



To: Vermont Act 76 Implementation Committee
From: The Vermont Council of Special Education Administrators (VCSEA)
Date: November 9, 2023
Re: Act 76 - Vermont's Universal PreKindergarten for 4-year-olds

The following comments are being submitted on behalf of the Vermont Council of Special Education Administrators (VCSEA). VCSEA is an organization dedicated to providing **leadership for the education of all children with a specific focus on students with disabilities.**

VCSEA offers the following input to the Act 76 Implementation Committee for consideration:

- VCSEA strongly recommends that the Vermont Agency of Education be the agency that provides oversight to public school programs, and that the Agency of Human Services continue to provide oversight to private PreK programs. This change will reduce the amount of paperwork and time for school personnel.
- Educating a 4-year-old costs more than a Kindergarten student. The reasons for this include staffing ratios and the level of student independence. The weighting formula will need to be adjusted to account for this increase in District budgets.
- Full-time programming is being defined as 35 hours per week in the Act. VCSEA believes there needs to be flexibility in options provided for 4-year-olds based on the child's needs, including part-time options. It will be important that school districts are able to access funding for part-time students. We recommend that "full-time" be defined by the LEA.
- Clarity around transportation is needed. Will school districts be required to provide transportation to 4-year-olds? How will the requirement of car seats/booster seats be applied to school buses? Requiring transportation and seat belt use will result in additional costs to local districts in FY26. This must be considered as Act 176 is set to be implemented in FY25 school year which in itself will impact many district budgets for 5 years. In order to ensure appropriate safety and supervision, additional support staff will be needed on transportation runs.
- A statewide contract with a standard rate for private PreK partners that includes requiring licensed teachers to educate students vs. simply being on-site. Further, including a requirement for private PreK partners to implement the Vermont Early Learning Standards is critical so that all of Vermont's children enter Kindergarten with a strong foundation.
- VCSEA believes that the biggest obstacle to full implementation of Act 76 boils down to space and current staffing shortages within our public schools. Many Vermont schools do not have the necessary space to accommodate 4-year-olds; therefore state funding would be needed to make the necessary infrastructure changes. Staffing shortages in special education are a very real concern. Many Districts have unfilled positions or have teachers on provisional licenses. Under Act 166, the decision to provide special education services outside the District boundary lies with the LEA. We recommend that this language remain to address the staffing concerns.