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# STATE OF CONNECTICUT

## OFFICE OF EARLY CHILDHOOD



Beth Bye  
Commissioner

**Testimony of Beth Bye, Commissioner  
Office of Early Childhood  
Before the Education Committee  
H.B. 6759 – An Act Concerning Office of Early Childhood  
March 1, 2023**

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Greetings, Senator McCrory, Representative Currey, Senator Berthel, Representative McCarty and distinguished members of the Education Committee. I am Beth Bye, Commissioner of the Office of Early Childhood (OEC). I am here today to testify concerning H.B. 6759 - An Act Concerning Early Childhood.

The OEC appreciates the intent of **Section 1** of this bill, which seeks to increase wage compensation for early care and education professionals. The low wage compensation for early childhood professionals is a national problem. However, the mandated wage increase is not include in the Governor’s budget. To help address this problem, the Governor has created an Early Childhood Education Blue Ribbon Panel to examine the child care industry and set a 10-year plan that assures CT families have access to high-quality child care. The plan will address wage compensation, quality, access, and affordability. This panel will include employers, providers, and families to ensure the early care and education system works for all stakeholders.

Section 1 of this bill would require that each employee of an early childhood care and education program be paid an annual salary as outlined in the legislatively mandated compensation schedule report developed and submitted by the OEC to the General Assembly. The bill states that if the employee’s salary is greater than the amount identified in the report, the employee shall be paid the greater amount. “Early childhood care and education program” is defined in the bill as any licensed child care center or group child care home, inclusive of state-funded School Readiness and Child Day Care programs, and any license-exempt child care program located in a public school but not administered by the public school system.

Public Act 19-61 required the Office of Early Childhood (OEC) to develop a proposed early childhood educator compensation schedule for lead teachers employed by state-funded programs. The report was carefully developed over many months, informed by national research and data, and submitted in late 2022. The state-funded programs are the School Readiness and Child Day Care programs, serving approximately 16,000 children.

All publicly funded programs, including federal Head Start, comprise about 30% of early care and education programs in Connecticut; private programs comprise 70% of the market. While the state's role is important, state funding is only about 17% of a \$1.4 billion child care industry. Parents pay the largest share of child care costs in Connecticut (37%). Many programs are tuition based and 100% funded by parent tuition and fundraising. Requiring all programs to pay the salaries as outlined would result in much higher costs to families. Providing funding specifically to state-funded centers to comply with this requirement would require significant unbudgeted resources. *(Data from the recent early care and education financing study by Social Ventures Partners for the OEC.)*

In the report, OEC recommends the proposed compensation schedule be viewed as a guideline for programs, not a requirement to adhere to, due to variants in funding and staffing shortages across the state. The OEC also recommends that the compensation schedule be shared statewide as a baseline goal for early care and education wages - inviting all providers to assess the possibility of these expectations regardless of whether they are state funded.

This compensation schedule report provides salary guidelines for the early care and education field, while acknowledging that this cannot be achieved immediately and will require a longer-term phased-in strategic plan. While the OEC appreciates the intent behind this legislative proposal, the funds required to support it are not available and has the real potential to price parents out of the market if not part of broader strategic and long term planning.

The OEC also appreciates the intent of **Section 2** of this bill, which seeks to continue expansion of Care 4 Kids income eligibility and approved activities that has been funded with federal COVID relief funds. The bill would remove reference to the availability of federal funds received pursuant to the Coronavirus Response and Relief Supplemental Appropriations Act, P.L 116-260 and the American Rescue Plan Act of 2021, P.L 117-2. The OEC cannot support this language change as the Governor's budget does not include permanent state funding to make up the entire gap caused by the expiration of the federal COVID relief funds. The Governor's budget does propose \$35 million in one-time ARPA funds to smooth out the Care 4 Kids enrollment management process to allow additional families to enroll in the program moving forward.

**Section 3** of this bill would create a license exemption for the Stamford Police Activities League, Inc., a Stamford-based nonprofit youth activities organization. We have sought out and reviewed details about this program and our licensing and legal team have determined that this child care program needs to be licensed by the Office of Early Childhood (OEC) under Sec. 19a-77 since the activities it provides or intends to provide do not meet a current exemption.

The OEC is the agency responsible for licensing of child care centers, group child care homes, family child care homes, and youth camps in Connecticut. The regulations that govern licensing

establish the minimum health and safety requirements that programs must meet and are designed to protect the health, safety, and well-being of participating children. Licensing ensures accountability and oversight of these baseline standards in critical areas such as abuse and neglect, staff-child ratios, staff qualifications, health care, educational requirements, and physical plant safety. More than 3,500 child care programs in Connecticut, including youth camps, are licensed and uphold the standards outlined in legislation.

While some child care programs are not required to be licensed, this creates a lack of fundamental equity and fairness when regulations that serve children of the same age and needs are not applied universally. Children served by unlicensed exempt programs do not benefit from the same level of health and safety protection offered by licensed programs through the conduct of staff criminal record checks, ongoing unannounced inspections, and complaint investigations by an outside source. The OEC receives complaints from parents, child care staff, local officials and others about programs that are licensed and license-exempt. Such allegations involve such issues as child abuse and neglect, health and safety hazards, and lack of supervision. While these allegations may be alarming, the OEC has no authority to investigate such concerns when such allegations are made against license-exempt programs that fall outside the OEC's oversight. The OEC believes that all children should be afforded the same health and safety protections.

This program, similar to Police Activity Leagues in other communities that hold youth camp licenses, has options. The Stamford Police Activities League could pursue licensure through the OEC. Our licensing staff are ready and available to assist programs through the licensing process. Or the Stamford Police Activities League could work in collaboration with the City of Stamford to administer the program. For licensing requirement purposes, child care services do not include services that are administered by a municipal agency or department. In that situation, the Stamford Police Activities League would be required to inform parents and legal guardians of any children receiving such services and enrolled in the program that the organization is not licensed by the OEC. Many programs like PAL work with either their Board of Education or City or Town on this administration option.

**Section 4** would allow licensed child care programs that maintain a supply of epinephrine cartridge injectors to administer epinephrine to a child in the care of the provider who experiences an allergic reaction who does not have a prior authorization of a parent or guardian or a prior written order of a qualified medical professional. The bill allows the child care staff to administer epinephrine only if that person has been trained how to administer the epinephrine, as defined in section 19a-909 of the general statutes. Also, the parent or guardian may submit, in writing, that they do not want the child care provider staff to administer epinephrine.

After multiple discussions over several years with the Department of Public Health, the state agency with expertise on this issue, the OEC does not object to this proposal. We do have concerns that the language provides for an opt-out rather than an opt-in permission from

families, and it will be important for the child care staff to be trained in recognizing the signs and symptoms of an allergic reaction along with the technique of administration. Should this proposal pass, our licensing and legal team will develop and implement guidance to assist child care programs who decide to stock epinephrine cartridge injectors.

Similar language was adopted in 2019 when the DCF Wilderness School, a OEC licensed youth camp in New Hartford, advocated for similar measures. That legislation authorized qualified wilderness school employees to administer epinephrine to a student who experiences a presumed allergic reaction and does not have a prescription from a qualified medical professional. The injector may only be used if a parent or guardian has provided written authorization, and no qualified employee who administers the injector may be held liable to the student or the student's parent/guardian for personal injuries incurred as a result of administering the injector. What sets this law apart from the current proposed language is the reasoning for such language. DCF staff from the Wilderness School take children on hikes in remote areas that may not be immediately accessible to emergency personnel, whereas most child care programs would have immediate access to epinephrine carried on all ambulances and administered by EMTs.

Thank you for your time and attention. I am happy to answer your questions now and/or at a later date. The OEC is committed to work together—with legislators, the executive branch, providers, advocates, and parents—to better serve our families with young children.

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### ***About the OEC***

*The Connecticut Office of Early Childhood (OEC) advances a two-generation family-centered approach in our pursuit of optimal health, safety and learning outcomes for young children. Through our core programs, we support infant and toddler care, preschool, after-school care, child care and youth camp licensing, home visiting, and early intervention to address developmental delays. The OEC is working toward better coordinated, cost-effective services that support Connecticut's youngest children and families.*