
November 5, 2020

Montgomery County Council
Stella Werner Council Office Building
100 Maryland Ave
Rockville, MD 20850

Montgomery County Council Members:

I am an independent owner/operator of a preschool located in Gaithersburg, Maryland. My center operates under a branding license as The Goddard School in Gaithersburg. There are six Goddard Schools located within Montgomery County and each Goddard School is independently owned and operated by small business owners. My wife Jill and I have been residents of Montgomery County for 28 years and Goddard School owner/operators for the last 17 years. As with most small business owners, we've invested our lives and life savings into our business.

The purpose of this correspondence is to provide written testimony regarding the council's vote on the County Executive's proposed amendment to Executive Order 122-20. This testimony is specifically targeted to **Item 6b. Child Care**. This item states:

6b. *Childcare.* Must continue to follow the phase two childcare capacity limits that are currently in effect for all childcare providers in Montgomery County as stated in the Maryland Department of Education's June 10, 2020 Child Care Operating Procedures. All applicable Code of Maryland Regulations regarding staff-child ratio must be followed.

In short, this proposed change in Executive Order 122-20 requires child care centers to:

- Continue to operate at Phase 2 capacity levels despite the state transitioning to Phase 3
- Convert to Phase 3 (standard COMAR) staff-child ratios

Problem Statement:

In practical terms, the proposed change to the Executive Order requires centers across the county (currently operating under MSDE's June 10, 2020 Child Care Operating Procedures):

- Current Class size: 15 people (**14 students and 1 teacher**) and
- Current Staff-Child Ratio: 14:1 student to teacher ratio

to now have to operate:

- Proposed Class size: 15 people (**13 students and 2 teachers**) and
- Required Staff-Child Ratio: 10:1 student to teacher ratio (COMAR)
- Actual Staff Child Ratio: 6.5: 1

or, more practically at:

- Class size: 11 people (**10 students and 1 teacher**) and
- Required Staff-Child Ratio: 10:1 student to teacher ratio (COMAR)

Impacts of Proposed Executive Order

1. **Impact #1 - Disenrollment of Families:** The unintended impact of the proposed change is that centers across the county will have to **DISENROLL children/families** from their centers in order to comply with this proposed change. Each classroom currently operating under the 15 person max capacity limitation will have to **DISENROLL between 1-4 children PER classroom**. Depending on the size of the center, this will result in an average disenrollment of between 4 - 30 families per center.

In stark terms, approval of the proposed Executive Order would potentially **DISPLACE thousands of families** from their current child care provider with very little opportunity to find care elsewhere since every center in the county would be faced with the same problem. The potential "ripple effect" of families losing this essential service (child care) could affect everything from hospital care to county residents being able to purchase essential products (gasoline, groceries, etc.).

Finally, we ask the council, **how do you propose we select the people to disenroll?** What criteria does Montgomery County want implemented to decide which family should be denied the Essential Service of child care? This is an untenable position to place both families and child care centers in and not the position the county council should take.

2. **Impact #2 - Additional Financial Strain:** In the event that it isn't already abundantly apparent, the child care industry has been significantly impacted by the state and county mandated changes associated with COVID-19. The 540 Goddard Schools operating across the nation are operating at an average occupancy that is 30% below pre-COVID levels which is consistent across the entire industry. This is below an operational "break even" point so every month centers across the county, state and nation struggle to make payroll, rent, utilities, etc. and fail to do so. The National Association for the Education of Young Children (NAEYC) predicts that 30% of centers nationwide will be forced into bankruptcy in the coming months of time.

Without intervention, centers across the county will not survive this pandemic. This Executive Order **hastens this process**. If not amended, centers will be forced to:

- Reduce Enrollment/Revenue (see #1 above) AND
- Add Staff (Cost)

This hastens the financial insecurity/instability of this industry. It's a formula for failure.

What Are the Facts? What is Happening in Child Care?

It is important to look at fact-based information. The facts are, child care centers are NOT nursing homes. In fact, the data overwhelmingly demonstrates that child care centers are operating nationwide under normal licensing constraints and are NOT contributing to the spread of COVID-19. Young children are the least vulnerable of the population and the case rate within this population is very, very low.

1. **10 Month Operational Period:** Starting in February 2020, and throughout this pandemic, we have never closed our doors. Immediately upon Governor Hogan issuing the "Stay At Home" order, we immediately reopened under a state license as an Emergency Personnel Child Care (EPCC) Center. We have operated through the absolute worst period of this pandemic because we felt that it was our duty to serve the doctors, nurses, police, firefighters and, yes, the grocery store personnel who we all counted on when the COVID case load was at its worse. We are classified as Essential Personnel and, at significant financial loss, we stayed open to ensure our community had the essential services necessary to survive the initial and worst period of the pandemic.

2. **Zero COVID Cases Amongst Children:** Starting February 2020 we are now entering our 10th month of operation without a child reported case of COVID-19. Throughout this period, we have had one, part time teacher report positive to COVID-19 but, as a result of the numerous safety protocols we've implemented, there was no spread within our School. Over the last 90 days, we've had 0 cases of COVID-19.
3. **Nation-wide Goddard School Data:** Goddard Schools operate nationally in virtually every state in the USA. There are 540 schools currently operating nationwide. Most have operated continuously throughout this crisis when the state and local governments have permitted it. Currently, all 540 Goddard Schools are operational. Overwhelmingly, these schools are operating under their normal, state licensing standards. **Over this span of time, the national rate of COVID-19 cases across faculty and students is 0.59% as a percentage of all enrollments.** There has been 100% recovery and 0 fatalities. The evidence is abundantly clear that child care centers nationwide are operating under normal licensing constraints and are NOT contributing to the spread of COVID-19.
4. **State-wide Data:** As described in Dr. Salmon, PHD, State Superintendent of Schools, in her October 1, 2020 announcement, "When the capacity limit for child care programs was increased in June from 10 to 15 individuals per room, the state did not see a spike in cases within child care programs, even as more providers reopened their facilities."
5. **Increased Safety Protocols:** We have implemented extensive health and safety protocols across all aspects of our operations to minimize health risks:
 - **Pick-Up/Drop Off:** To minimize exposure, parents are not permitted entry into the school
 - **Wellness Checks:** We conduct daily wellness checks including temperature measurements and health screening questions for:
 - All Faculty and Administration.
 - Every Student
 - Every Parent/Guardian dropping off their child as a secondary measure of family wellness.
 - **Faculty Masks:** Every adult (faculty member or administrator) inside the building wears a face covering throughout the day.
 - **Student Masks:** All students over two years of age are asked to wear face coverings
 - **Parent Masks:** Every parent/guardian who comes to drop off/pick up their child is required to have on a face covering.
 - **Social Distancing:** The 6' social distancing objective is strictly followed by parents/guardians at pick up/drop off time and is practiced within the classroom throughout the day.
 - **"Pod" Operations:** Each classroom in the building is set up as an independent operating center and *does not mix* with other classrooms. This "pod" concept ensures isolation of any possible illnesses (including COVID-19) that might be introduced into the School. It's an effective deterrent to possible spread.
 - **Hand Washing:** Already an extremely rigorous process within our school, we have increased hand washing protocols such that, on average, a child's hands are washed every 20 minutes throughout the day. This is consistent with Faculty hand washing as well.
 - **Daily Sanitizing Protocols:** We are cleaning and sanitizing all classroom manipulatives throughout the day with special attention being paid to high

touch point areas. A professional cleaning company cleans the building every evening (after hours).

- Deep Sanitizing Protocols: We have invested tens of thousands of dollars in special "deep cleaning" equipment. We utilize a Halo Disinfection machine on a weekly basis (or as needed) which uses an FDA approved, hydrogen peroxide based, mist to provide 100% coverage of all operating space within our building. This hydrogen peroxide based disinfectant is designed to kill viruses, including COVID-19, on contact.
- Onsite School Tours: All onsite tours of our program and facilities have been eliminated and replaced with virtual tours.
- Special Visitors/Programs: We have eliminated all on-site special visitors and programming.

6. **Additional Risk of Not Returning To COMAR standards**: As described in Dr. Salmon's October 1, 2020 announcement, by returning to COMAR standards, it will "hopefully assist in limiting the many unregulated and illegal child care operators that have sprung up in recent months such as "pandemic pods", where there are no criminal background checks, no oversight, and parents cannot be sure that their children are in a safe environment."

Proposed Alternative

The alternative to the current Executive Order, Item 6b., is to take the exact same action being taken state-wide. Child care should be returned to operating at the COMAR standards as they relate to both group size and staff-child ratio. This is an action which the county council can take on its own and, given the overwhelming data supporting this action, is the logical step to take. Hence, we propose the following amendment to Item 6b:

6b. *Childcare.* Consistent with the Maryland State Department of Education announcement dated October 1, 2020, all centers will return to the full teacher to child ratios and capacities for which they are licensed and will do so no later than November 30, 2020.

Summary

We can all agree that we want to operate safely and not put children or staff at an unnecessary risk. The infection rate, health and safety protocols, serving our community and maintaining the financial health of child care centers must be taken most into account when deciding the fate of this decision. We believe the many factors reviewed above justify why Montgomery County preschools be allowed to return to COMAR standards with respect to room size and staff-child ratios. We ask that the change proposed above to **Section 6b. Childcare** be adapted.

We'd like to thank you in advance for this consideration!



Jill & Jim Worley
The Goddard School in Gaithersburg

cc: Members of Montgomery County Council
Marc Elrich, Montgomery County Executive
Governor Larry Hogan
Dr. Karen B. Salmon - State Superintendent of Schools

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