



Submitted via email
December 17, 2020

Bethany Patten, Illinois Governor's Office of Early Childhood Development
Re: Comments on Illinois Commission on Equitable Early Childhood Education & Care Funding Final Report Outline Draft

Dear Bethany,

On behalf of Start Early (formerly the Ounce of Prevention Fund), I have appreciated the opportunity to serve on the Illinois Commission on Equitable Early Childhood Education & Care Funding [the Commission] and this opportunity to offer feedback on the draft outline for the final report. Our comments aim to answer two of the questions posed to Commissioners during the December meeting:

- What content specific changes or additions do you recommend, and why?
- What do you envision a final, written report to include that you do not see in the outline?

We have also noted a few specific sections we believe to be very strong. Please let us know if you have thoughts, questions, or concerns.

Sincerely,

Kristin Bernhard
SVP, Advocacy & Policy

1. Background & Opportunity for Commission on Equitable Early Childhood Education and Care Funding

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| 1.a.iii | 0-3 commitment | We strongly support the statements in this section, particularly the spotlight on the state's longstanding commitment to infant/toddler programs and the mixed-delivery system. If this commitment to funding programs for infants and toddlers can be strengthened, please do. A reference to the PN3 agenda would be good to include. |
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3. Recommendation: Utilize this Commission's articulated, long-term funding goal in policymaking

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| 3.c | Future funding (B-3) | As our state's <u>PN3 agenda</u> makes clear, the first three years of life are the most rapid and critical period of development in the entire human lifespan and provide the greatest opportunity to set |
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| | | <p>the foundation for healthy development and learning. The experiences that children have during their earliest years shape their brains in a profound and significant way that sets them up for lifelong success or lifelong challenges. In order to ensure that all children reach their full potential, families must be supported in their communities by programs and policies that prioritize this critical and special window of opportunity.</p> <p>Fortunately, Illinois' families have a bold champion in Governor Pritzker. Now is the time to build on the great progress Illinois has made in providing a comprehensive approach to supporting children under three and be truly audacious in setting a vision and course of action to realize Governor Pritzker's goal of making Illinois the best state in the nation for families to raise young children.</p> <p>We believe early childhood education investments have increased in Illinois in part because the expansion of the ECBG has been linked (informally) to growth in funding for the K-12 education budget. Similarly, the education funding for programs supporting infants and toddlers has increased significantly because it is set in state law at a percentage of the overall preschool investment. This means, as you know, home visiting appropriations in the ISBE budget have grown dramatically while IDHS-funded home visiting has stagnated for nearly two decades. We cannot predict whether centralized administration would impact positively or negatively the long-term trajectory of infant/toddler appropriations, but we would argue that the State must dedicate a significant portion of all early care and education funding to support programs for infants and toddlers and their families, starting prenatally. To do it, the state should establish some sort of formal mechanism, to be codified into state law, that would direct to prenatal-3 services a proportionate share of early care and education funds, undertake a review of the appropriate percentage of funds that should be directed to 0-3, based on data about disparities in access to quality infant toddlers services across the system, and minimally be no less than the share of funding those programs receive currently or are provided through current law. This legal safeguard will help the state grow and focus resources to address issues of access to both home visiting and high-quality infant/toddler care. Even if we cannot decide on how best to invest in B-3 programs moving forward, it was a big topic of conversation at the workgroup level and the outline should include something to indicate that it will continue to be a priority of the state.</p> |
| 3.c | Future funding | Built into state statute for the K-12 funding formula distribution system is the "Minimum Funding Level," which is intended to |

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| | (statutory guarantees) | establish a target for State funding that will keep pace with inflation and continue to advance equity through the Evidence-Based Funding formula. If that minimum funding level is not appropriated by the Illinois General Assembly, state law lays out a plan for how new dollars invested into the system should be spent. A similar mechanism should be considered for the early care and education system. |
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4. Recommendation: Centralize and coordinate Illinois' ECEC funding system.

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| 4.c.ii | Direct distribution to service providers or to local or regional support entities | <p>We agree with the draft report that our new system (page 3) will require “unified professional and workforce development, unified quality improvement supports, including mental health consultation, and one authority for providers, implementing a coherent monitoring system.” We also agree that to do all of this well, the State should include in its cost estimate (page 5) the state infrastructure necessary to support the report recommendations and to support the cost of growing the system to meet the recommendations. We would like to see more explicit references to the significant role private intermediaries play in our current system and the role they will play in the future system. The draft suggests that money will flow to service providers or (still somewhat ill-defined) local or regional support entities to cover things like professional development, training and technical assistance, and community systems development.</p> <p>It is our belief that many of these functions, particularly in home visiting, are functions best conducted at the state level by the State and its private partners. (These sentiments are echoed some by the report on page 9, in fairness.) But if there are ways to be clearer about what the Commission expects of locals/regional entities and what it expects the state to do, that would strengthen the outline.</p> |
| 4.c.ii.4 | Community Systems Development | The Commission’s work will not succeed unless we decide how to fund adequately and support the development and maintenance of high-quality early childhood community collaboration. There is scant attention paid to community collaborations in the outline. Effective community systems development is a linchpin for equity in our system and should be highlighted more strongly. |

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| | | <p>The report should include the framework for local collaboration to be funded statewide to execute critical functions including: 1) informing how state funding should be distributed equitably; 2) supporting provider capacity to provide high quality services; 3) supporting full enrollment in funded programs; 4) organizing collaborating functions across the early childhood and other child serving systems. The funding for fully functioning local entities should be included in the cost modeling and into the overall adequacy of funding number.</p> |
| 4.j | EI, ECSE | <p>We appreciate the recognition (page 8) that to centralize and coordinate the system effectively, the state must support access to EI and ECSE across all early childhood settings and that the outline includes several places where further study is needed to do just that. It is our belief that improving services for children under five with disabilities or developmental delays is foundational to the Commission’s goal of creating a system whereby all children have equitable access to high-quality early learning and care. Put another way, the work of the Inclusion committee was to make sure the Commission considers the impact every recommendation will have on these kids. It is not a separate exercise; establishing a precise cost model for the state will only be accomplished if it includes an accurate cost model for EI and ECSE in all settings.</p> <p>Completing this work should be among the Commission’s highest priorities, and if not complete upon finalization of this report, it should include very specific plans and timelines for completion. At a minimum, the recommendations of the Inclusion Subcommittee and the cost-modeling that has been completed should be more fully explained in the report. For example, the cost modeling for community based programs completed by the Governor’s office had included costs for community based programs to better support children with disabilities and collaborate with school districts and EI providers to deliver services within their settings. We also learned that ECSE may not be able to be moved from the SEA, and that could be included and any implications of that should be addressed prior to completion of the report by the governance workgroup. When we say that the ECSE funding formula currently housed in the K-12 EBF should be reviewed, we should more clearly state why and what factors should be considered for LEAs in establishing and new formula: LEAs need funding to support children with IEPs and Section 504 plans in their schools and also to support children with disabilities and delays in community based organizations. We should include the models for that service delivery that were discussed in the workgroup and in the cost-modeling done previously so that work does not have to be recreated.</p> |

5. Recommendation: Centralize Illinois' ECEC systems into one state agency.

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| 5.c.iii | Equity | <p>We're heartened to see so much emphasis being paid to equity in the Commission's recommendations. The outline suggests intentional focus on racial and ethnic disparities, income disparities, language, culture, geography, and age. We agree. But equal attention must be paid to children with disabilities or developmental delays. This goes part and parcel with our urging to make sure EI and ECSE remain central in all Funding Commission conversations, reports, and timelines. Further, the report must also address a plan and timeline to determine how services for English Learners will be delivered. Similar to the work that needs to be done on EI and ECSE, this work is foundational to building an equitable system.</p> |
| 5.d.iii | Home visiting leadership in consolidated agency | <p>Leadership of the major home visiting funders has supported the growth of a strong network of statewide providers over the course of many years. State agencies, the Governor's Office of Early Childhood Development (GOECD), and the Home Visiting Task Force (HVTF) have all worked to coordinate certain government functions and activities, with some success. The HVTF, a standing committee of the Early Learning Council, plays a crucial role in these efforts, providing guidance, strategic vision, and significant staff support to the GOECD. In particular, the Executive Committee of the HVTF for years has been the coordinating body at which all major funders collaborate, share information, and make decisions about the entire system.</p> <p>Even with this collaboration across the major funding streams, the home visiting system lacks the governance structure necessary to take decisive action to provide adequate and equitable services. All too often, improvements to the administration of the statewide system have come about not because of the implementation of a coherent plan, but because of organic partnership between agencies and private partners working together within a fragmented system.</p> <p>To strengthen its home visiting system, the state should establish a lead home visiting division (likely under a centralized governance structure for all early care and education services) with the authority to provide oversight and make decisions regarding the full home visiting system. This new structure, in collaboration with public and private partners, will be responsible for ensuring the home visiting system features the following elements and/or functions.²To that end, the state should support and utilize existing capacity that has already been built - sometimes outside of state government - to support these elements and execute these functions.</p> |

7. Planning and Implementation

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| 7.b | Implementation team | <p>We support the creation of this nimble implementation team that will be informed by and representative of “orbiting advisory bodies from all areas of the early childhood field.” Ensuring that implementation continues to be informed by public-private tables and stakeholders –particularly parents, families, and providers - should be a priority of the Commission’s recommendations.</p> <p>We recommend citing the Early Learning Council specifically and describing the particular relationship. How will the two bodies interact? What formal or informal agreements and structures need to be established to ensure mutual benefit?</p> |
| 7.e | Immediate priorities | We so appreciate the inclusion in the report of the administration’s immediate 2021 priorities, broadly, and commend the staff for focusing on the listed workforce initiatives. |
| 7.e.i.3 | Rate increases | Any plans for rate increases should include Early Intervention reimbursement rates as well. The report only mentions child care. |