



Norwood Extended Day Program  
275 Prospect Street #23  
Norwood, MA 02062

August 1<sup>st</sup> 2020

Commissioner of the Massachusetts Department of Early Education  
Samantha Aigner-Treworgy  
51 Sleeper Street | 4<sup>th</sup> Floor  
Boston, MA 02210

To the Attention of: Samantha Aigner-Treworgy, EEC Commissioner,

Congratulations, Ms. Aigner-Treworgy, on your recent assignment to lead the Department of Early Education and Care (EEC) for the state of Massachusetts. We are grateful for your guidance during this time of great turmoil and look forward to the advancements in early education resulting from your leadership. Our motivations for writing to you today are in regard to the new mandates for federally funded, unlicensed school-age childcare programs which initiated in the fall of 2019. As a twelve-year childcare professional, and one who has worked for over ten years in licensed 501c3 non-profits, I can attest to the positive impact EEC has had on maintaining ethical and safety standards for school-age programs in Massachusetts.

Norwood Extended Day is a school-age childcare program which falls under the jurisdiction of the Norwood Public Schools. Norwood is a community of mixed racial and economic demographics, with just under 3% of our 30,000 residents living below the federal poverty line. Of that population, nearly 10%, or 35 of our 350 enrolled students across our seven sites receive federal support through partial or full voucher subsidy provided by the EEC. Our program is classified by the EEC as non-licensed, federally funded, offering 12-months of childcare including Before School, After School, Full Day Vacation Week Care, and Full Day Summer Program services. During vacation weeks and summer programs, our voucher-dependent enrollment increases from 10% to 20%--a shift illustrating the critical function we serve for families impacted by economic hardship.

As you may already be aware, public schools across Massachusetts are managing a tremendous crisis of how to safely return to schools. Districts are in the throes of addressing new bussing regulations, providing equitable access across areas of access from technology to nutrition and food security, in addition to sorting many other logistical and operational dilemmas in the coming weeks. Districts are facing significant impacts to their budgets as they work to meet evolving state mandates and new requirements for Personal Protective Equipment (PPE). This impact is no different for childcare facilities. The majority of childcare facilities across the nation have scaled back so significantly, and have been operating on a shortage of revenue for the majority of 2020, that they are not in a position to fully open this fall. This crisis intersects with a rise in parents' childcare needs; parents cannot envision returning to



school without the availability of childcare to support their very real economic needs—needs which tie directly to housing, transportation, nutrition and personal safety.

In Fall of 2019, the EEC released several reports outlining new mandates for unlicensed, federally funded programs. These mandates mirrored those required for programs *licensed* by your agency. As a result, many of the unlicensed, funded programs had to withdraw their partnership with EEC as they were unable to meet the mandates in the time allotted and with budgets available during the 2019-2020 school year. This came as tremendous disappointment and economic upheaval for the programs' most vulnerable families. In particular, it is being experienced as compounded disadvantage for primarily single-parent households in which single mothers had primary custody and guardianship of their children. The outcomes of the new unfunded mandates and the constraints under which programs were placed, make choices about whether providers can continue to support voucher-dependent families incredibly discouraging. These choices providers are forced to make appear to completely belie the mission and principles of the Department of Early Education and Care. They erode the promise to economically disadvantaged families—particularly single mothers—that your agency is in existence to meet their needs and your services are oriented to support their children. These are children who we understand from decades of research, need child care programs to support with socialization, emotional development, literacy and language acquisition, nutrition and wellness, and to provide a level playing field among their economically-advantaged peers when they enter the public-school classroom.

Norwood Extended Day is under similar duress today; we are now in a position where we need to evaluate whether we can maintain our childcare services for families in need under the new EEC regulations. It is our job to protect our communities most vulnerable children and families and we believe that we were doing through partnerships such as these. We have come to understand from our Funded Program Monitor and Regional Supervisor that any grants which have been made available to compensate for the new mandates, especially those which fall under the COVID-19 Re-Opening Plans, are only available to *EEC licensed programs*. Our program, and programs like ours, which are under the jurisdiction of the city or town and which are financially self-sustaining, have a sizable financial barrier now due to the EEC's increased regulations. This is compounded by the reality that for over four months, programs such as ours have been minimally surviving during a world-wide pandemic. A synthesis of all of the information contained within this letter does not reveal any of the moral or ethical underpinnings of an agency whose primary responsibility it is to support women, children and families living below the poverty threshold.

To provide context, we estimate that the following EEC mandated encumbrances will prevent our program from continuing to offer programming to voucher-dependent families:

- Ten hours of online training for every staff member before September 30, 2020 (-\$10,000)
- Individual Cubbies or Tubs to contain students' personal affects (no-touch) (-\$5,000)
- Every staff member, custodian, food worker, must be undergo BRC through EEC despite having done so already through the public-school system (-\$3,500)
- Multiple CPR/First Aid certified staff per site (-\$1,500)
- New PPE expenses related to Reopening efforts (\$2,000)

These financial implications do not address the additional mandates having to do with the procurement of extensive documentation from our Building and Grounds and Transportation Departments for every



bus, bus driver and building we occupy. The extent and level of safety measures makes sense for programs which are *licensed* under your office. Funded but unlicensed programs should not bear the same burden—especially if their inability to do so results in hundreds, if not thousands, of families losing childcare after what as been one of the hardest years in a half-century.

We are asking you to revise your mandates for *unlicensed, funded programs* and that any grants or scholarships necessary to meet the new EEC Reopening requirements be available to all impacted Providers, not just licensed programs. We are also asking that you review the deadlines for compliance beyond September 30<sup>th</sup> 2020. After four months of no revenue, our program—like so many others—cannot afford to tackle these mandates without financial support and an extension to the timeline provided.

Help us help our community's most vulnerable families. As a fellow champion of childcare, you understand that what we do is often the invisible backbone of our cities and towns. As our parents look to the fall with equal parts hope and uncertainty, we cannot abandon now.

We are committed to providing continuing care through a partnership with the Department of Early Education and Care.

We look forward to a response and to your guidance for the fall,

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