

April 6, 2021

The Honorable Gavin Newsom
Governor, State of California
State Capitol, First Floor

The Honorable Toni G. Atkins
President pro Tempore, State Senate
State Capitol, Room 205

The Honorable Anthony Rendon
Speaker, State Assembly
State Capitol, Room 219

RE: Letter of Concern- AB 22

Dear Governor Newsom and Legislative Leaders,

We, the undersigned, are early education and anti-poverty advocacy and service organizations serving California's low-income children and families. We are writing to express our concerns surrounding AB 22 (McCarty), which would expand transitional kindergarten to all 4-year-olds. While we appreciate the bill's intent to ensure that children are ready to thrive when they enter a public school system, we believe there are unintended consequences that will arise as a result of implementation of AB 22 that would harm, not help, California's low-income children and families.

This bill does not address what at-risk children need.

Four-year-old children are not developmentally ready to be in a more traditional elementary school setting or program which would cause multiple transitions and disruptions during the day to move them to other programs to meet the full day needs of their families. Children this age need consistency, attachment and a nurturing environment who can manage not only their early learning, but also their social and emotional development and basic self-regulation skills. To be blunt, these children need naps and care.

This bill does not address if low-income four-year-olds who continue to be eligible for State Preschool or Head Start programs can receive the wraparound services provided through those programs. Wraparound services include counseling, crisis care and outreach, special education services and tutoring, health services, legal services, and family support. We are concerned that eligible students and families who are placed into transitional kindergarten, who need these services the most, will not have access to them.

Additionally, high student-teacher ratios in transitional kindergarten would make it difficult to properly teach four-year-olds. When there is a lower student-to-teacher ratio, currently 1 to 8 in Head Start and State Preschool, students will receive more attention from their teachers. Teachers themselves have more manageable workloads as they have fewer students to keep track of, which in turn translates into them having more time to spend one-on-one with students. Furthermore, this bill does not fully address the training requirements that K-12 teachers will need to serve 4-year-olds. While the bill does contain a requirement for teachers to receive training in early education, the 24 units as required by AB 22 cannot compare to the extensive training like teachers in Head Start programs undergo to qualify as a teacher.

For example, Head Start teachers must have a *minimum* of a Child Development Associate's Degree or equivalent credential *and* have been trained in early childhood development with a focus on infant and toddler development.

This bill does not address what parents need to work.

AB 22 does not require transitional kindergarten to provide a full-day and full year program, nor does it ensure students who attend transitional kindergarten will have access to full-day programs, as recommended in the Blue Ribbon Commission Report. *But this is what parents need.* For parents to work, they need childcare options that are flexible and convenient for families and that meet their individual needs. Overnight grocery store workers will need a different schedule than those who work in offices or retail stores – none of these schedules that include nights, weekends and 10-hour work days align with the typical 'K-12 school' day. Family work schedules in California are just as diverse as our population.

The early learning and care system cannot survive an expansion of TK.

Expanding TK will create challenges for a system already taxed by the pandemic. *Almost 7,000 family childcare homes shut their doors between March and December, 2,443 permanently, according to the California Department of Social Services.*

- ***Expansion will drain an already lean workforce.*** This bill would create the need for more qualified staff which are already difficult to recruit and retain. This is partly due to an underfunded system that undervalues and underpays the workforce. In addition, school districts, which typically pay higher wages, will attract qualified staff, and thus create a challenge for non-LEA based providers.
- ***Expansion could put Federal funding at risk.*** The bill in its current form does not address the California State Preschool Program, qualified private providers, and the collaboration and partnership with Head Start in serving 4 year-old children and providing a full day of comprehensive services. This collaboration was highlighted in the Blue Ribbon Commission report, which specifically recommended that California “Expand effective access to Head Start for eligible 3- and 4-year-old children by using state funds to expand HS programs to full-day, full-year for all those meeting Head Start eligibility to “Ensure California utilizes all available federal Head Start funds.” Head Start brings over 1 billion dollars into California, and over 65% of those dollars serve 3- and 4-year-olds. State Preschool programs and qualified private providers wrap and blend funding with Head Start programs, to offer comprehensive full child/full family services. Transitional Kindergarten does not offer the same whole child approach.

The undersigned organizations and individuals call on you to ensure that these concerns are addressed with the author of the bill, so that our state can ensure it is truly doing its part to serve our communities and children who need it most.

Sincerely,

Allies for Every Child
California Alternative Payment Program Association
California Association for Education of Young Children
California Child Care Resource & Referral Network

Californians for Quality Early Learning
Central California Child Development Services Inc. HS/EHS
Child Care Law Center
Child Development Resources of Ventura County Inc.
Child Start Inc./Napa-Solano Head Start
Child Care Alliance Los Angeles
Child Care Resource Center
Children's Institute Inc. Early Head Start
Children's Institute, Inc. Head Start
CommUnify (formally Community Action Commission of Santa Barbara)
Community Action Partnership of Kern
Community Action Partnership of Madera County
Community Action Partnership of San Luis Obispo County Inc.
Community Action Partnership of Sonoma County
Early Care and Education Consortium
Easter Seals
El Concilio
El Dorado County Office of Education
Every Child CA
Foundation for Early Childhood Education Centers Inc.
Head Start California
Institute for Human and Social Development
Kai Ming Inc.
KidZCommunity: Placer Community Action Council Inc.
Los Angeles County Office of Education
MAAC Project Head Start/Early Head Start
Mexican American Opportunity Foundation
Mission Neighborhood Centers Inc.
Modoc County Office of Education
Mountain Empire Unified School District
Mountain View School District
Neighborhood House Association
North Coast Opportunities Inc.
Northern California Child Development Inc.
Options for Learning
Orange County Head Start, Inc.
Pacific Clinics Head Start/EHS
Para los Ninos
Peninsula Family Service
Shasta County Head Start Child Development Inc.
Sierra Cascade Family Opportunities Head Start
Siskiyou Early Head Start
The Resource Connection Early Childhood Program
Venice Family Clinic
Vista Del Mar Child and Family Services/Home Safe
Volunteers of America Los Angeles
Wu Yee Children's Services
YMCA of the East Bay /Early Childhood Services

