

Sample Letter about HB 2458, SB 1095, and SB 1313

January 16, 2019

Dear Delegate _____ (or Senator _____):

I am a member of [name of church], which operates [name of Christian school]. Our ministry is a member of the Old Dominion Association of Church Schools.

I am writing to you to express my thoughts about three important bills before the General Assembly: HB 2458, SB 1095, and SB 1313. These bills shift all childcare licensure and licensure exemption policy from the purview of the Department of Social Services to the purview of the Department of Education. I appreciate the fact that these bills keep current protections for church-run children's ministries and for church-run preschools and daycares intact. I also appreciate the general concept of having our church-run preschools no longer being treated like daycares under the law.

However, I have a number of serious concerns about other provisions in these bills. I feel that there is undue haste to move forward with these bills without first addressing a number of very important questions. Following are four questions that ODACS has raised about the bills; I am asking that you try to find good answers to each of these questions before lending your support to the bills. Also following is one amendment to the bills that ODACS is suggesting.

I appreciate your service to our Commonwealth. Thank you for considering my opinion.

Sincerely,

[Your Name]

Questions about HB 2458, SB 1095, and SB 1313

Question 1

Lines 982-989; 22.1-289.02.B.2

This section speaks of aligned standards, goals, assessments, and measurements for early childhood education. Will private preschools remain free to set their own standards, as private K-12 schools are now?

Question 2

Lines 1027-1039; 22.1-289.02.C

This section establishes a Unified Quality Rating System that applies to all publicly-funded child day centers. Participation for all other centers will be voluntary. Will participation for privately funded centers remain voluntary? Will the rating system become a vehicle for prescribing curriculum for privately-funded preschools? Will the rating system also become a vehicle for prescribing workforce requirements for privately-funded preschools?

Question 3

Lines 1094-1100; 22.1-289.06

This section gives the governor power to initiate an investigation into the "management" of any child care institution that is licensed or that is required to be inspected. Why would the General Assembly give the governor this kind of power? What does the word *management* mean? Are not the state's current powers of inspection and investigation sufficient?

Question 4

Lines 1101-1145; 22.1-289.07

This section establishes the Virginia Preschool Initiative. Does the disbursement of VPI funds to church-run child care centers violate Article IV, Section 16 of the Virginia Constitution?

Proposed Amendment to HB 2458, SB 1095, and SB 1313

New line 726, to start as follows:

§ 22.1-9. Appointment, terms, and vacancies.

The Board of Education shall consist of ~~nine~~ *eleven* members appointed by the Governor, at least two of whom shall represent business and industry in the private sector in the Commonwealth, *one member who shall be a representative of stand-alone licensed child care centers that meet the accountability standards of state recognized accreditation pursuant to § 22.1-19, and one member who shall be a representative of child care centers exempt from licensure pursuant to § 22.1-289.029*. Every appointment to the Board shall be for a term of four years, except that appointments to fill vacancies other than by expiration of term shall be for the unexpired terms. All appointments, including those to fill vacancies, shall be subject to confirmation by the General Assembly, and any appointment made during the recess of the General Assembly shall expire at the end of 30 days after the commencement of the next session of the General Assembly. No member of the Board shall be appointed to more than two consecutive four-year terms.

Rationale: The General Assembly has already included the two child care seats on the State Board of Social Services. Should all child care policy be moved to the purview of the Department of Education, the General Assembly should include the same level of representation for these two groups.