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Governor Polis,

Our state's investment in early childhood care and education is a source of great pride. The funding from Proposition EE furthers the progress that has been made to invest in children today so they can thrive and lead the future. And while we applaud the state's success in investing in kindergarten and now pre-kindergarten, we are concerned that we are not ready to launch a new Department of Early Childhood that will achieve the goals of a more seamless experience for families navigating early childhood education opportunities.

County and school leaders write to you today to share common concerns related to the creation of the new Department of Early Childhood (DEC). Like you, we are committed to seeing the new Department succeed. An undertaking this ambitious, however, commands detailed planning to ensure a smooth transition. Profound implementation questions - from what will happen to the rules and regulations governing programs in other departments that shift to DEC to interoperability challenges for existing IT systems - still need to be worked through. There are three primary concerns that are key to success of the new department that commissioners and school leaders share. Those are: 1.) the proposed governance structure of the DEC; 2.) the lack of a detailed plan for the 'local leads' and 3.) deep alignment with other state departments to avoid creating new silos for families.

As proposed, the DEC will consist of an Executive Director with no oversight board. This gives unilateral decision making to one person. We support a rule making body with members whose voice is empowered and shares in the accountability of a successful DEC. An appointed rule making body helps ensure that disparate interests and viewpoints on policies and procedures have an equal opportunity to be heard and vocalized. We appreciate the intention behind an advisory committee but have concerns that, in the absence of any real authority, dissenting viewpoints will be muted or disregarded. Additionally, the DEC will oversee the Colorado Child Care Assistance Program (CCAP) and the Colorado Preschool Program (CPP). Both of these programs include local county and school district taxpayer dollars. In the absence of a shared accountability structure, decisions made unilaterally by an Executive Director could result in unfunded mandates for counties and schools.

There are many unanswered questions related to the 'local leads'. We understand that the local lead will be the access point to all early care and learning programs, including CCAP and universal preschool. Questions we have include: What is the process for choosing a local lead? Who defines the geographical service area of a local lead? How will local leads get their costs covered? What is the time frame for identifying the local leads? What is the local lead's role with the universal application and how will they know which early care and learning program a family is using? How is a universal application envisioned, what technology will be used, how will it be connected to other platforms that allow for applications to human services and education programs? We understand that counties will still administer CCAP. If a county chooses not to be a local lead, how will the local lead work with the county to ensure services? How will the provider level expectations be balanced with local lead expectations? While we understand the state will grant local leads flexibility, basic operational expectations and standards need to be identified so that the local leads, who appear to be the 'on the ground' implementation unit for the DEC, succeed. While the DEC is long on vision, it is short on implementation details, which leaves those of us who will implement the new vision wary.

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Finally, while the goal of creating a streamlined process for families to access early care and learning is laudable, we continue to be concerned about the unintended silos we may be creating for families. We expect many families who interact with the DEC for early learning needs to have other needs as well. Mom might be suffering from a substance abuse addiction, need food assistance, Medicaid, and have a child with special educational needs. We are concerned that these families will become further removed from coordinated care and getting all of their needs addressed. We also pride ourselves on the strides we've made in connecting child maltreatment prevention programs and child welfare efforts administered by counties. Many questions remain unanswered. Can the Promoting Safe and Stable Families legally move under Federal law? If the Family First Prevention Services Act only allows Colorado to earn federal funding on prevention programs when a child welfare case is open, how will the two state agencies overseeing child welfare and prevention programs interact, communicate, align data and investments? We understand that this has been a shortcoming of other states that have stood up early learning departments and recommend outlining specific alignment metrics and expectations in the 2022 bill to safeguard against the creation of new silos.

We share your desire for a successful Department of Early Childhood. Our reservations reflect our concerns and doubts that standing up a brand-new department while rolling out universal pre-kindergarten in the absence of details to fundamental implementation questions is not the recipe for success. We applaud your staff and the many hours they have spent with us. Their dedication and attempts to flesh out basic implementation issues is admirable, but our conversations illuminate new questions and considerations which leaves us wondering why this level of analysis has not happened before now and nervous that we will miss the mark for the families we serve. We strongly urge you to reconsider revamping so many systems at once. Instead, we recommend you set up the foundation of the DEC and focus exclusively on the successful implementation of universal pre-kindergarten and the creation of a universal application. After we succeed in this critical work, then we can do the important work it takes to properly address how to braid funding streams, rules, and policies to offer CCAP, the Colorado Preschool Program, and Head Start as well, and to determine which family strengthening programs should move to the DEC and how they will maintain close alignment with those that do not.

We look forward to your response to our recommendation and a continued dialogue with your staff as we move forward together on this important endeavor.

Sincerely,

CCI
CASB
Rural School Alliance
CASE