



October 24, 2014

Dear Montana Preschool Provider,

We are concerned about your valuable place in our Montana communities as a business and an institution of excellence. Your facility is now at risk of government intrusion into your curriculum, employee qualifications, hiring practices and business structure.

Your action is needed to stop this intrusion into your business.

Gov. Steve Bullock recently rolled out his plan for a universal, publicly-funded preschool program called Early Edge Montana. The Governor's plan allows two things. First, public schools would be allowed to create their own state-funded pre-school programs that would directly compete with yours. Second, in lieu of creating their own program, the public schools would be allowed to partner with you to provide free pre-school services to families. However, this partnership is not truly a partnership; it is a power grab. Private pre-schools would be eligible to receive state funding only if they agreed to comply with onerous state standards being proposed by the Board of Public Education (BPE). In other words, your pre-school would lose its autonomy and become a branch of the public education system. New Rule I states that your program "would be an integral part of the public school."

The Montana Board of Public Education (BPE) intends to adopt these new rules **on November 3**. The proposed rules are burdensome, intrusive and unnecessary and were drafted in a hurry to accommodate the Governor's timeline. There is no indication that these standards are universally thought of as high-quality standards. The proposed rules contain, at a minimum, the following reasons for concern:

1. New Rule I - requires accreditation of your program by the state Board of Public Education;
2. New Rule I - requires you design your program around the state's definition of "four core developmental domains" and provide a curriculum to match, whether you agree that these are best practices or not;
3. New Rules II and IV - require your teachers to be state licensed and endorsed;
4. New Rule II - requires you provide state-approved professional development for your teachers;
5. New Rules V & VI - require paraprofessionals in the classroom who have a 2-year degree or that they meet an undefined "rigorous standard of quality;"
6. New Rule VII - limits your class size to 10 children per licensed teacher;
7. New Rule VIII - gives authority to the public school board to set your schedule;
8. New Rule XIII - requires compliance with federal rules for meals and snacks.
9. In addition to the accreditation standards for your program, the rules for teacher licensure require that teachers be taught to teach according to the Montana Content Standards, which are currently aligned to the Common Core and the state's Early Learning Standards and are changeable at the will of the Board of Public Education.

There is nothing stopping the BPE from eventually attempting to impose these rules on ALL Montana preschool businesses. If you do not speak up now, and these rules go into effect, precedent is being set and eventually you could be forced to hire teachers with four-year degrees. What would that look like for your budget? You could eventually be bound to a government-mandated curriculum and lose the flexibility you currently have when tailoring your curriculum to your students' needs and abilities.

**Concerned Women for America of Montana**

P.O. Box 20368 • Billings, MT 59104 • (406) 530-9275 • [director@montana.cwfa.org](mailto:director@montana.cwfa.org) • [mt.cwfa.org](http://mt.cwfa.org)

The Montana Board of Public Education is composed of seven members who are appointed by the governor for seven-year terms. They have the authority to make rules regarding teacher and school accreditation in Montana. Without your voice, these rules will be approved and adopted on November 14, 2014.

**Please take action today in the following areas:**

1. Send an e-mail to the Board of Public Education Executive Director Peter Donovan at [pdonovan@mt.gov](mailto:pdonovan@mt.gov) by November 6. Tell him, as a preschool owner, that you disapprove of the BPE adopting these new rules; they are bad for Montana's preschool businesses and Montana's children who deserve so much more than a one-size-fits-all approach to preschool education. (Protocol is that all comments from the public are to be sent to Mr. Donovan only not board members.)
2. Make plans to attend the public hearing regarding these new rules on November 3, 2014, at 10:00 a.m. at the Office of Public Instruction Conference Room, 1300 11th Avenue, Helena, Montana.
3. Pass this information on to staff, family and friends so that they can take action as well.

Without you and your voice, many Montana preschools will inevitably be forced to close their doors. Families are already barely able to make ends meet, and if they have the option of "free" public preschool vs. private pay preschools, they are likely to choose the one that saves them money.

Preschool providers deserve to have the ability to make choices regarding the curriculum and structure of their business. Each child has a different set of needs and a one-size-fits-all approach to preschool is not what Montana children need. Montana parents need options that fit their child's needs.

Privately run preschools, like yours, have deep roots in our Montana communities. They have been effectively teaching our most precious members of society for 10, 20, even 30+ years. We cannot lose this valuable commodity. Please make your voice heard TODAY as time is short.

If you have further questions, please do not hesitate to contact me at 406 -530 -9275 or [director@montana.cwfa.org](mailto:director@montana.cwfa.org). You can view links to the proposed rules including Educator Preparation Program Standards, Educator Licensure Requirements and the actual Preschool Standards at [cwfa.org/Montana](http://cwfa.org/Montana).

Sincerely,

Kari Zeier  
State Director  
Concerned Women for America of Montana

*Concerned Women for America is the nation's largest public policy women's organization.*

---

**Concerned Women for America of Montana**

P.O. Box 20368 • Billings, MT 59104 • (406) 530-9275 • [director@montana.cwfa.org](mailto:director@montana.cwfa.org) • [mt.cwfa.org](http://mt.cwfa.org)