *A mandated percentage of contracted services will ensure "failure" and negates the "spirit" of collaboration on which successful programs are based.*

§126-28-7. Waivers.

§126-28-8. Personnel Standards.

- 8.1 *Requiring Certified staff is a MUST !!! Teachers must hold qualifying Certification/Endorsement !!!*

§126-28-9. Regulation of Facilities.

- 9.1 *W.V. Dept. of Education has facility requirements. This policy is for Preschool programs not for Child-Care centers. Therefore, the W.V. Dept. of Education requirements should be followed if programs are housed within the school facilities.*

P.O. Box 1370
Clarksburg, WV 26302-1370
Phone: (304) 624-3325, Ext. 3361
Fax: (304) 624-3361

Harrison County
Board of Education

Fax

To: Cathy R. Jones, Ed.D. From: Bobbie Gelpi
Fax: (304) 558-6268 Date: 11-20-02
Phone: _____ Pages: 4
Re: _____ CC: _____

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

•Comments:

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System**COMMENT PERIOD ENDS: November 20, 2002**

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Bobbie Gelpi, Harrison County Board of Education

Title: Director, Early Childhood Business: _____

Street Address: 408 E. B. Saunders Way - P.O. Box 1370

City/State/Zip: Clarksburg, WV 26302-1370

COMMENTS/SUGGESTIONS
§126-28-1. General. Applaud the intent to make consistent preschool opportunities available.
§126-28-2. Guidelines. Approve the intent to provide developmentally appropriate environments to all children.
§126-28-3. Definitions. 3.7 Minimum program availability The length of a day for both WVDE & WVDHHR should be identical. If not, then a 3½ hour day is too long for personnel purposes. Teachers may not exceed an 8 hour day. The seven hours of instruction does not allow for lunch, planning and travel time.
§126-28-4. Parent/Guardian Involvement and Family Support. 4.1.2 Documented methods of communicating with parent/guardian "which may include" We cannot be required to email parents who are not online.

COMMENTS/SUGGESTIONS**§126-28-5. Attendance.**

5.1 The final determination for the child's attendance shall be made by the principal for preschool students, just as it is for kindergarten students.

§126-28-6. Collaboration and the County Plan.**6.4. Collaboration and the County Plan**

The requirement for 50% of the classrooms to be in community settings places an undue burden on school systems. Our system is currently operating 30% of its centers in collaboration with other reliable agencies. Some of these are located within the public schools. Why could these not count toward collaborative efforts in community settings? It would seem the intent is not to encourage collaboration, but to be sure that preschool classrooms are not placed in the public school setting. Both the 50% requirement and the definition of community settings should be changed. It also behooves us to consider those groups who may choose (some for religious reasons) not to be part of the plan. These could account for a significant portion of the population of a county, making it even more difficult to achieve the 50%.

9.1 Regulation of Facilities

We have attempted to place one of our collaborations into a childcare facility that has been licensed for several years to a private childcare entity in our community. The site has become available to us while the owner is on criminal probation. Both the licensing coordinator and the fire marshall have refused to license that same facility to us for our collaboration. Thousands of dollars have been spent by our collaboration on the physical plant: furnace, steps, paint, carpentry and electrical work. The site is still deemed unacceptable for licensure, even provisionally. Since our efforts have only improved the site, it is difficult to understand how improving it according to the directions of the licensing coordinator and fire marshall have failed to make it licensed and usable for our collaboration, but acceptable for a private daycare.

10.1 Standards for Preparing Students

Does this standard mean that any participating agency must use the adopted curriculum at all times? What would this mean for daycare centers and faith-based groups? How would this be monitored?

16.1 Program Oversight

We need a more well-defined mechanism or model for monitoring program implementation at all sites for all agencies involved in the plan.

17.2 Financing

This is another unfunded mandate. Preschool programs are expensive and excellent preschool programs are incredibly expensive.

Please Mail the Completed Comment Form to:
Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, WV 26305-0330
E-Mail Address: ctrjones@access.k12.wv.us
Fax No.: (304) 558-6268

126CSR28

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System
COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization:

Title: Ohio County Schools

Business:

Street Address: 2203 National Road

City/State/Zip: Wheeling, WV 26003

COMMENTS/SUGGESTIONS
§126-28-1. General. 2.1.1 and 2.1.5 seem to conflict. Is it 4 year olds only, or 3 and 4 year olds? 2.1.7 – This should read “employ certified staff...”
§126-28-2. Guidelines.
§126-28-3. Definitions 3.6 – Four year olds should be toilet trained as a condition of entrance. Providing changing stations will incur additional expenditure on already strained budgets. 3.7 Consecutive days per week is not realistic and impedes flexibility and creativity. Three and one half hours per session is too long and eliminates the possibility of two sessions per day resulting in fewer students served.
§126-28-4. Parent/Guardian Involvement and Family Support. 4.1.1 and 4.1.2 have no place in policy. They are far too prescriptive. 4.1.5 – It is unreasonable to expect that all students with special needs will benefit from full inclusion. Provisions for alternative preschool classes must be made for some students (for example: severely autistic, tube fed, etc.)

§126-28-5. Attendance

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

6.1 – Because the passage of this policy has been delayed, June 2003 is a short turnaround time. To prepare a thorough and functional plan, the due date should be moved to June 2004. This still allows up to 9 years for implementation. This policy is being developed under the aegis of the West Virginia Board of Education, and county plans are required by county boards of education. Why is approval needed from DHHR?

6.3 – It seems redundant and inefficient to re-submit plans every year for up to 9 years, although implementation may not occur sooner due to the extreme financial responsibility.

6.4 – Collaboration with community programs is welcomed, but the prescription of an arbitrary percentage of collaboration is cumbersome and will impose an unnecessary burden on counties and agencies. It also could have the negative effect of decreased level of services.

§ 126-28-8. Personnel Standards

8.1 – Requiring certified staff is commendable.

§ 126-28-9. Regulation of Facilities.

9.1 – WV Board of Education is responsible for all aspects of education. Why is it necessary to mandate supervision from DHHR, an outside agency? It will be very difficult to serve two masters.

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

§ 126-28-11. Curriculum and Assessment

11.4.1 – Should read: “be based upon the county mission and goals and follow the West Virginia Content Standards and Objectives.” All other parts of this section are far too prescriptive and should be eliminated. 11.6 is a particular affront because qualified, certified teachers will teach effectively without such instruction.

Effective policy is a framework based on current research that allows room for extension and enrichment by policy implementers. Policy should not be a laundry list of confining and sometimes conflicting activities that will detract from programming in many centers.

§ 126-28-12. Transition and Continuity.

12.1 Attention to transition is critical. This statement should read: “ Each program participating in the county plan must have a written and implemented plan for transitioning children into kindergarten.” The statement should end there. Please see Paragraph 2 above under § 126-28-11.

§ 126-28-1. Inclusive Environments.

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

126CSR28

14.1 – The staff development requirement of 18 hours annually is reasonable, however, effective staff development is more personalized and based on needs. Please do not mandate the topics of annual staff development!

14.2 Please change this to read: "...professional development opportunities MAY follow the WV STARS process. There may be more effective ways to achieve desired results.

14.3 14.3 This policy is not written for certified public school teachers. Please consider allowing the public school sites to follow the existing rules for maintaining the teaching license.

§ 126.28.15. Transportation.

§ 26.28.1. Program Oversight.

16.1 This section is unclear, but it appears that it could result in two sets of rules, and resulting ill effects.

§ 126.28.17. Financing.

§ 126.28.18. Health and Safety.

§ 126.28.19. Program Evaluation.

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start

Office of Instructional Services

West Virginia Department of Education

Capitol Building 6, Room 318

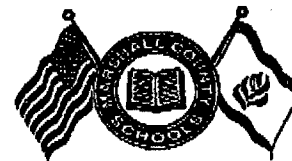
1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us

Fax No.: (304) 558-6268

FACSIMILE MARSHALL COUNTY SCHOOLS



To: Cathy Jones

Company: _____

Fax Number: 304-55 8-6268

Re: _____

Date: 11/20/02

Pages: (Including Cover Sheet)

From: Nendy Clutter

Comments:

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System**COMMENT PERIOD ENDS: November 20, 2002**

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization:

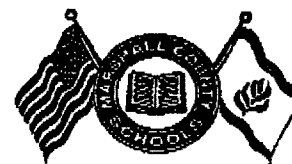
Title: Marshall County Schools Business:Street Address: PO Box 578City/State/Zip: Moundsville, WV 26041*Mindy R. Clutter***COMMENTS/SUGGESTIONS****§126-28-1. General.****§126-28-2. Guidelines.****§126-28-3. Definitions.**

3.7 The three and one half hour per day requirement is not realistic or appropriate. This precludes the teacher from working with two different groups during any given day. It does not allow for flexible use of staff or facility.

The requirement of three consecutive days requires students to possibly be out of the learning environment for four consecutive days. This causes difficulties with retention and is not the best schedule for families and children. The requirement of three consecutive days per week again limits staff and site utilization.

FACSIMILE

MARSHALL COUNTY SCHOOLS



To: Cathy Jones

Company: _____

Fax Number: 304-558-6268

Re: _____

Date: 11/20/02

Pages: (Including Cover Sheet) 4

From: Wayne Simons

Comments:

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System**COMMENT PERIOD ENDS: November 20, 2002**

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization:

*Wayne Simmons*Title: Marshall County Schools

Business:

Street Address: PO Box 578City/State/Zip: Moundsville, WV 26041**COMMENTS/SUGGESTIONS****§126-28-1. General.****§126-28-2. Guidelines.****§126-28-3. Definitions.**

3.6 Being toilet trained should be a condition of entrance into the program. Budget limitations faced by school systems should be considered in establishing this type of requirement.

3.7 The three and one half hour per day requirement is not realistic or appropriate. This precludes the teacher from working with two different groups during any given day. It does not allow for flexible use of staff or facility. The requirement of three consecutive days per week again limits staff and site utilization. Is this the most optimal schedule for students?

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

4.1.5 All preschool students should not be expected to be fully included in regular education classes. The extent of inclusion should be based on the individual student's IEP. . . not on an arbitrary standard.

§126-28-5. Attendance.**§126-28-6. Collaboration and the County Plan.**

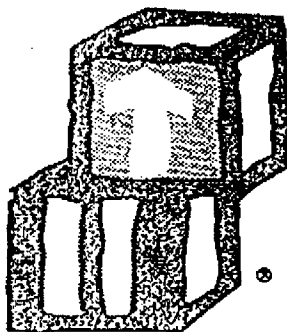
The due date for the plan should be moved to June 2004. Given the delay in the passage of the policy, the June 2003 is not a realistic date for the development of such a comprehensive and broad based plan.

This policy is an Education Policy. Why is DHHR approval necessary?

§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.****§126-28-12. Transition and Continuity.****§126-28-13. Inclusive Environments.****§126-28-14. Staff Development and Training.**

14.2 Professional Development should follow whatever process is most appropriate for the particular situation. Why must we be mandated to follow the WV STARS process?



FAMILY DEVELOPMENT, INC. HEAD START®

925 - 24th Street
Parkersburg, WV 26101
(304) 485-7404 • FAX (304) 485-0499

Glenn Jones
Director

DATE: 11-20-02

TO: Cathy Jones

COMPANY: Office of Instructional Services

FAX NUMBER: 558-6268

NUMBER OF PAGES IN THIS TRANSMISSION INCLUDING COVER
SHEET 4

(If you did not receive all pages, or find they are illegible, please call).

MESSAGE: WVBOE Policy 2525 Comments

Hard Copy in Mail

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*"Touching Children - Reaching Families"
Equal Opportunity / Affirmative Projects*

**Comments/Suggestions Regarding
WVBOE Policy 2525**

Individual: Carl Mace
P.O. Box 333
St. Marys, WV 26170

- 126-28-1. General
- 1.1. Scope. Please reference the Federal code by number.
 - 1.2. All participating agencies should follow the most stringent in effect for all component area of Policy 2525.
- 126-28-2. Guidelines.
- 2.1.1. Please reference the Federal code by number.
- 126-28-4. Parent/Guardian Involvement and Family Support.
- 4.1.2. A minimum of one home visit per semester should be required.
- 126-28-6. Collaboration and the County Plan.
- 6.5 thru 6.9. County/agency pupil transportation directors have been inappropriately omitted. They are responsible for organizing pupil transportation logistics, such as building bus routes and writing schedule descriptions; coordinating school and busing schedules; as well as the transfer of students between and among other buses/other modes of transportation used to transport pupils to/from school/classroom sites. They cannot coordinate these activities without key information provided by the other entities named in 6.5. and 6/6, in order to meet the requirements of 6.9.
- Additionally, it needs to be noted the height of the first step (riser) on a full sized school bus may not exceed 14 inches. Can these three and four year old children deal with such.
- 126-28-7. Waiver
- A number of small, rural West Virginia counties will have little difficulty meeting Requirements 7.1.1., 7.1.2., 7.1.3., and 7.1.4.

No safeguards appear to be in place to prevent a county from selling school buildings no longer in use or expending marginal financial surpluses so as to ensure that it will receive a waiver from full implementation of WV Pre-K.

126-28-8. Personnel Standards

Regarding 8.1, and 8.2., and 8.3., a preschool SPED teacher is certified to teach all children with various typed of delays, but they are required in Policy 2525 as unable to teach a typical, developing child. Under this policy, a regular ED Pre-K Teacher with NO training in SPED does not have to be SPED certified to teach the developmentally delayed child.

Obviously, the present Policy 2525 requirements may be construed as unfair and unequal treatment of those within an occupational grouping and could be grounds for grievances/law suits.

126-28-12. Transition and Continuity.

12.1.7. Any existing policy requiring the transportation of students by the county of residence to a nearby county that provides mandated service not offered by the county of residence, should be included and referenced by policy number in this section.

126-28-15. Transportation.

15.1. Some rural West Virginia counties must transport over 90 percent of their students to school. This section apparently assumes that all single-parent households, nationally estimated to be 40 percent of all households, have the means of transporting their three and four year olds to classroom sites and providing transportation for county and extra-curricular trips.

126-20-18. Financing.

17.1. Does this EXCLUDE the inspection of Headstart buses by WVDE School Bus Inspectors?

126-20-18. Health and Safety

18.8. U.S.D.A. guidelines should be referenced by name and code number.

Will the WV Commissioner of Agriculture provide Federally Donated Foods Inspectors to, at least annually, verify inventory and accountability; safe and proper storage, as well as identify misappropriation/theft; timely usage, and order the disposal of outdated Federally Donated Foods used by any collaborative agency involved in WV Pre-K?

18.9. Federal guidelines for Headstart agencies state that the safety and welfare of all children shall be ensured. Therefore, Headstart guidelines for immunization

**Raleigh County Schools
Special Education Dept.**

136 Sullivan Road
Glen Morgan, WV 25847

Fax No.: 256-4563 or 256-4715

FAX

TO: Dr. Cathy R. Jones
FROM: Raleigh County Preschool Special Needs Teachers
DATE: 11/20/02

Number of pages, including cover: 2

MESSAGE:

Thank-you for the opportunity to
comment on Policy 2525

Please call (304) 256-4555 if all pages are not received.

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Suggestions/Recommendations

2.1.15

We feel that an inclusive program is an excellent idea.

8.2.1

We strongly feel that teachers certified in Pre School Special Needs should be qualified to instruct preschool children. They have successfully developed curriculum, taught challenging children, as well as their typical peers. Many have been presenters at state level preschool conferences and adjunct college faculty. The preschool special needs teachers of Raleigh County have participated in many in-service trainings to enrich their professional development. We would strongly recommend that preschool special needs teachers be considered to hold qualifying certification.

14.1

The training requirements are unclear and do not appear to reflect and include requirements of the county school regulations (i.e. Title I, special education, etc).

18.5 & 18.6

These are basic requirements but our elementary schools presently are not equipped to accommodate these proposals.

18.7

Quality programming is recommend throughout this document. The caseload nullifies the quality of this policy. The ratio of 20 children to 2 adults reflects quantity and not quality.

We strongly suggest that the caseload limit be lowered to reflect the individual needs of young children. It should consider the very special individual needs of children with disabilities. The adult/child ratio must be flexible to accommodate specific needs. For example, cerebral palsy, autism, Down Syndrome, spina bifida, behaviorally challenged, fetal alcohol syndrome, and those exposed to drugs in utero.

Anita Milam
Beverly Mamone
Susie Brock
Mitzi Haga
Linda Bunce
Ann Darby
Diana Chipley
Billie Arthur

FAX

Suite 864

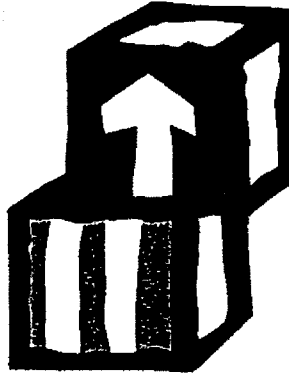
150 South Independence Mall West
Philadelphia, PA 19106-3499

Date

11/20/02

Number of pages including cover sheet

4 pgs



To:

Cathy Jones
DOE
WV

Phone

Fax Phone

CC:

From:

Nancy Elmore
HEAD START UNIT

Phone

Fax Phone

(215) 861-4048
(215) 861-4071

REMARKS:

☒ Urgent☐ For your review☐ Reply ASAP☐ Please comment

Comments on Policy 2525

IF RETRANSMISSION IS NECESSARY, PLEASE CALL



DEPARTMENT OF HEALTH & HUMAN SERVICES
Administration for Children and Families, Region III

Suite 864
150 S. Independence Mall West
Philadelphia, PA 19106-3499

November 20, 2002

Dr. Cathy R. Jones, Early Childhood Coordinator
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330

RE: Comments on Policy 2525 – WV's Universal Access to Pre-kindergarten

Dear Dr. Jones:

We are submitting the following comments for your consideration with respect to the Department of Education's proposed Policy 2525.

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

4.1 – We wholeheartedly concur with the importance of the involvement of parents in the education of their children, as reflected in this section. To further underscore the value of parent involvement in preschool programs, you may wish to add language to this section that encourages pre-kindergarten programs to welcome parent involvement in the classroom. Such language might parallel the Head Start performance standards, which require that classrooms be open to parents during program hours. Parents must be welcomed as visitors and encouraged to observe children in the classroom and to participate with children in group activities.

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

6.4 – We applaud the effort to maximize existing resources by requiring that 50% of the pre-kindergarten classrooms be served through contracts with community providers. This provision will encourage valuable partnerships between local school systems, Head Start, and child care – building upon the strengths and unique features each has to contribute. It will also ensure that new programs are not created where there is already a qualified provider in the community, eliminating the potential for duplication of services and competition for slots. For the same reasons, we also support the requirement that a portion of the funds generated by the formula be used through the contractual agreements to support compliance with this policy.

Page Two – Dr. Cathy Jones

126-28-7. Waivers.

7.2 – We recommend that county requests for waivers contain the written concurrence of the core community partners who would normally make up the local planning team.

126-28-8. Personnel Standards.

8.1& 8.2 – We support the mandate that teachers of preschool children be certified in early childhood education or closely related fields, such as preschool special needs. The research clearly demonstrates that it is not effective to teach four year-olds in the same manner as older aged children. Research shows that a “push-down” to pre-kindergarten of methods and materials used in elementary school or middle school is inappropriate for preschool children, and can actually be harmful to them. The challenge for preschool teachers is to develop classroom activities that teach while engaging and developing children's interests. This provision would prohibit the transfer of displaced teachers from higher grades to preschool classrooms without first obtaining the credentials necessary to teach four year olds. We urge you to retain this provision in the final policy.

8.2 – The provision of full time permits for experienced early childhood educators who do not hold one of the three qualifying degrees cited in section 8.1 is critical to the success of this initiative. This is the vehicle that will enable community providers to collaborate successfully with local school systems in making universal pre-kindergarten a reality. This provision underscores the relationship between teacher qualifications and classroom quality, while at the same time providing a window of opportunity that enables experienced, high performing teachers in community programs such as Head Start and child care to proceed along a continuum of professional development toward a qualifying certification. We urge you to retain this provision in the final policy.

126-28-9. Regulation of Facilities.

9.1 – We support the requirement that all programs serving preschool children meet West Virginia licensing standards, and encourage you to retain this provision in the final rule.

126-28-11. Curriculum and Assessment.

11.1 through 11.6 – We fully support this “whole child” approach to curriculum and assessment. These research based standards recognize the cognitive, physical, social, emotional and health needs of preschool children. The level of detail provided in this section lays the groundwork for quality pre-kindergarten programs that support school readiness across a broad spectrum of providers, and safeguards against the “push-down” of elementary school methods and materials in teaching pre-k children. We highly recommend the retention of this entire section in the final policy.

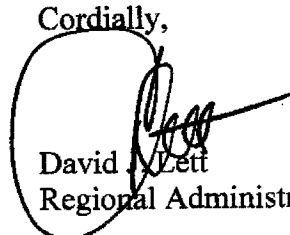
Page Three – Dr. Cathy Jones

126-20-18. Health and Safety

18.7 – We strongly concur with the limitation on classroom size to twenty children, and with the 1:10 ratio of adults to children. The benefits of these standards reach well beyond the important and obvious health and safety considerations. Research has shown that small classrooms and adequate teacher/child ratios are critical to the quality and success of early childhood education programs. Furthermore, these standards will facilitate Head Start's ability to partner with local school systems, since the standards are consistent with Head Start requirements that set the average class size at seven to ten to twenty, with no more than twenty children per classroom. Similarly, the 1:10 teacher/child ratio will also facilitate Head Start's ability to serve as a community program, since Head Start classes must be staffed with two adults – a teacher and an aid or two teachers and, whenever possible, a volunteer. Any increase in the class size or teacher/child ratios proposed in this policy would pose a barrier to Head Start's participation in the universal pre-kindergarten system.

Let me close by expressing my sincere thanks to you and your colleagues for your fine work in laying the foundation for universal access to pre-kindergarten in West Virginia. I appreciate the opportunity to comment in support of this groundbreaking policy that offers great promise to West Virginia's young children.

Cordially,



David J. Lett
Regional Administrator

126CSR28

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Early Head Start

Title: _____ Business:

Street Address: 1433 Dorsey Ave.

City/State/Zip: Morgantown, WV 26501

COMMENTS/SUGGESTIONS
§126-28-1. General. This is a very ambitious but vital project for our state. The results will be worth the efforts, I am sure.
§126-28-2. Guidelines. I especially like the items 2.1.2., 2.1.5., 2.1.7. , and 2.1.8.
§126-28-3. Definitions.

126CSR28**§126-28-4. Parent/Guardian Involvement and Family Support.**

Education is the key to self advancement and the home is vital to that connection. When parents are interested in the school life then the child will also be connected to learning.

§126-28-5. Attendance.**§126-28-6. Collaboration and the County Plan.****§126-28-7. Waivers.****§126-28-8. Personnel Standards.**

I have seen teachers make all the difference in a child's learning and life--new buildings and texts are nice but can never replace human enthusiasm. The teachers must have a love of what they do to be effective.

126CSR28**§126-28-9. Regulation of Facilities.****§126-28-10. Standards for Preparing Students.****§126-28-11. Curriculum and Assessment.**

I believe young children learn through play; providing developmentally appropriate environments facilitating play is vital. Assessment is an important component as well. Worksheets and workbooks should have no place in preschool classrooms. This is where good teachers appear! If you have quality-based teachers who are prepared and trained, then the children thrive.

§126-28-12. Transition and Continuity.**§126-28-13. Inclusive Environments.****§126-28-14. Staff Development and Training.**

This area is very important to be included and responsive to staff needs and concerns.

Policy 2525

Individual/Organization: Betsy Knittle – Kanawha County Schools

Title: Head Start/LEAP Teacher – Sissonville Elementary (304) 348-1961

Street Address: 8324 Sissonville Drive,

City/State/Zip: Sissonville, WV 25320

Comments/Suggestions 126-28-1 General**126-28-2 Guidelines.****126-28-3.****3.1 Approved funding sources**

All of these funding sources have specific guidelines and regulations. While some overlap, pre-K teachers spend a great deal of time doing redundant paperwork. Perhaps a copy of the proposed plan and common paperwork could be submitted to and accepted by each agency before we come to rely on them as a funding source.

3.6 Eligible child

In addition to chronological age, developmental age needs to be considered in the make-up of the classroom. The classroom may consist of three year olds whose developmental age is twelve months and five year olds who are preparing for kindergarten. It will be difficult, if not impossible, to meet all of these needs in a class of twenty children. There needs to be other options available or something added to the proposed plan that would take in consideration the individual needs of each classroom and ways to provide additional staff support.

3.7 Minimum program availability

Mandating three and one half hour sessions in the school system is disastrous. Most elementary schools schedules, especially if busing is involved, run from 8:00AM – 3:00PM – Seven hours. If you are going to provide two 3 1/2 hour pre-K sessions a day, they will have to be scheduled back-to-back. That means:

- No lunch break or planning time for teacher or aides. (It has been suggested that other teachers in the building could provide this break time, however, most are already assigned to lunch duty.)
- No time to clean-up or to prepare activities for the second session. (Most Head Start/LEAP programs provide "family-style" lunches in the room.)

- Most important is the issue of safety. Trying to transition up to 40, three and four year olds, some with special needs, in and out of the classroom all at the same time is a daunting challenge. Some stay for daycare, some are picked up by parents and some go on buses. Most of these children do not know their bus numbers, street or route addresses, or phone numbers. The potential for a mishap is very high.

I realize that you probably chose this length of time to coincide with the Head Start guideline - 1306.32 (12)(b)(2) Center-based classes must operate a minimum of three and one-half to a maximum of six hours per day with four hours being optimal. However, there is another Head Start regulation that has been disregarded for years.

1306.32 (12)(c)(3) - Double session variation

Each double session classroom staff member must be provided adequate break time during the course of the day. In addition, teachers, aides and volunteers must have appropriate time to prepare for each session together, to set up the classroom environment and to give individual attention to children entering and leaving the center.

(There is currently a grievance pending in Kanawha County Schools regarding this matter.)

Perhaps a Federal Head Start waiver could be applied for to reduce the pre-K day to three hours, three to four days a week.

12-28-4.

4.1. Parent involvement

Having dealt with parents over a number of years rather than "must" include, I feel that this section should specify that parents "will be given the opportunity" to participate in two parent/guardian conferences.

4.1.3 Transitions

To make these transitions plans work, pre-K and kindergarten teachers must be given time and substitutes to attend meetings and to plan together.

126-28-5 Attendance

5.2 Chronically absent

Typically, families whose children are chronically absent, often have numerous personal and social problems. Could something be added to the plan to provide a social work component?

126-28-8. Personnel Standards.

8.1

Grandfather in those teachers who have degrees, three or more years of pre-K teaching experience, and whose evaluations reflect a knowledge of early child development and curriculum.

126-28-10. Standards for Preparing students.

Currently, there is a wide gap between pre-K "play-based" curriculum and the WV kindergarten IGO's. More teachers need to become involved in the early planning process.

126-28-12. Transition

12.1.3

Perhaps pre-K and kindergarten teachers could use the staff training days before the start of school for these transition activities. Unless specific provisions are made, these activities just do not happen.

Betsy Knittle
BK WV 25@aol.com

Cathy Jones

From: Cfsprice@aol.com
Sent: Wednesday, November 20, 2002 9:06 PM
To: ctrjones@access.k12.wv.us
Subject: Policy 2525 Comments

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System
[REDACTED] In order to support counties in the effort to maximize existing resources and collaborate with other providers of early childhood education, no less than 50% of the classrooms for eligible children must be provided through contracts 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 or cannot meet the mandates of this policy. 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 community settings. This ratio of community to public school providers can only be decreased with the written permission of both the West Virginia Board of Education and the Secretary of the West Virginia Department of Health and Human Resources. 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. 126-28-4 Parent/Guardian Involvement and Family Support I believe that each family must have a pre-enrollment home visit by the preschool teacher and assistant in addition to two parent-teacher conferences. [REDACTED]

§3126-28-8. Personnel Standards.8.1. Teachers must hold a qualifying certification/endorsement for teachers, specifically, early education, Pre-k-k endorsement, or birth to five.8.2. A full time permit shall be issued and valid for one school year and shall expire on the thirtieth day of June. 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 126CSR136, West Virginia Board of Education Policy 5202 - Minimum Requirements for the Licensure of Professional/Paraprofessional Personnel and Advanced Salary Classification, Section 15. Full time permits will be issued for:8.2.1. persons with degrees in preschool special needs, elementary education, child and family studies with an emphasis on early childhood education, or child development, or8.2.2. persons with a Board of Regents degree with a specialization in early childhood/child development, or8.2.3. persons with an AA in child development/early childhood or occupational development with an emphasis on child development/early childhood and one year of early education teaching experience. 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 West Virginia State Registry and Training System (WV STARS) 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 0-1 years of experience and possess the ability to understand and practice the core competencies with direction and instruction or through sponsorship of a professional organization or qualified mentor (attached). Aides and assistants must have an individualized staff development plan for specifying his/her planned progression on the career pathway toward level V. §3126-28-9. All approved participating WV Pre-k programs, see definitions, that are included in the county collaborative plan must meet the requirements as set forth in the West Virginia Division of Health Legislative Rules Child Care Centers 64CSR21 or any rule promulgated to replace and/or update 64CSR21. Public schools or other programs who are exempt under West Virginia Division of Health Legislative Rules Child Care Centers 64CSR21 or its replacement must meet the requirements set forth in that rule. In the case of public

schools, West Virginia Department of Health and Human Resources Child Care Licensing staff will conduct monitoring visits and any recommendations for action will be made to the Office of Education Performance Audits. [REDACTED]

[REDACTED] 10.1§126-28-10. Standards for Preparing Students.10.1. Programs participating in the county's collaborative plan must adhere to the West Virginia Department of Education content standards and objectives for eligible children's programs which are aligned with the Head Start outcomes framework and kindergarten content standards and objectives. The content standards and objectives for programs serving eligible children are written to reflect a level of performance that supports successful transition into kindergarten. [REDACTED] (11.1-11.6)§126-28-11. Curriculum and Assessment.11.1. Only curricula and curriculum enhancements that are included on the list of accepted curricula and curriculum enhancements may be used by programs participating in the county plan.11.2. Curricula, curriculum enhancements and assessment processes will be approved following the process established by the West Virginia Department of Education, including, preschool special education, for adoption of instructional materials.11.3. Curriculum and assessment, along with the content standards and objectives, will be parts of an inter-related system that measures the child's progress on a continuum of development and are utilized to individualize the children's educational opportunities.11.4. Curricula 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:a. meeting the content standards and objectives for eligible children as prescribed by the West Virginia Board of Education.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, 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.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 morethan 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 compliment to, not substitute for, effective teaching or good curriculum. 11.4.12. include an assessment process 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 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 activityh. art,i. music.11.6. Classroom design and program implementation for eligible children must exclude the use of desks, mimeographed 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. (14.1 through 14.3)§126-28-14. Staff Development and Training.14.1. Each county plan will include a plan for providing a minimum of 18 hours annually for staff development related to high quality programming for eligible children based on a professional development needs assessment and including a minimum of six hours of education on inclusive environments.14.2. Professional development opportunities will follow the West Virginia State Training and Registry System (S.T.A.R.S.) training process (attached).14.3. Every early education teacher and aide must complete a total of 45 hours of training based upon the curriculum/assessment standards over a 24 month period and provided by the employer or made accessible through the county collaborative plan for professional development. These 45 hours of training will satisfy the 18 hours annual training requirement for the year in which the training is received and the two subsequent years. §126-28-15. Transportation.15.1. For programs participating in the county collaborative plan, transportation is considered a support, not a mandated service.15.2. Participating programs should coordinate transportation systems to support families whose children would not otherwise be able to participate.15.3. All participating programs must, at a minimum, follow the requirements of their

primary funding source or the West Virginia TransporTots document whichever is more stringent. §126-28-16. Program Oversight.16.1. Local program oversight, 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.16.2. The West Virginia Board of Education or its designee and the Secretary of the West Virginia Department of Health and Human Resources or his/her designee will maintain state oversight.16.3. On or before the second day of January, 2004, the Secretary of the West Virginia Department of Health and Human Resources and the West Virginia State Superintendent of Schools will submit a report to the Legislative Oversight Commission on Educational Accountability and the joint committee on government and finance which addresses, at a minimum:16.3.1. a summary of the approved county plans for providing the early childhood education programs under this policy.16.3.2. an analysis of the total cost to the state and counties of implementing the plans.16.3.3. a separate analysis of the impact of plans on counties with increased enrollment.16.3.4. an analysis of the affect of the programs on the maximization of the use of federal funds for early childhood programs.16.4 On or before the first day of December, 2004, and each year thereafter, the West Virginia State Board of Education shall report to the Legislative Oversight Commission on Educational Accountability. I agree with 18.618.6. WV Pre-k classrooms shall provide useable floor space of at least 35 square feet per child and available for children's activities, exclusive of halls, bathrooms, the kitchen, office space, or storage areas. Useable outdoor play space of 75 square feet per child shall be provided. 18.7. WV Pre-k classrooms shall limit classroom size to no more than twenty children per classroom. Ratios shall be maintained at 1 adult: 10 children with one adult being a certified teacher in accordance with §126-28-8, Personnel Standards. I agree with 18.8.8. 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 West Virginia Department of Education child and adult food program. Programs operating less than four hours will provide a snack as prescribed the West Virginia Department of Education child and adult food program. 18.9. WV Immunization. All children entering an approved participating WV Pre-k classroom that is participating in the county collaborative plan shall follow the guidelines of the primary (providing 51% or more of the funding that year) funding source regarding immunization. Participating programs that operate within a public school facility must follow West Virginia Code §16-3-4. 18.10. Health Screenings. All children entering an approved participating WV Pre-k classroom that is participating in the county collaborative plan shall screen children 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 West Virginia Code §18-5-17. 18.11. Program Evaluation.19.1. Beginning with the school year which starts in August 2004, all participating programs shall use the Early Childhood Environment Rating Scale (ECERS, Harms, Clifford, and Cryer, 1998) as a self-assessment tool to evaluate the programs success in meeting the needs of the children. This self-assessment will be submitted annually by the 30th day of June to the West Virginia Department of Education, Coordinator of Early Childhood, Building 6, Room 318, 1900 Kanawha Boulevard, East, Charleston, WV 25305-0330.19.2. Programs will be assessed using the ECERS by a trained outside evaluator every five years or if concerns from the West Virginia Department of Education, West Virginia Department of Health and Human Resources or county board warrant assessment.19.3. At which time the state has money and manpower to provide monitoring using the ECERS, programs may be required to have a trained outside evaluator evaluate the program more frequently.19.4. At which time a county has fully implemented their county collaborative plan and all eligible children in that county have access to a WV Pre-k classroom, the county board of education is required to annually submit a copy of the ECERS self-evaluation for each approved participating WV Pre-k program, a summary of the WV Pre-k services provided in the county, a collaborative agreement for each community partner providing services as an approved participating WV

Pre-k program provider, the total number of WV Pre-k children served in each 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 Early Childhood Coordinator of the West Virginia Department of Education, by the 30th day of June (format attached). A copy of the report must be sent by the 30th day of June to the West Virginia Department of Health and Human Resources, Early Childhood

Individual/Organization: Cheche F. Price, Head Start
Title: Business: Education and Training Manager

Cathy Jones

From: Irene Murphy [imurphy@access.k12.wv.us]

Sent: Thursday, November 21, 2002 8:55 AM

To: ctrjones@access.k12.wv.us

Subject: Policy 2525 Comments



COMMENTS/SUGGESTIONS
§126-28-1. General.
§126-28-2. Guidelines. Please change three consecutive days to the minimum number of hours served each week. Personnel who are not certified should not be paid a teacher's salary during the five years they have to become certified.
§126-28-3. Definitions.
§126-28-4. Parent/Guardian Involvement and Family Support.

§126-28-5. Attendance.

Let the county decide how many days and which days. You may want to include a minimum number of hours to be served each week.

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

§126-28-12. Transition and Continuity.

§126-28-13. Inclusive Environments.

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

§126-28-15. Transportation.

§126-28-16. Program Oversight.

§126-28-17. Financing.

§126-28-18. Health and Safety.

§126-28-19. Program Evaluation.

Please Mail the Completed Comment Form to:

Vicki Moss

From: Cathy Jones [ctrjones@access.k12.wv.us]
Sent: Tuesday, December 03, 2002 9:20 AM
To: Vicki Moss
Subject: FW: policy comments

Cathy R.Jones, Ed.D.
Coordinator Early Childhood/Even Start
Building 6, Room 318
1900 Kanawha Blvd.East
Charleston, WV 25305-0330
Phone 304-558-2691
Fax 304-558-6268
ctrjones@access.k12.wv.us

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

From: Cathy Stout [mailto:ccstout@citynet.net]
Sent: Wednesday, November 20, 2002 8:53 PM
To: ctrjones@access.k12.wv.us
Subject: policy comments

126-28-6 counties need more time to develop a truly collaborative, well developed plan. a lot of technical assistance and training will be needed, the contracting involved requires strong administrative involvement, counties do not traditionally have administrators in place who have knowledge of quality preschool education and a knowledge of community services

126-28-8 if people with two year degrees are not given permits to teach in other areas of education, standards should not be lowered for preschool education. allowing people with two year degrees to have full permits while they finish their education diminishes the importance of having knowledgeable, well educated teachers to implement quality programs. five years with an uncertified teacher is a long time and effects a lot of children

126-20-18 children with special needs should be weighted when determining staff ratios and the number of children per classroom

staff ratios and number of children per classroom should be different for three year olds
the wording in 18.10 is unclear to me. it reads as if the children will be conducting the screening as opposed to receiving it

Vicki Moss

From: Cathy Jones [ctrjones@access.k12.wv.us]
Sent: Tuesday, December 03, 2002 9:21 AM
To: Vicki Moss
Subject: FW: Comments on Policy 2525

=====
Cathy R. Jones, Ed.D.
Coordinator Early Childhood/Even Start
Building 6, Room 318
1900 Kanawha Blvd. East
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Phone 304-558-2691
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-----Original Message-----
From: Sandy Walsh [mailto:swalsh@access.k12.wv.us]
Sent: Tuesday, November 19, 2002 4:52 PM
To: ctrjones@access.k12.wv.us
Subject: Comments on Policy 2525

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization:

Reporting: Sandy Walsh

Title: Business:
Director of Federal Programs, Monongalia County Schools

Street Address:
1433 Dorsey Avenue

City/State/Zip:
Morgantown, WV 26501

COMMENTS/SUGGESTIONS

§126-28-1. General.

No comment

§126-28-2. Guidelines.

2.1.2. The term "scientific research" may be difficult to locate for young learners. I would prefer it to read, "utilize developmentally appropriate curriculum based on research about how children learn."

2.1.5. I would prefer the term "scientific reserch" be deleted and the policy read, "...based on research about how four-year-olds learn."

§126-28-3. Definitions.

3.7 I am glad to see minimum program guidelines for operation are given.

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

No comment.

§126-28-5. Attendance.

5.1 I support the voluntary nature of WV Pre-K.

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

6.4 I support the collaborative nature of the program and that 50% of the classrooms should be in the community. However, this may not be possible in some areas of the state.

§126-28-7. Waivers.

No comment.

§126-28-8. Personnel Standards.

No comment.

§126-28-9. Regulation of Facilities.

I recommend deleting the last sentence, "In the case of public schools, West Virginia Department of Health and Human Resources Child Care Licensing staff will conduct monitoring visits and any recommendations for action will be made to the Office of Education Performance Audits." Public schools have health and safety checks and monitoring by OEPA. They do not need a child care license. I do not see the necessity for this last sentence.

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

No comment.

§126-28-11. Curriculum and Assessment.

No comment.

§126-28-12. Transition and Continuity.

12.1.7 This allows parents the opportunity to enroll their child in a setting close to their work or child care setting which is positive.

§126-28-13. Inclusive Environments.

The inclusiveness of this policy will help to integrate funding which I fully support. I view this as one of the greatest benefits of the collaborative effort.

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

The hours of staff development set seems appropriate.

§126-28-15. Transportation.

I support the plan that transportation is considered a support, not a mandated service.

§126-28-16. Program Oversight.

No comment.

§126-28-17. Financing.

17.2 Money generated through the program should be used solely for the purpose of the Pre-k program.

§126-28-18. Health and Safety.

No comment.

§126-28-19. Program Evaluation.

No comment.

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
Office of Instructional Services
West Virginia Department of Education
Capitol Building 6, Room 318
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us

Fax No.: (304) 558-6268

West Virginia Department of Education
1900 Kanawha Boulevard East
Charleston, WV 25305

(Phone List by Topics) (Staff Phone and Email by Name)
(School Directory)

Vicki Moss

From: Cathy Jones [ctrjones@access.k12.wv.us]
Sent: Tuesday, December 03, 2002 9:22 AM
To: Vicki Moss
Subject: FW: Policy 2525

Cathy R. Jones, Ed.D.
 Coordinator Early Childhood/Even Start
 Building 6, Room 318
 1900 Kanawha Blvd. East
 Charleston, WV 25305-0330
 Phone 304-558-2691
 Fax 304-558-6268
 ctrjones@access.k12.wv.us

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

From: Terri Wontrobski [mailto:twontrob@access.k12.wv.us]
Sent: Tuesday, November 19, 2002 9:48 AM
To: cathy jones
Subject: Policy 2525

Dear Cathy:

Attached are my comments regarding Policy 2525. For the most part, I feel it is a very excellent policy. The partnerships with the Board of Education, Head Start, etc. are excellent. My comments are as follows:

#1: 126-28-4 Parent/Guardian Involvement and Family Support. Page 3: *I believe the section of this policy should be strengthened to include: requiring each county plan to address how they will work with each family in the areas of Literacy, Parenting, Employment, and Wellness so that parents/guardian skills can be strengthened as children transition into Kindergarten. The social service and parent involvement model for Head Start is very strong and is an excellent model to follow. These components are what make Head Start/pre-school so strong.*

#2: 126-28-6 Collaboration and County Plan. Page 4: 6.4: In order to support counties in the effort to maximize existing resources and collaborate with other providers of early childhood education, no less than 50% of the classrooms for eligible children must be provided through contracts 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 or cannot meet the mandates of this policy. This may not be construed to mean that counties will provide education services in public school settings only and contract out support services both rather than 50% of the classrooms for eligible children must be contracted with qualifying providers in community settings. The ratio of community to public school providers can only be decreased with the written permission of both the West Virginia Board of Education and the Secretary of the WV Department of Health and Human Resources. 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.

Head Start and Child Care have developed licensed classrooms set apart from the local public school district's Pre-School programs. I support that a minimum of 50% of the four year old classrooms be contracted to community programs, Head Start and Title I meeting the standards in this policy to provide the classroom space, qualified staff and financial resources to meet the goal. I feel that this policy also needs to be strengthened to

12/3/02

mandate that all counties collaborate or to require a mediator to help them work it out if the T/TA facilitators were not successful.

#3 - Page 6: 8.1 -- Teachers must hold a qualifying certification/endorsement for teachers, specifically, early education, Prek-k endorsement, or birth to five.

8.3 -- I strongly support sections 8.2 through 8.3 for qualifications and the full-time permit to assure qualifying certification/endorsement of personnel. However, I feel that it needs to be strengthened by saying the permit can only be issued if no qualified teachers are available. First priority must be given to certified teachers, then permit teachers can be considered.

#4: 126-28-9, Regulation of Facilities and 126-20-18 Health and Safety:

Page 7-9.1: All approved participating WV Pre-k programs, see definitions, that are included in the county collaboration plan must meet the requirements as set forth in the rule promulgated to replace and/or update 64CSR21. Public schools or other programs who are exempt under West Virginia Division of Health Legislative Rules Child Care enters 64CSR21 or its replacement must meet the requirements et for in that rule. In the case of public schools, West Virginia Department of Health and Human Resources Child Care Licensing staff will conduct monitoring and any recommendations for action made to the Office of Education Performance Audits.

Licensing mandate for school board should be emphasized so that school systems understand that they must meet licensing requirements.

Thanks for your consideration and all your hard work.

Terri Wontrobski

Cathy Jones

From: Terri Wontrobowski [twontrob@access.k12.wv.us]

Sent: Tuesday, November 19, 2002 9:48 AM

To: cathy jones

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Licensing mandate for school board should be emphasized so that school systems understand that they must meet licensing requirements.

Thanks for your consideration and all your hard work.

Terri Wontrobski

Cathy Jones

From: Pastor Scott Mapes [ravenaz@citynet.net]

Sent: Saturday, November 16, 2002 9:38 AM

To: ctrjones@access.k12.wv.us

Subject: Regarding Policy 2525

from: Rev. Scott Mapes
Senior Pastor
Ravenswood Church of the Nazarene
1108 Gallatin Street
Ravenswood, WV 26164

Please note: I am also secretary of the Day Care Board for Good Shepherd Family Day Care, a ministry of our church.

Following are comments/suggestions on revised Policy 2525, related to WV's Universal Access to Pre-kindergarten System.

General - It will be helpful to make it clear that this policy provides a universal pre-K program, not that it is mandating that all four-year-olds are required to attend a pre-K program. This point of confusion has created some opposition to the plan, from my vantage point.

Curriculum and assessment - Under paragraph 126-28-11.4.1.a, I am concerned that one particular plan of action not be forced upon participating programs, based on any one biased view of developmental psychology. There are points at which there may be some disagreement--such as the role of religious education in the preschool years--and freedom and flexibility should be given to participating programs and the families of the children affected.

Thank you for this opportunity to comment on the revised policy.

Scott Mapes

Policy 2525

Individual/Organization:

Kelli Whytsell

Title: Business

Preschool Teacher

Pleasant Hill School

Street Address:

H.C. 68 Box 2

Grantsville W.V. 26147

Comments/Suggestions

126-28-1. General

2.1.7 School System should employ professionals who are teachers with a specialization in early childhood.

2.1.11 Class size should be 5:1 when working with young children especially ones that are not yet toilet trained. There is a big difference between preschool and kindergarten age students.

126-28-2. Guidelines.

126-28.3 Definitions

3.7 Rural counties can not offer half-day classes because of transportation problems. Preschool classes should be on alternating days if the students are going all day. For example Monday/Wednesday/Friday. This allows young children to rest on days not in school. We need to look at not only the long school day but also the length of time the students are on the school bus.

This could also be changed to reflect the number hours a student is in school, instead of attending consecutive days.

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

126-28-5. 4.1.2. Home visits are necessary when working with young children. This helps establish an early home/school relationship.

The preschool teachers need time in their schedule to allow for working with families in their home.

4.1.5 Integrated preschool classroom with certified professionals and paraprofessionals working with young children.

126-28-6. Attendance.

126-28-7. Collaboration and the County Plan

6.4 Small counties do not have the resources and personnel to have 50% community programs. Our county currently shares students with day care and head start. Policy makers need to look at what individual counties currently have and see if that meets the needs of the students in their county.

6.5 The state has trained Tadpole members in each county; this should be developed in to the collaborative planning team. The state needs to provide funding, time and resources to expand these meetings.

126-28-8 Personnel Standards

8.1 Current teaching certifications to include specialization in early childhood endorsement.

8.2.2 All professionals working with preschool students employed by a County Board of education should be required to meet the same teaching standards as teachers working with other students in the school system.

8.3 Persons employed to meet staff/child ratios such as aids; paraprofessionals should be paraprofessionals as outlined in the WV school law 18A-4-8 paraprofessional 18A-3-2a

126-28-14 Staff Development

14.3 45 hours of training should be decided by the county collaborative planning team or Tadpole. Teachers employed by the local board of

education should not be required to do additional 18 hours of staff development to meet county staff development plans.

126-28-17 Financing

To implement a quality preschool program and to sustain this program adequate funding must be in place. Quality preschool program uses a lot of consumable materials, crayons, construction paper, paint, play-doh, glue, sand. These materials need to be replaced yearly. Also age appropriate playground materials and equipment needs to be provided.

A quality preschool program should provide field trips to reinforce learning opportunities, to the library, fire station, doctor office or a farm. Funding needs to be provided for these educational opportunities. The funding needs to be in place every year not just the first.

126-28-19 Program Evaluation

Many counties currently use the Battelle Developmental Inventory (BDI) as their assessment tool. The counties have purchased test booklets, computerized scoring, testing materials and provided teacher training to administer the tests. The counties should be allowed to continue to use this assessment.

In an Integrated preschool program that has students with IEP's and norming peers. This type of program is monitored by the Department of Special Education. This should be continued and enough monitoring to satisfy this policy.

19.4 The state should survey or require a report from each county to see what preschool program currently exist in their county. Look at what exist now and see if they are meeting the needs of the preschool students and their families. One plan will not work for all counties. Especially when working with young children and their families.

Programs need to be flexible and reflect the needs of the children you are working with not the needs of the policy makers.

Preschool children with special needs such as communication, fine and gross motor, developmental delays need to be in the same classroom as other preschool children. Preschool children learn from each other and through modeling and play. Classes need to be small so that individual attention and needs can be addressed.

If West Virginia is going to implement a Pre-Kindergarten policy then we need to be a leader and have a high quality child focused program.

Cathy Jones

From: Teresa Lawlor [tlawlor@wvdhhr.org]
Sent: Tuesday, November 19, 2002 9:34 AM
To: ctrjones@access.k12.wv.us
Subject: Comments on Policy 2525

Overall I think the policy is good. There are a few comments on specific issues that are listed below.

5 Attendance

There is concern regarding how much control a parent would have in removing a child from a program when the program administrator and teacher do not agree with the parent. Could the parent and child face the same penalties for truancy as those in regular school now?

6.4 I agree with this section to maximize existing resources and collaborate by utilizing more that 50% of the classrooms provided through contracts.

7 Waivers

I agree with this section

8 Personnel Standards

I agree with this section

9 Regulation of Facilities

I am glad this section mandates the requirements for licensing. There is a concern regarding the consistency of enforcement. Once recommendations are made to the Office of Education Performance Audits there is no control from there to the action taken. We would hope it would be consistent with the action DHHR would take regarding a privately licensed child care center.

Vicki Moss

From: Cathy Jones [ctrjones@access.k12.wv.us]
Sent: Tuesday, December 03, 2002 9:22 AM
To: Vicki Moss
Subject: FW: COMMENTS TOWARD POLICY 2525 THANK YOU FOR THE OPPORTUNITY

=====
Cathy R.Jones, Ed.D.
Coordinator Early Childhood/Even Start
Building 6, Room 318
1900 Kanawha Blvd.East
Charleston, WV 25305-0330
Phone 304-558-2691
Fax 304-558-6268
ctrjones@access.k12.wv.us

-----Original Message-----
From: Marlene Midget [mailto:mmidget@npheadstart.org]
Sent: Tuesday, November 19, 2002 1:09 PM
To: ctrjones@access.k12.wv.us
Subject: COMMENTS TOWARD POLICY 2525 THANK YOU FOR THE OPPORTUNITY

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Marlene Midget - Northern Panhandle Head Start Inc.

Title: Program Operations Manager Business: Federally Funded Head Start
Infant/Toddler and Preschool Program

Street Address: 51 16th Street 4th Floor
City/State/Zip: Wheeling, WV 26003

COMMENTS/SUGGESTIONS

\$126-28-1. General. I support Policy 25/25. This is long overdue for our children in West Virginia.

\$126-28-2. Guidelines.

\$126-28-3. Definitions.

\$126-28-4. Parent/Guardian Involvement and Family Support. This section needs to be stronger to ensure all families receive the support they need to attain their goals. This section is also vital to the success of our children in school. Each county plan must have a strong parent involvement system, that recognizes parent as the primary teacher of their children and services that support self-sufficiency.

\$126-28-5. Attendance. Attendance must be at least three consecutive days a week and at no less than three and one-half hours each day for our children to attain the benefits of the Pre-K program.

\$126-28-6. Collaboration and the County Plan. I support the 50% of the four year old classrooms being contracted in the community programs and they also must meet all the standards.

\$126-28-7. Waivers.

\$126-28-8. Personnel Standards. I support the 8.2-8.3 for qualification

and the full time permit for qualifying personnel

§126-28-9. Regulation of Facilities. I support requiring all programs serving four year children in a Pre_K setting have to meet the WV department of Health & Human Resources Child- Care licensing Regulations.

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

§126-28-11. Curriculum and Assessment. The curriculum and assessment must be age and developmentally appropriate and not a watered down kindergarten or 1ST grade.

§126-28-12. Transition and Continuity.

§126-28-13. Inclusive Environments.

§126-28-14. Staff Development and Training. Excellent system for training staff and encouraging staff to improve their education.

§126-28-15. Transportation. WV Pre- K must provide transportation to all four year olds. Failure to do so would exclude the neediest of our children from attaining their education.

§126-28-16. Program Oversight.

§126-28-17. Financing. I support this section as it is written.

§126-28-18. Health and Safety. All children must have immunizations and screenings according to the set standards of the funding source.

§126-28-19. Program Evaluation. The ECERS evaluation should be implemented every three years, to be effective and timely to monitor progress in the four year old programs.

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start

Office of Instructional Services

West Virginia Department of Education

Capitol Building 6, Room 318

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us

Fax No.: (304) 558-6268

Vicki Moss

From: Cathy Jones [ctrjones@access.k12.wv.us]
Sent: Tuesday, December 03, 2002 9:19 AM
To: Vicki Moss
Subject: FW: Comment 2525

Cathy R.Jones, Ed.D.
Coordinator Early Childhood/Even Start
Building 6, Room 318
1900 Kanawha Blvd.East
Charleston, WV 25305-0330
Phone 304-558-2691
Fax 304-558-6268
ctrjones@access.k12.wv.us

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

From: Cynthia Parker [mailto:cparker@access.k12.wv.us]
Sent: Friday, November 22, 2002 2:15 PM
To: ctrjones@access.k12.wv.us
Subject: Comment 2525

Comments on Board Policy 2525 Universal Access to Prekindergarten.

The policy seems to allow less qualified/certified instructors than regular public education in a time when "No Child Left Behind" is calling for more highly qualified personnel. In order to better prepare our children for their formal education, we should have the MOST qualified teachers and aids.

Our county has been working very hard to integrate preschool in to our existing schools with full collaboration with Headstart. It does not seem appropriate for us to have to dismantle these in order to have 50% in the community.

Can WV Board Policy really govern outside agencies? What real authority will local school systems have in monitoring the preschool sites not located within schools?

Cynthia Parker
Lewis County Schools, Title I Coordinator

Vicki Moss

From: Cathy Jones [ctrjones@access.k12.wv.us]
Sent: Tuesday, December 03, 2002 9:24 AM
To: Vicki Moss
Subject: FW: Policy 2525

Cathy R.Jones, Ed.D.
Coordinator Early Childhood/Even Start
Building 6, Room 318
1900 Kanawha Blvd.East
Charleston, WV 25305-0330
Phone 304-558-2691
Fax 304-558-6268
ctrjones@access.k12.wv.us

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

From: Gym1stars@aol.com [mailto:Gym1stars@aol.com]
Sent: Tuesday, November 05, 2002 10:33 AM
To: ctrjones@access.k12.wv.us
Subject: Policy 2525

Comments/Suggestions regarding revised Policy 2525

Tim
Fairmont, WV

126-28-15. Transportation

It would be a shame to not to make transportation services mandatory. As a tax paying citizen as well as a child advocate this service is vital for families. To truly service **all** the children this service must be included. It is not fair to the families that do not qualify for Head Start nor has a child that qualifies for preschool special needs no transportation!

126-28-11. Curriculum and Assessment

Vary little is said about playground. Many playgrounds are funded by the PTO's. Most playgrounds are not designed to meet the preschool children needs---who will be left to pick up the cost.

Vicki Moss

From: Cathy Jones [ctrjones@access.k12.wv.us]
Sent: Tuesday, December 03, 2002 9:22 AM
To: Vicki Moss
Subject: FW: COMMENTS TOWARD POLICY 2525....THANK YOU FOR THE OPPORTUNITY

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Coordinator Early Childhood/Even Start
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1900 Kanawha Blvd. East
Charleston, WV 25305-0330
Phone 304-558-2691
Fax 304-558-6268
ctrjones@access.k12.wv.us

-----Original Message-----
From: Cher McKeever [mailto:cmckeeper@npheadstart.org]
Sent: Tuesday, November 19, 2002 2:24 PM
To: ctrjones@access.k12.wv.us
Subject: COMMENTS TOWARD POLICY 2525....THANK YOU FOR THE OPPORTUNITY

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Cher McKeever - Northern Panhandle Head Start Inc.

Title: Administrative Assistant Business: Federally Funded Head Start
Infant/Toddler and Preschool Program

Street Address: 51 16th Street, 4th Floor

City/State/Zip: Wheeling, WV 26003

COMMENTS/SUGGESTIONS

§126-28-1. General.
§126-28-2. Guidelines.
§126-28-3. Definitions. 3.7 Minimum program availability. I believe that, at a minimum, a 4 yr old pre-kindergarten classroom should operate for 3 consecutive days a week and for no less less than 3 ½ hours each day during the school year calendar.
§126-28-4. Parent/Guardian Involvement and Family Support.
§126-28-5. Attendance.
§126-28-6. Collaboration and the County Plan. 6.4 no less than 50% of the classrooms for eligible children must be provided through contracts with community programs. I believe that allowing this provision provides for maximization of federal funds including other state resources through child care subsidies according to meet the individual needs of families and their desire to select a high quality early childhood education program for their 4 year old child. Many partnerships exist in communities across WV that are extremely successful for everyone involved! A collaborative effort of this nature will also bring a great deal of expertise from a cross section of the education arena (not to mention strengthen the system), together, to meet the educational needs of our young children. I believe that the

- collaborative plan must include a fair and equitable enrollment form and ensure that federal funds are maximized without jeopardizing the volunteer enrollment and without regard to segregation based on socioeconomic
- §126-28-7. Waivers.
- §126-28-8. Personnel Standards. 8.1-8.3 Personnel Standards. Allowing the provision for teaching staff that will become part of a collaborative classroom to attain the qualifying certification required by the WV Board of Education should be perceived as a win-win! The expectations that a preschool program delivers a high quality learning experience for 4 yr olds begins with the qualifications and experience of the teaching staff (not to mention their enthusiasm and love for children).
- §126-28-9. Regulation of Facilities. Ensuring that the participating programs meet the requirements of the WV Child Care Licensing law is a positive step for safe and healthy environments for children and their families. Allocating the child care specialist as a resource to monitor the public schools and recommendations for action provided to the OEPA is commendable.
- §126-28-10. Standards for Preparing Students.
- §126-28-11. Curriculum and Assessment. Inclusion of parents as collaborative partners in planning and outcomes for children is vital to the parents' understanding of the individual needs of their child. Creating a positive, learning environment conducive to meet the developmental needs of each child is important and necessary for a successful pre-k experience. In addition, linking parents and teachers together invites open communication and the potential for involving parents in their child's learning experience on a more one-on-one basis.
- §126-28-12. Transition and Continuity.
- §126-28-13. Inclusive Environments.
- §126-28-14. Staff Development and Training.
- §126-28-15. Transportation. It may be an option if the funding source provides such a resource to families, but an increased number of families will utilize the service if transportation is provided.
- §126-28-16. Program Oversight.
- §126-28-17. Financing. 17.2 Money generated will be used to support the participating programs.....This will assist in the process that funds secured through the funding formula actually comes back to those contractual community programs and county school system provided programs rather than utilized in other areas of public education in the county. Adequately funding this pre-k system should be fair and equitable and the funds generated from the same should remain within the pre-k system.
- §126-28-18. Health and Safety. Ensuring that the highest regard to the most stringent safety standards/requirements are met by each participating program is critical. Every child deserves a safe and healthy environment in which to learn and grow developmentally, emotionally and physically.
- §126-28-19. Program Evaluation. Ensuring that an annual self-assessment is completed can only be a "positive" for this new system. Using one document for each participating program assesses them from the one perspective. This system should encourage growth for those program who previously did not conduct annual self-assessments.

Please Mail the Completed Comment Form to:
 Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start
 Office of Instructional Services
 West Virginia Department of Education
 Capitol Building 6, Room 318
 1900 Kanawha Boulevard, East
 Charleston, West Virginia 25305-0330
 E-Mail Address: ctrjones@access.k12.wv.us
 Fax No.: (304) 558-6268

Cher A. McKeever
 Northern Panhandle Head Start Inc.
 304-233-3290

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: PIECES Professional Development Committee

Title: State Level Committee

**Street Address: ATTN:Co-Chair, Judy Curry
WVDHHR
350 Capitol Street, Room 691**

City/State/Zip: Charleston, WV 25301

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.

8.2 The Personnel Committee strongly endorses the language in section 8.2 which allows for permits to be issued for a period of five years and encourages

the Department to keep this section as written.

8.3 The Committee would like to add to the language in 8.3. Based on the five year period given in section 8.2, the committee recommends that aides and assistants be given a period of five years to progress from level 2 to level 5 of the STARS career pathway.

§126-28-9. Regulation of Facilities.

9.1 The committee is concerned that the present language does not provide a process for private pre-schools that are not licensed to demonstrate compliance with licensing requirements. We would like to recommend that private preschools that are exempt from licensing that wish to participate in the WV Pre-k program be monitored by licensing specialists and any non-compliance issues be reported to the collaborative county team.

§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. Transportation.

§126-28-16. Program Oversight.

§126-28-17. Financing.

§126-28-18. Health and Safety.

§126-28-19. Program Evaluation.

Please Mail the Completed Comment Form to:

Cathy R. Jones, Ed.D. Coordinator Early Childhood/Even Start

Office of Instructional Services

West Virginia Department of Education

Capitol Building 6, Room 318

1900 Kanawha Boulevard, East

Charleston, West Virginia 25305-0330

E-Mail Address: ctrjones@access.k12.wv.us

Fax No.: (304) 558-6268

West Virginia Department of Education

1900 Kanawha Boulevard East

Charleston, WV 25305

(Phone List by Topics) (Staff Phone and Email by Name) (School Directory)

For suggestions, questions, problems

Vicki Moss

From: Cathy Jones [ctrjones@access.k12.wv.us]
Sent: Tuesday, December 03, 2002 9:22 AM
To: Vicki Moss
Subject: FW: POLICY 2525: WEST VIRGINIA'S UNIVERSAL ACCESS TO PRE-KINDERGARTEN SYSTEM

=====
Cathy R. Jones, Ed.D.
Coordinator Early Childhood/Even Start
Building 6, Room 318
1900 Kanawha Blvd. East
Charleston, WV 25305-0330
Phone 304-558-2691
Fax 304-558-6268
ctrjones@access.k12.wv.us

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

From: Cathy Williams [mailto:cwilliams@npheadstart.org]
Sent: Tuesday, November 19, 2002 4:00 PM
To: ctrjones@access.k12.wv.us
Subject: POLICY 2525: WEST VIRGINIA'S UNIVERSAL ACCESS TO PRE-KINDERGARTEN SYSTEM

POLICY 2525: West Virginia's Universal Access to Pre-kindergarten System

COMMENT PERIOD ENDS: November 20, 2002

Directions: Please use this form to provide comments/suggestions regarding revised Policy 2525.

Individual/Organization: Cathy Williams - Northern Panhandle Head Start Inc.

Title: Fiscal Manager Business: Federally Funded Head Start
Infant/Toddler and Preschool Program

Street Address: 51 16th Street, 4th Floor

City/State/Zip: Wheeling, WV 26003

COMMENTS/SUGGESTIONS

\$126-28-1. General.

\$126-28-2. Guidelines.

\$126-28-3. Definitions. 3.7 Minimum program availability. I believe that, at a minimum, a 4 yr old pre-kindergarten classroom should operate for 3 consecutive days a week and for no less less than 3 ½ hours each day during the school year calendar.

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

\$126-28-5. Attendance.

\$126-28-6. Collaboration and the County Plan. 6.4 no less than 50% of the classrooms for eligible children must be provided through contracts with community programs. I believe that allowing this provision provides for maximization of federal funds including other state resources through child care subsidies according to meet the individual needs of families and their desire to select a high quality early childhood education program for their 4 year old child. Many partnerships exist in communities across WV that are extremely successful for everyone involved! A collaborative effort of this nature will also bring a great deal of expertise from a cross section of the education arena (not to mention strengthen the system), together, to meet

the educational needs of our young children. I believe that the collaborative plan must include a fair and equitable enrollment form and ensure that federal funds are maximized without jeopardizing the volunteer enrollment and without regard to segregation based on socioeconomic

§126-28-7. Waivers.

§126-28-8. Personnel Standards. 8.1-8.3 Personnel Standards. Allowing the provision for teaching staff that will become part of a collaborative classroom to attain the qualifying certification required by the WV Board of Education should be perceived as a win-win! The expectations that a preschool program delivers a high quality learning experience for 4 yr olds begins with the qualifications and experience of the teaching staff (not to mention their enthusiasm and love for children).

§126-28-9. Regulation of Facilities. Ensuring that the participating programs meet the requirements of the WV Child Care Licensing law is a positive step for safe and healthy environments for children and their families. Allocating the child care specialist as a resource to monitor the public schools and recommendations for action provided to the OEPA is commendable.

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

§126-28-11. Curriculum and Assessment. Inclusion of parents as collaborative partners in planning and outcomes for children is vital to the parents' understanding of the individual needs of their child. Creating a positive, learning environment conducive to meet the developmental needs of each child is important and necessary for a successful pre-k experience. In addition, linking parents and teachers together invites open communication and the potential for involving parents in their child's learning experience on a more one-on-one basis.

§126-28-12. Transition and Continuity.

§126-28-13. Inclusive Environments.

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

§126-28-15. Transportation. It may be an option if the funding source provides such a resource to families, but an increased number of families will utilize the service if transportation is provided.

§126-28-16. Program Oversight.

§126-28-17. Financing. 17.2 Money generated will be used to support the participating programs.....This will assist in the process that funds secured through the funding formula actually comes back to those contractual community programs and county school system provided programs rather than utilized in other areas of public education in the county. Adequately funding this pre-k system should be fair and equitable and the funds generated from the same should remain within the pre-k system.

§126-28-18. Health and Safety. Ensuring that the highest regard to the most stringent safety standards/requirements are met by each participating program is critical. Every child deserves a safe and healthy environment in which to learn and grow developmentally, emotionally and physically.

§126-28-19. Program Evaluation. Ensuring that an annual self-assessment is completed can only be a "positive" for this new system. Using one document for each participating program assesses them from the one perspective. This system should encourage growth for those program who previously did not conduct annual self-assessments.

Please Mail the Completed Comment Form to:

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Cathy Williams

Northern Panhandle Head Start Inc.

304-233-3290

Cathy Jones

From: Kenneth Dean [kdean@ncwvcaa.org]
Sent: Wednesday, November 20, 2002 11:02 AM
To: Ctrjones
Cc: Ruth Anne Ponzurick; WVCADA - Dave Treharne
Subject: Comments on Policy 2525

Dear Cathy

I would like to personally applaud the efforts of "the Team" in your development of a comprehensive Policy.

While I will not endeavor to make reference to specific Policy sections, there are a few areas about which I have serious concern and other concerns where no policy definition exists. They are as follows:

1) Within a rural state as is WV, transportation is a vital element of service success. While I am not sure it should be a mandated service element, I am sure that those of a lesser economic status will suffer more greatly from the lack of transportation supports. There is evidence within the Policy that cogent thought has been given about the blending of classrooms with all socio-economic groups. I fear that, where there is a lack of transportation supports, classrooms will exhibit a more homogeneous nature of socio-economic grouping. Therefore, I believe that the Policy should address the transportation service issue even more strongly.

2) There has been discussion that the 50% (community service) provision issue is under challenge. I--STRONGLY--recommend that this provision remain intact! While I do understand the concerns of "school systems" where there is presently a dearth of community and private providers, the present Policy "waiver allowability" provision does offer opportunity for local flexibility of service design. Furthermore, certain local designs for the service to 4 year old children might serve to stimulate additional private business development. It is my opinion that this potential not be thwarted by amending the "rule" of "a minimum of 50%".

3) The monitoring of collaborative classrooms has proven to be a serious obstacle within some previous and even a few present collaborative efforts. I contend to you that Head Starts are required to regularly monitor their classrooms and other service venues in order to approach compliance with the "Performance Standards". An agreed upon monitoring process is paramount to potential success of the local collaborative. A clearly defined monitoring/reporting process and procedure must be part of the local collaborative agreements and should be a requirement of the "Policy".

4) There is no reference to "conflict resolution" within the "Policy". I report to you that the best of these collaborations will NOT be absent of conflict. I strongly urge that there be established some formal process for resolution of conflict. Facing problems is a daily activity. How we resolve those problems, more often than not, shapes our future. Conflict resolution procedures ought to be given its "due diligence"!!!

Thanks to the State Board of Education and to DHHR for allowing comment and suggestion!

Kenny Dean

Kenneth F. Dean
Executive Director
N.C.W.V.C.A.A.

Outgoing mail is certified Virus Free.

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Version: 6.0.413 / Virus Database: 232 - Release Date: 11/6/2002