

FEEDBACK FOR THE NYS PRESCHOOL TASKFORCE
Submitted to Subcommittee
August 13, 2007

Program/Staff Responses

- What if age 3 really meant 3 and children needed to move into preschool at the time of their 3rd birthday?
 - Benefits
 - This would be a simpler transition for families. Transition dates and time frames can be very confusing. Also, it would be much easier for the OSC to coordinate the 3-5 eval. and to ensure that eval. results were current and appropriate for transition CPSE meeting.
 - Challenges
 - What about children who are above the age of 2-6 and the evaluation process. We are increasingly finding that we are having to complete two evaluations one for EI and then one for CPSE in a short time period.
 - What if the child's birthday is June, most CPSEs will not start services in July --this child might not start until September. This would mean an interruption in services.
 - Will children be allowed to transition before 3 if needed?
 - No Impact/Doesn't Matter
 - No matter what the decision is it will matter. All children are different and have different needs. Set ages make no sense--services should be based on need!
 - Individual needs should drive the system--not the all mighty dollar
 - If a child turns three during the summer, documentation of regression should NOT be required to start services.
 - Comments
 - Would there still be an early transition option before the child's 3rd birthday?
- What if Extended School Year did not have the strict regression requirements/justification and children could automatically have 6 weeks of limited services when entering Preschool over the summer?
 - Benefits
 - Some justification for ESY should be required, however, current guidelines for justifying services and documenting regression are FAR TOO VAGUE and open to individual interpretation and "enforcement." They do not translate well to preschool programming.
 - Low functioning children (below 1%) who make limited progress and are therefore difficult to document regression will be eligible for services.
 - This would also reduce the stress between the CPSE, Providers and County reps.
 - Challenges
 - The current regulations are open to too much interpretation. This

- includes the meaning of "Substantial Regression"
 - Are typical preschool children really supposed to regress?
 - I have heard at meetings that it is OK for children to regress, just not substantially.
 - No Impact/Doesn't Matter
 - Counties would fight this.
 - Comments
 - The use of ESY could be decided at the initial eval and not require another meeting later in the year. Annual reviews could focus on progress and not regression.
 - Children who are evaled. and begin programs in the spring do not get summer services because there is not time to document "Substantial" regression.
 - Any preschooler who is making NO progress IS regressing. Any amount of regression therefore becomes "substantial".
- What if all providers served both EI and Preschool programs?
 - Benefits
 - There would be more consistency for children and families.
 - Challenges
 - Counties may interpret this consistency in programming as preschool providers "recruiting" children through EI.
- If you are a provider of one system (EI or Preschool) and not in the other, please list the reasons why.
 - Comments
 - Although this agency is an approved provider for both EI and 4410, one counties has chosen to terminate our EI contract because after many attempts to get the county rep to follow statute and regs in EI and as a strong advocates for families, we initialted a systems complaint. The county was found to be in violation of a number of regualtion by DOH. Retaliation by the county---no contract renewed.
- What gaps from system to system need to be addressed to make the transition seamless for families and most effective for children?
- How can communication be improved from system to system?
 - Comments
 - Figure out how to facilitate flow of information.
 - HIPPA/FERPA laws
 - Better transfer of paperwork
 - Systematic processes across regions rather than every county doing their own thing
- What needs to be put in place to ensure successful integration into early childhood programs (child care, UPK, Head Start, etc.)?

- Comments
 - What happens to a complete continuum of services if our goal is to integrate all children into UPK, Head Start and traditional daycares? Is this really a viable goal to work towards? There will always be the child that some school program will say, "We aren't set up to accommodate the needs of this child." Where will that child go?
 - What about qualifications of personnel in childhood programs? "Teachers" with CDAs donot meet the highly qualified requirement of NCLB.
 - Differing program priorities; let's not lose childhood in a quest for academics.

- How can we increase the capacity and availability of preschool programs (i.e. special classes) that some children require?
 - Comments
 - Incentives for innovative ways to provide programs
 - Recognition of strengths already in place and a mechanism to faciltiate programs sharing best practices

- What other suggestions around transition and service delivery would you like to make?
 - Why are both systems involved? Consider SED assuming responsibility for both EI and 4410.....so a birth to 5 role. Currently, there is a conflict of interest between the two systems. With 4410, you have one system developing evaluating and developing IEP's (with the only role of the county to pay for the services) while in EI the county both "approves" and pays for those approved services. Then, as that child transitions into kindergarten-districts are often wanting to alter the level of service that child receives since they then assume financial responsibility. The county needs to be out of the mix in EI and 4410.
 - The county's role in CPSE meetings needs to be more clearly defined. Their representatives should NOT be driving decisions made regarding IEP's since their interest is purley financial.
 - There should be a more effective way to monitor counties with regards to appropriate service delivery through EI. Currently, the same people who pay for children's services are responsible for deciding what services they are approved for. this is a direct conflict of interest.
 - Parents frequently have difficulty knowing what they need to do with the transition and the school district. Especially since it requires additonal evaluations, and occasionally a change in service provider.
 - I firmly believe that the county reps. are more focused on \$\$\$ than on the service a child receives. It is like having the fox watch the hen house. There has got to be another way for the county to administer the program without fiscal concerns being front and center.