***Issues of Concern Regarding Montessori Early Childhood Programs in the State of Colorado***



**7.702.2 D***Any center having a director assigned to a classroom shall have qualified and adequate staff, allowing the director or qualified staff the ability to attend to the duties of a director as they arise.*

**THE ISSUE:  As a small school, this is a tremendous hardship on our program.  Our director has always functioned as a lead teacher and director without having to hire another person just in case director duties arise.  In the Administrative guide under clarification the duties mentioned are "greeting and assisting visitors to the program, providing human resource management, supervision of program staff, responding to emergencies, addressing parental needs, compliance with regulations."  None of these listed duties has ever interfered with my ability to be in the classroom.  And the financial burden of hiring someone else would put us out of business.**

**7.702.41 H** *Staff members must be current for all immunizations routinely recommended for adults by their health care provider.*

**THE ISSUE: Are personal exemptions for immunizations by staff members allowed?**

**7.702.45 A 13** *Maximum Group Size for Mixed age group 2.5-6 years of age is 20 children.*

**THE ISSUE: Montessori teachers are trained to teach class sizes of up to 30 children of this age. Montessori is a systems-based approach to teaching and learning. This means that it’s not the individual parts of the curriculum that are important; it is how those components come together. A larger class size, coupled with an orderly classroom, observant teachers, a focus on building independence and an internal locus of control, and a system for students to spend extended periods of time choosing, doing, and putting away learning activities without adult help, makes the other components more powerful.**

**Large class sizes continue to be viable in classrooms that implement each tenet of the Montessori philosophy. The tenets particular to large class sizes include:**

**• Children’s learning is best accomplished in a structured and orderly environment;**

**• Curriculum is based upon sensitive periods;**

**• Teacher is an observer than guide rather than a director of learning;**

**• Children are grouped in multi-age groups and peer teaching is common;**

**• Self-regulation of the children results from rigorous practice of the first four tenets.**

**This is by no means an exhaustive list of the elements critical to a quality Montessori classroom. It is not even a list of the elements critical to a classroom qualifying as Montessori. However these are the tenets that are difficult to practice without a larger class size and through which a child will benefit greatly if the class is large enough.**

**How many students are typically in a 2.5-6 year old (Primary) Montessori Classroom?**

**AMI School Recognition: 24-35 primary (3-6 years)**

**AMS School Accreditation: 30 early childhood (2.5-6 years)**

**There are documented studies and research to support larger class sizes with proper tenets in place from the American Academy of Pediatrics, American Public Health Association, National Resource Center for Health and Safety in Child Care and Early Education, Harvard University and The National Academy of Sciences. We are happy to share that information upon request.**

**7.702.45 A 13 c** *Group size for children in preschool and school age classrooms may be exceeded for circle time, meal and snack time, special occasions and activities. The room capacity must not be exceeded.*

**THE ISSUE: There is no mention of outdoor play/recess in this rule. By omission, it is being interpreted by some licensing agents to include the playground. When staff:child ratios are properly maintained and the proper square footage is provided, there is no need to require that the ‘room capacity’ be maintained – ROOM CAPACITY is not the same as PLAYGROUND CAPACITY. This rule creates a hardship on staff to maintain ‘zones’ on a playground or hardship on administration to reorganize daily routine. In Rule 7.702.73 B – OUTDOOR AREA REQUIREMENTS – there is absolutely no mention of a maximum capacity of children for outdoor play areas other than with staff/child ratios and square footage requirements.**

**7.702.45 C Child Care Health Consultant**

*4. Child Care Health Consultants (CCHC) hired after February 1, 2016, must complete the Department approved Child Care Health Consultant (CCHC) training within six (6) months. The center must obtain and maintain proof of course completion.*

*5. Child Care Health Consultants (CCHC) employed as a health consultant prior to February 1, 2016, must complete the Department approved Child Care Health Consultant (CCHC) training by August 1, 2016. The center must obtain and maintain proof of course completion.*

*6. All Child Care Health Consultants (CCHC) must complete the Department approved Colorado Department of Public Health and Environment (CDPHE) immunization course annually.*

**THE ISSUE: The new demands on CHCC’s have caused many local nurses to stop providing this service to childcare centers. They have reported the increased time for training and the perceived increase in liability on them personally have made this an unattractive job.**

OTHER CONCERNS:

1. The amount of additional work this has been put on directors with the new set of Rules and Regs is overwhelming. The mounting administrative tasks are cumulative and the demands on time take us away from other duties like mentoring younger staff, helping with behavior plans, communicating with parents. These requirements take the most experienced teacher further and further away from the child.

Examples:

* 1. **7.702.33 D** *Effective September 30, 2016, all staff must complete a pre-service training prior to working with children. The training must include:*

*1. Building and physical premises safety, including identification of and protection from hazards that can cause bodily injury such as electrical hazards, bodies of water, and vehicular traffic; and,*

*2. Handling and storage of hazardous materials and the appropriate disposal of bio-contaminants.*

**There is no resource for administrators so they were given a handout – which was in a 200+ page packet to use as a foundation for the course to have staff complete. It took me 8 hours to design the course and then another hour in a day to offer the class as an in-service for my teachers.**

* 1. **7.702.33 F** *Effective September 30, 2016, each staff member working with children less than three (3) years of age must complete a Department approved prevention of shaken baby/abusive head trauma training prior to working with children less than three (3) years of age. This training must be renewed annually and counts towards ongoing training requirements.*

**Another hour of training for staff. Another element of staff files for the director to chase down.**

* 1. **7.702.33 G** *All staff must complete a Department approved standard precautions training that meets current Occupational Safety and Health Administration (OSHA) requirements prior to working with children. This training must be renewed annually and counts towards ongoing training requirements.*

**This used to be called Universal Precautions and was included in our CPR/First Aid classes. Now we have to find another new Vendor, require another training for staff. And then make sure it is in their file.**

* 1. **7.702.33 H** *Within thirty (30) calendar days of employment and annually, all employees and regular volunteers must be trained using a Department approved training about child abuse prevention, including common symptoms and signs of child abuse.*

**Another hour of training for staff. Another element of staff files for the director to chase down.**

* 1. **7.702.33 I** *Within thirty (30) calendar days of employment and annually all employees and regular volunteers must be trained using a Department approved training on how to report, where to report and when to report suspected or known child abuse or neglect.*

**Another hour of training for staff. Another element of staff files for the director to chase down.**

* 1. **Colorado Shines –** getting staff enrolled and engaged is challenging, time consuming. Maintaining the school information also VERY time consuming.
  2. **Immunization Reporting**

1. Colorado Shines/PDIS Cross Walk
   1. AMS Accredited schools in Colorado are only crosswalked at a Level 3.
   2. Maine, Maryland, Minnesota and Georgia cross walk Montessori Accredited programs at the highest level.
   3. Why are our Montessori Accredited programs limited to Level 3?
2. **House Bill 12-1276** allows childcare centers that are subject to child care licensure regulations, including centers that are already licensed, to apply to the department of human services for waivers to use certain materials in conjunction with their curricula. Centers are required to adopt policies concerning parental notification of possible safety risks of those materials and the training of instructors in the use of those materials. The state board of human services is directed to promulgate rules concerning the criteria for denying waiver requests, as well as an appeals process for centers to utilize if their waiver request is denied.
   1. What are the rules regarding waivers? Are there expiration dates?
   2. Is there a way to make the process easier and more available?