



# Priority Evaluation: Early Childhood Programs

Report: 21-265-02



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# LOFT Oversight Committee

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**Key Objectives:**

- Provide an overview of all publicly funded early childhood programs
- Identify the goals and measurable performance outcomes of programs
- Establish coordination among programs
- Determine effectiveness of early childhood programs, how outcomes are measured, and whether there are sustained benefits.

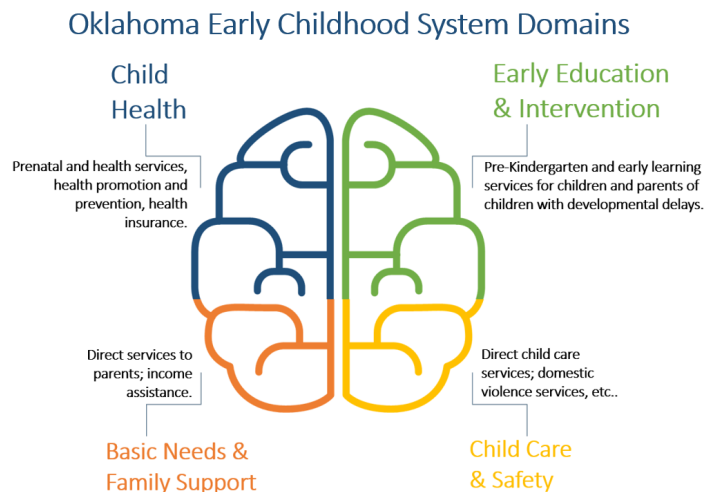
**Executive Summary**

States invest in early childhood education and services for the purpose of establishing a strong developmental foundation from which lifelong learning can occur.

The time between a child's birth and when they turn five years of age is a period of rapid brain development and learning. Research has established the long-term societal benefits of high-quality early childhood programs, as well as short-and-long-term educational benefits, including enhanced educational attainment and reduced special education costs.

As early childhood education programs seek to advance the development of children, the services provided are inextricably interwoven with those within the scope of health and human services.

With this evaluation, the Legislative Office of Fiscal Transparency (LOFT) sought to provide both clarity and understanding to Oklahoma's early childhood ecosystem by creating a fiscal framework to identify all stakeholders, assess collective State and programmatic efforts, and to examine whether the current funding strategy is effective in providing early childhood-centric services. In doing so, LOFT identified four domains across which services are provided:



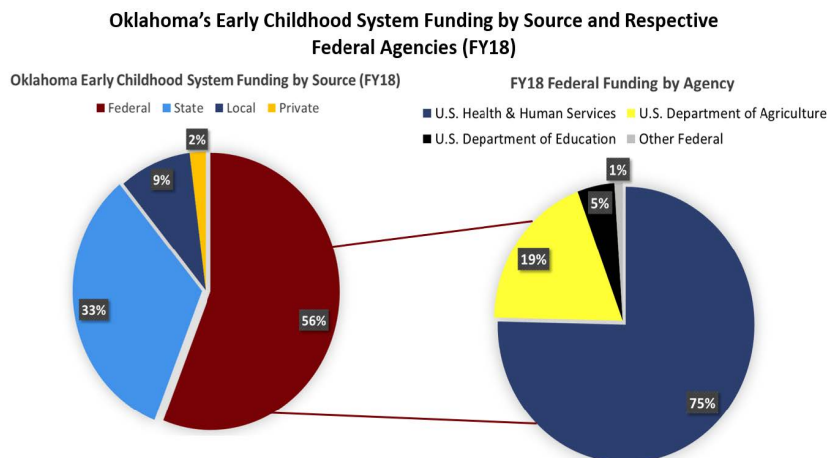
Source: Legislative Office of Fiscal Transparency's creation.

LOFT's evaluation of these domains resulted in four key findings:

## Finding 1: Early Childhood is Not an Education-Driven System.

In FY18, 19 different early childhood programs were funded through five State agencies at a cost of \$1.6 billion; 30 percent of which was allocated for education initiatives.

In FY18, federal spending accounted for 56 percent of all revenue supporting Oklahoma’s early childhood system, yet just five percent of federal funds are from the U.S. Department of Education (USDE). LOFT’s analysis revealed just 18 percent of federal funding is allocated toward education-centric childhood programs.

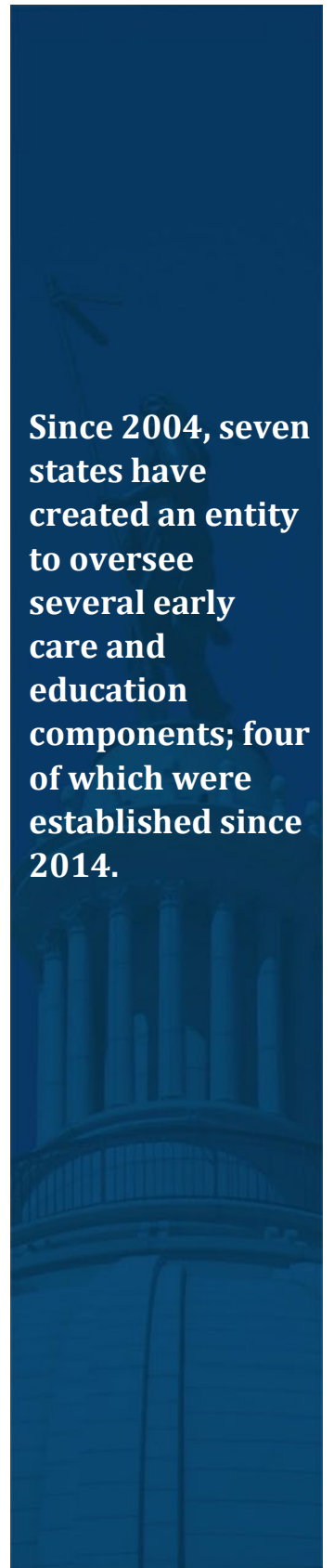


Source: Legislative Office of Fiscal Transparency’s analysis based on data from OPSR, Appropriation Reports and Agency Records.

LOFT found that at both the federal and state level, funding and programs are more concentrated toward health and human services programs than early education programs. The funding analysis also revealed that total funding for the State’s early childhood system has increased despite a consistent decline in the State’s population of children under the age of five.

While federal funding is the largest revenue source for early childhood programs, (nearly 60 percent), the State’s investment in early childhood is increasing at a faster rate than the federal investment. However, the State’s decentralized early childhood system makes it challenging to align strategic goals and outcomes across the different agencies and programs receiving state funds. For example, five early childhood agencies report to between three and four different committees within the legislative appropriation and budgeting process.

Since 2004, seven states have created an entity to oversee several early care and education components; four of which were established since 2014.



**Key Metrics:**

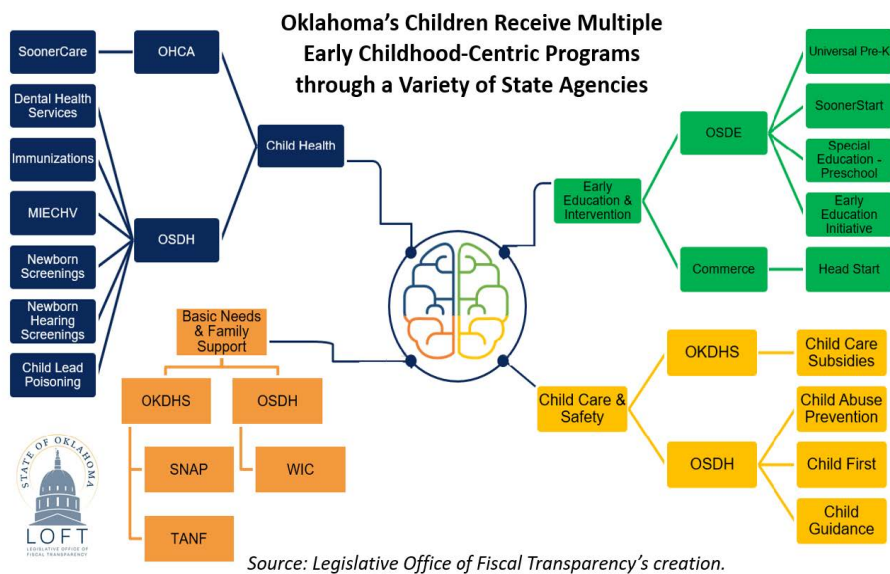
**In FY18, approximately 40 thousand children were enrolled in the State’s Universal Pre-K program.**

**In FY18, Oklahoma’s Pre-K funding per pupil was nearly four times higher than Florida, another state which provides universal preschool.**

**In FY20, Oklahoma had the ninth highest funding Pre-K funding per pupil in the nation.**

## Finding 2: Oklahoma Has Opportunities to Streamline Early Childhood Investments and Improve Efficiencies Through a Unified State Strategy.

Each of the varied early childhood education (ECE) programs provided by the State has its own standards, governance structure, and targeted demographic. Individual families and children can participate in multiple programs – sometimes simultaneously - and providers can blend resources from multiple revenue streams including state, federal and private resources. The overlap of services across various agencies targeting similar demographics creates the potential for duplication of services as well as uncoordinated services to families.



The State’s current mixed delivery system creates an expanding web of vision, goals and objectives for specific programs and targeted populations – with little attention given to the high potential of duplication of services or collaboration. This is not a challenge unique to Oklahoma. Several states have recently addressed inefficiencies and challenges with their respective early childhood systems by adapting their governance structures. Most recently, Colorado and New Mexico have created independent state agencies to centralize decision making, coordinate strategic goals and to streamline funding for early childhood-centric services and programs.

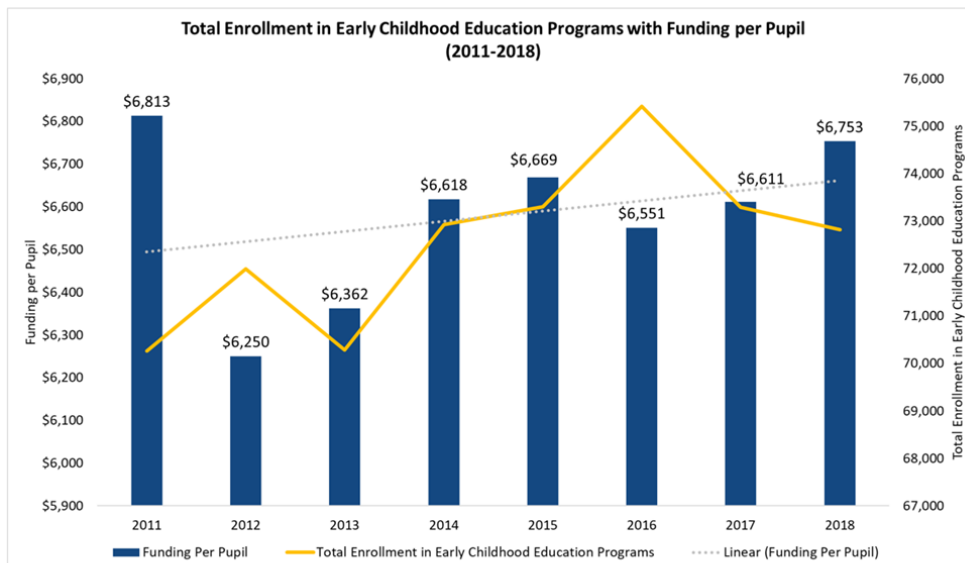
### Finding 3: Oklahoma’s Fragmented Funding Approach to Early Childhood Limits Accountability and Effectiveness.

With this finding, LOFT examined programs and services within the educational domain of the State’s early childhood system; those whose primary mission is to improve school readiness and the cognitive abilities of young children.

Operating early childhood education programs across different agencies that use varied funding streams creates challenges regarding administration, accountability, and consistency of data, as there are often separate requirements regarding allowable expenses, reporting, data collection and recipient eligibility. Currently, **program accountability is tied to the source of funds, an agency-centric administrative approach as opposed to child-centric.**

Likewise, decentralization makes it difficult for families to navigate the system or be aware of all programs and services for which they qualify.


State, Federal and local funds combine in nearly equal parts to fund the education programs within the scope of early childhood. LOFT determined the **funding** per pupil, inclusive of all revenue sources, for early childhood education programs was \$6,753 in FY18, with the State providing services to more than 72,817 unduplicated children aged birth through 5. The largest program by enrollment was the State’s Universal Pre-K program, which served nearly 40,000 children in 2018.



Source: Legislative Office of Fiscal Transparency’s analysis based on data from OPSR, Head Start and OSDE.  
 Note: Funding per pupil dropped in 2012 and 2013 due to a decline in federal funding for early childhood education programs.

#### Key Metrics:

- On average, 40 percent of Oklahoma third grade students begin the school year with at-risk reading sufficiency rates; a five percent increase from kindergarten.
- In FY20, 44 percent of all Oklahoma kindergarten through third grade students had an at-risk reading sufficiency rate.



#### **Finding 4: Lack of Data Limits the State’s Ability to Assess Investments and Outcomes into Early Childhood Education.**

Early childhood data is currently compartmentalized in different state agencies with separate source systems; moreover, much of this information is highly sensitive, requiring rigorous data governance, management, and oversight. Having the capacity to share information across State agencies on the same targeted population is critical to identifying and addressing the underlying factors for a student’s academic performance.

While there are some examples of data sharing and collaboration, most of Oklahoma’s early childhood programs and services remain siloed. The resulting lack of comprehensive data limits the ability of policymakers to assess early childhood investments and performance outcomes. Despite having both federal data collection and reporting requirements for many of the early childhood education programs, no in-depth assessment has been conducted to determine the impact or return on investment for the State’s early childhood education programs.

LOFT’s research found that other states have completed performance-based assessments on their respective prekindergarten programs that analyze academic outcomes, inform stakeholders and identify return on investments. New Mexico and Alabama are two examples of states that have been able to provide state leaders timely, accessible information from which to make data-driven decisions.




## Summary of Policy Considerations and Agency Recommendations

The Oklahoma State Legislature and agencies may consider the following:

### Policy Considerations

- The Legislature may consider creating a dedicated appropriations committee with a central focus on all early childhood agencies and programs.
- The Legislature may consider restructuring Oklahoma's early childhood education system within an existing state agency focused on enhancing the development of children's early education. Potential agencies include the Office of Educational Quality and Accountability, the Oklahoma State Department of Education, the Oklahoma Department of Human Services and the Oklahoma State Department of Health. Additional options include building on the existing Oklahoma Partnership for School Readiness or the Oklahoma Commission on Children and Youth under the Oklahoma Department of Human Services.
- The Legislature may consider creating an independent state agency or repurposing an existing governmental entity with the authority to create and execute a statewide strategy for improving the health, wellness, and early development of Oklahoma children.
- The Legislature may consider amending O.S. 70 § 13-122 to add the Oklahoma Partnership for School Readiness to the Interagency Coordinating Council.
- The Legislature may consider requiring the production of a comprehensive annual report about early childhood education-centric programs to include all state, federal and private resources utilized by agencies, programs, services, and targeted populations. If a comprehensive annual report is adopted, the Legislature may further consider eliminating existing reporting requirements for similar data this is currently submitted separately by agencies.
- The Legislature may consider requiring the development of a coordinated funding strategy across all state agencies supporting early childhood education.



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- The Legislature may consider restructuring Head Start within an existing state agency focused on enhancing the development of children’s early education for better alignment of agency mission and early childhood objectives. Options include the Oklahoma State Department of Education, Oklahoma Department of Human Services and the Department of Health. Additional options include building on the existing Oklahoma Partnership for School Readiness or the Oklahoma Commission on Children and Youth under the Oklahoma Department of Human Services.
  - The Legislature may consider requiring future analysis of funding per pupil from all sources of revenue in addition to all funds expended to provide an accurate reflection of financial inflows and outflows supporting early childhood education.

### **Agency Recommendations**

- The Oklahoma State Department of Education should fulfill the statutory requirements provided for in O.S. 70 § 13-124 by submitting a joint funding plan for SoonerStart.
- The Oklahoma State Department of Education should produce a comprehensive annual report on all early childhood education-centric programs and services provided, to include all revenue sources, state and community partners for delivery of services and targeted populations served.
- The Oklahoma State Department of Education should establish a review schedule for the independent evaluation of the quality, efficacy, costs, and educational outcomes of early childhood education-centric programs and services provided. The results of any evaluations should be made publicly available.
- The Oklahoma State Department of Education, or lead agency designate, should compile a comprehensive list of early childhood resources within the State to distribute to school districts, parents, and other stakeholders.

- The Oklahoma State Department of Education should work to improve the quality, quantity, and transparency of data for Pre-K metrics to allow for more targeted analysis and investments.
- The Oklahoma State Department of Education should conduct, or contract with a research institution to conduct, a performance evaluation of the State's entire Universal Pre-K program to determine the program's impact on academic success for students and return on investment for the State.
- The Oklahoma State Department of Education should develop an intake questionnaire from families with children entering Pre-K to determine what early childhood services students have received prior to entering Pre-K.
- The Oklahoma State Department of Education should collaborate further with the Oklahoma Partnership for School Readiness and other state agencies to develop and present a plan to the State Legislature for an Early Childhood Integrated Data System.





## Introduction

High-quality early childhood education (ECE) is considered a foundational component of a child’s development, growth and wellbeing. Between birth and age 5, hereafter referred to as B-5 — particularly in the infant and toddler years—children experience rapid brain development, learn language, build neural networks, and create secure attachments to their caregivers.<sup>1</sup> This window of child development has been determined a critical juncture to achieving long-term health, educational attainment, and a productive society. Decades of robust empirical research and literature on ECE illustrate that high-quality early childhood programs can provide emotional, mental and social benefits for children and youth. High-quality ECE programs improve short-term performance in language, literacy, and math in addition to offering long-term societal benefits such as avoidance of teen pregnancy, reduced crime, gains in life-cycle labor income, reduced special education costs and enhanced educational attainment.<sup>2</sup>

As early childhood education programs seek to advance the development of children, the services provided are inextricably interwoven with those within the scope of health and human services.

## Early Childhood Governance Structures

States vary in their approach to identifying, governing, funding, and delivering early childhood services. Across the country, these numerous programs and services are housed within various state agencies, including Education, Human Services, Health, Mental Health and others.<sup>3</sup>

LOFT’s evaluation of peer states identified three common governance structures for early childhood services:

- **Consolidation:** A stand-alone agency that houses all programs related to early childhood
- **Creation of Independent State Agency:** A singular administrative body that oversees all programs, services and resources related to early childhood
- **Coordination (Mixed Delivery System):** Coordination of services among multiple state agencies through partnerships and service agreements

<sup>1</sup> [OKFutures Needs Assessment \(okschoollreadiness.org\)](http://okschoollreadiness.org)

<sup>2</sup> [THE LIFE-CYCLE BENEFITS OF AN INFLUENTIAL EARLY CHILDHOOD PROGRAM](#) (Garcia, 2016)

<sup>3</sup> Please refer to Appendix C for a detailed list of all stakeholders LOFT connected with for this evaluation.

These governance structures are detailed in Finding 2. Oklahoma’s current early childhood system is operated under a coordinated governance structure, in which multiple agencies, utilizing multiple funding streams, are providing services to the same targeted population of families and children. This model is also referred to at the Federal level as a mixed delivery system, where early childhood education services are delivered through a combination of programs, providers, and settings; and that is supported with a combination of public and private funds.<sup>4</sup>



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<sup>4</sup> [Title IX - SEC. 9212. PRESCHOOL DEVELOPMENT GRANTS — Every Student Succeeds Act \(ESSA\) Title IX, § 9212 \(42 USC 9831\)](#)

# Finding 1: Early Childhood is Not an Education-Driven System.

## Targeted Populations for Early Childhood

Children aged five or younger comprise eight percent of Oklahoma’s population. As depicted in Table 01, many of the 302,792 children<sup>5</sup> within this group face considerable challenges that can affect readiness to learn. These factors support adoption of a holistic approach regarding supporting child development rather than an agency-centric model.

*Table 01: Hardships and Challenges Facing Oklahoma Children Birth through 5-Years Old. (This table illustrates various statistics related to the health, education, and wellbeing of Oklahoma’s children under 5-years old.)*

Early Childhood Vital Statistics Comparisons									
	Health					Education		Economics	
	Children Prenatal to Age 3 Not Receiving Developmental Screenings	% of Households with at Least One Child under Age 3 Classified as Food Insecure	Children Born with Low Birth Weight	Children Without Health Insurance	Infant Mortality Rate	Kindergartners with At-Risk Reading Sufficiency Rates	% of Children under Age 3 Whose Family Did Not Read to them Daily	Children Prenatal to Age 3 Without any Parent Working Full-Time	% of Children under Age 3 Living in Households with Incomes Below 100% of the Federal Poverty Level
United States	62%	7.2%	8.30%	5.20%	5.70%	N/A	62.80%	26.30%	19.50%
Oklahoma	63.40%	12.6%	8.30%	8.20%	7.10%	33%	61.30%	26.20%	23.50%
Oklahoma's National Ranking	31st	50th	26th	46th	46th	N/A	29th	26th	41st

Source: Legislative Office of Fiscal Transparency's analysis based on data from Prenatal-to-3 Policy Impact Center, OK Depts. Of Education and Health, CDC, and Georgetown University Health Policy Institute.

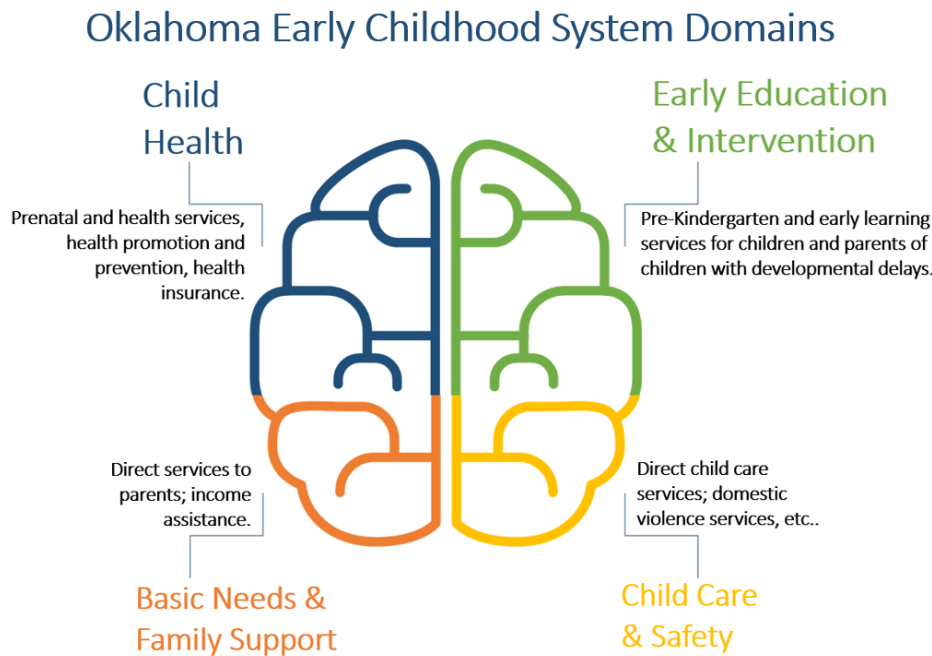
## Early Childhood Domains

The State’s mixed delivery system can be grouped into four domains, categorized by the demographic served and the services provided, as shown in Figure 01.<sup>6</sup> These four domains encompass the diverse set of programs and services offered within Oklahoma for early childhood.

<sup>5</sup> [OPSR SFY2020 Annual Report Final.pdf \(okschoolreadiness.org\)](https://www.okschoolreadiness.org/OPSR-SFY2020-Annual-Report-Final.pdf)

<sup>6</sup> Through background research, discussions with national and peer legislative groups, and collection of inventory data, an organizing framework emerged for LOFT to categorize early childhood services based on services provided.

Figure 01: Oklahoma Early Childhood System Domains. (This infographic illustrates four potential domains for categorization of early childhood programs, based on type of services provided.)



Source: Legislative Office of Fiscal Transparency's creation.

## Oklahoma Early Childhood Funding Overview

Oklahoma's early childhood system consists of multiple funding streams at the federal, state and local levels. In FY18 (the latest year with complete information available), over \$1.6 billion in combined revenue sources funded Oklahoma's system of early childhood programs (see Table 2 below for details).

The scope of this evaluation is to provide both clarity and understanding to Oklahoma's early childhood ecosystem by creating a fiscal framework to identify all stakeholders, assess collective State and programmatic efforts, and to examine whether the current funding strategy is effective in providing early childhood-centric services.

The State's early childhood mixed delivery system can be grouped into four domains, categorized by the demographic served and the services provided.

In FY18, over \$1.6 billion in combined revenue sources funded Oklahoma's system of early childhood programs.

Table 02: Oklahoma Early Childhood System Funding Sources (FY18). (This table provides a brief description of all revenue sources allocated to support early childhood programs and services.)

Oklahoma Early Childhood System Funding Sources (FY18)		
Funding Source	FY18 Total Funding	Brief Description
Federal	\$897,615,749	Federal allocations and grants for specific early childhood programs generated from specific government formulas.
State	\$539,708,219	State appropriations allocated from the State Legislature to agencies for administration and delivery of services of early childhood programs.
Local	\$144,314,973	Funding allocated from County Health Departments and from a variety of other revenue sources generated locally and available for a school district to use (i.e., Ad Valorem Tax, County 4 Mill Tax, Private Donations)
Private	\$34,283,582	Funding received from various nonprofit organizations and other private donors.

Source: Legislative Office of Fiscal Transparency's analysis based on information from OPSR and OSDE

Though local funds are not directly appropriated from the State, these funds are public funds subsidized by Oklahoma taxpayers.

In FY18, federal spending accounted for 56 percent of all revenue supporting Oklahoma's early childhood system.<sup>7</sup> As illustrated in Chart 01, **only five percent of all federal funding comes from the U.S. Department of Education (USDE)**. While other federal funding outside the USDE provides funding for early education and intervention programs, **LOFT's analysis revealed just 18 percent of federal funding is allocated toward education-centric childhood programs**.

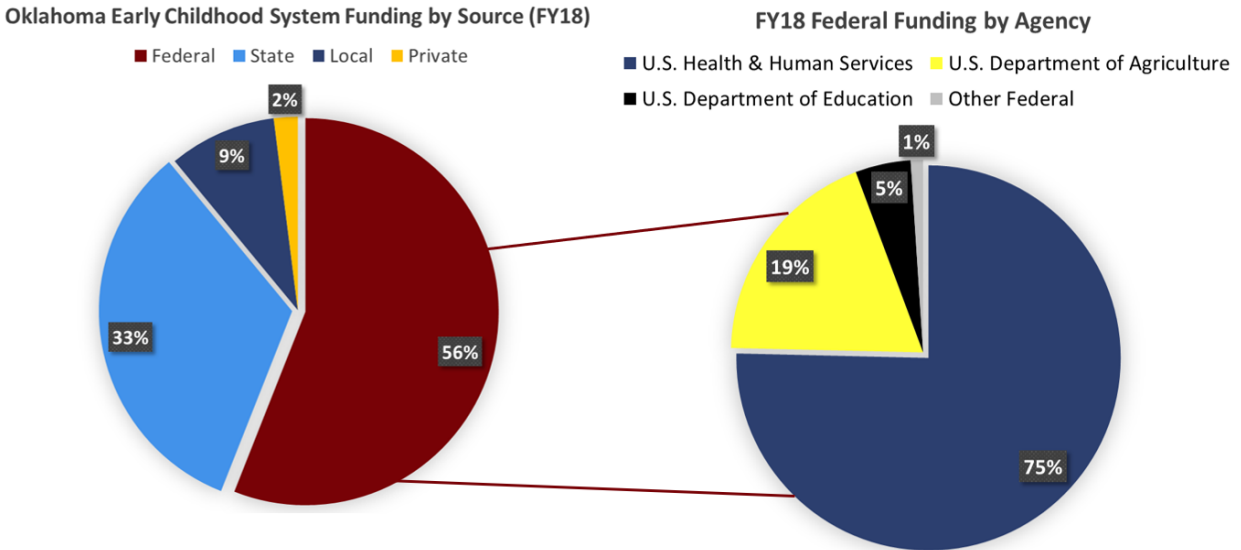
The largest component of federal funding (75 percent) was from the U.S. Department of Health and Human Services, specifically, funds allocated for Medicaid (SoonerCare) and Head Start. Other significant federal funding streams were for Supplemental Nutrition Assistance Program (SNAP) food assistance, Temporary Assistance for Needy Families (TANF) and Child Care and Development Fund (CCDF) grants for the Oklahoma Department of Human Services (OKDHS) childcare subsidies.

<sup>7</sup> In 2018, the United States invested less than 0.5 percent of the GDP on childcare and early childhood education programs. [OCED \(2018\)](#)



*Chart 01: Oklahoma Early Childhood System Funding by Source and Respective Federal Agencies (FY18). (This pie chart illustrates that federal funding accounts for the largest source of funding for early childhood programs, with the only five percent of the total federal funding coming from the U.S. Department of Education.)*

**Oklahoma’s Early Childhood System Funding by Source and Respective Federal Agencies (FY18)**

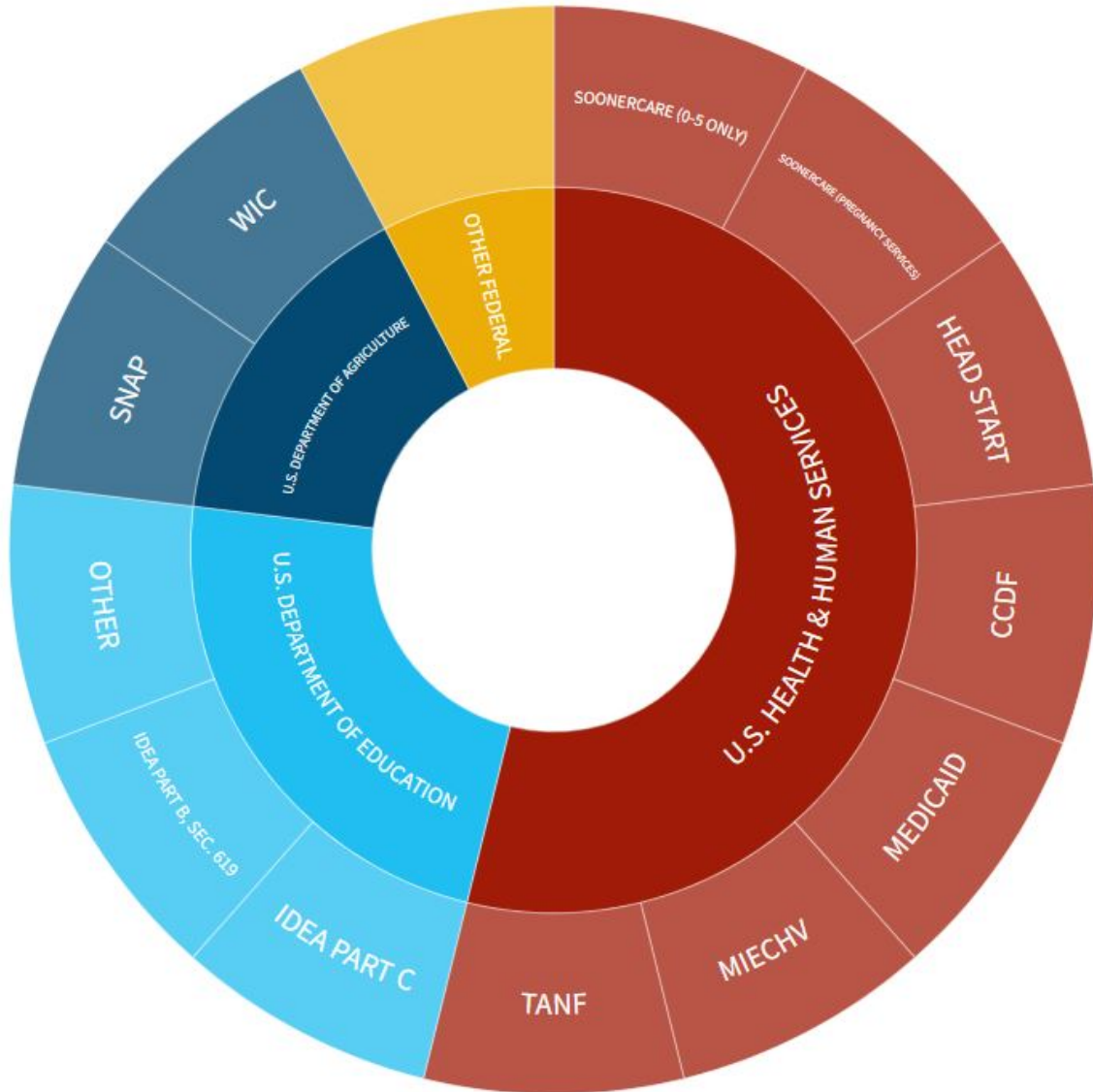


Source: Legislative Office of Fiscal Transparency’s analysis based on data from OPSR, Appropriation Reports and Agency Records.

As referenced in Chart 02 below, additional federal funding is received from the U.S. Department of Agriculture (USDA). Federal funding from USDA accounted for roughly twenty percent of all federal funding supporting early childhood programs in FY18. Funding from USDA was for both Supplemental Nutrition Assistance Program (SNAP) and the supplemental nutrition program for Women, Infant, and Children (WIC).

Chart 02: Early Childhood Federal Funding by Agency and Program (FY18). (This sunburst illustrates the number of Oklahoma early childhood-centric programs and services receiving federal funding from the U.S. Department of Health and Human Services; indicating a strong relationship between health and human services and the State's early childhood system.)

**Early Childhood Federal Funding by Agency and Program (FY18)**



Source: Legislative Office of Fiscal Transparency's analysis based on data from OPSR, Appropriation Reports and Agency Records

## Early Childhood Funding by Domain

**In FY18, Taxpayers Funded 19 Different Early Childhood Programs Through 5 State Agencies at a Cost of \$1.6 Billion; 31 percent of Which was Allocated for Education Initiatives.**

The State administered 19 early childhood programs for FY18, delivering a variety of health, social and educational services, several of which are targeted to disadvantaged youth.<sup>8</sup> Table 03 below illustrates the number of programs and total investment into these primary domains. As shown in Table 03, child health accounted for 52 percent of FY18 spending, from all sources, for early childhood programs in Oklahoma. Early education and intervention accounted for 31 percent of all spending in the State for early childhood, at approximately \$491 million.

*Table 03: Four Primary Domains of Oklahoma's Early Childhood System. (This table illustrates four domains used to categorize the State's nineteen early childhood programs and services, inclusive of all FY18 funding sources. Funds represented include federal, state appropriations, local and private funding.)*

Domain	Description	Number of Programs	State Agencies	FY18 Funding from All Sources	Percent of FY18 Funding Dedicated to Domain
Child Health	Prenatal and dental services; health insurance; health promotion and prevention	7	OHCA & OSDH	\$840,261,434	52%
Early Education & Intervention	Direct prekindergarten and services for children and parents of children with developmental delays	5	OSDE, Commerce & OSDH	\$491,730,623	31%
Basic Needs & Family Support	Direct services for parents; income assistance	3	OSDH & OKDHS	\$196,886,288	12%
Child Care & Safety	Direct child care; domestic violence services	4	OSDH & OKDHS	\$87,044,178	5%
<b>Total</b>		<b>19</b>	<b>5</b>	<b>\$1,615,922,523</b>	<b>100%</b>

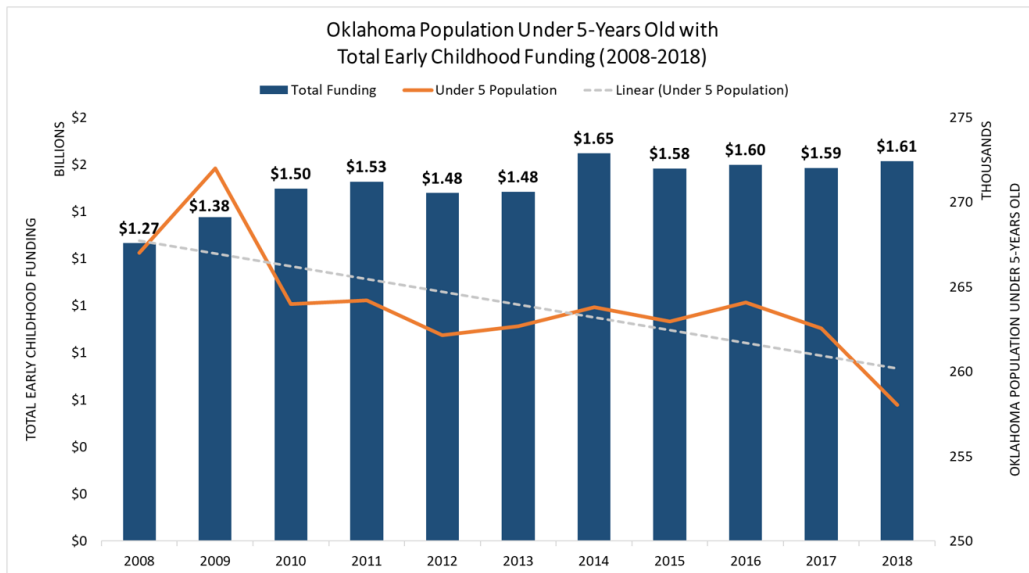
Source: Legislative Office of Fiscal Transparency's analysis based on data from OSDE and OPSR.

## Early Childhood Funding Trends

LOFT's analysis revealed that total funding for the State's early childhood system has increased despite a consistent decline in the State's population of children under 5-years old. **From FY08-18, the under 5-year-old population decreased by three percent**, with 2018 representing the lowest population rate of this age group in more than a decade. During the same period, total funding for the State's early childhood system increased 29 percent. **Total funding per child under 5-years of age increased from \$4,739 in FY08 to a record \$6,262 in FY18; a 32 percent increase.**

<sup>8</sup> See Appendix U for a complete list of the 19 programs identified by LOFT.

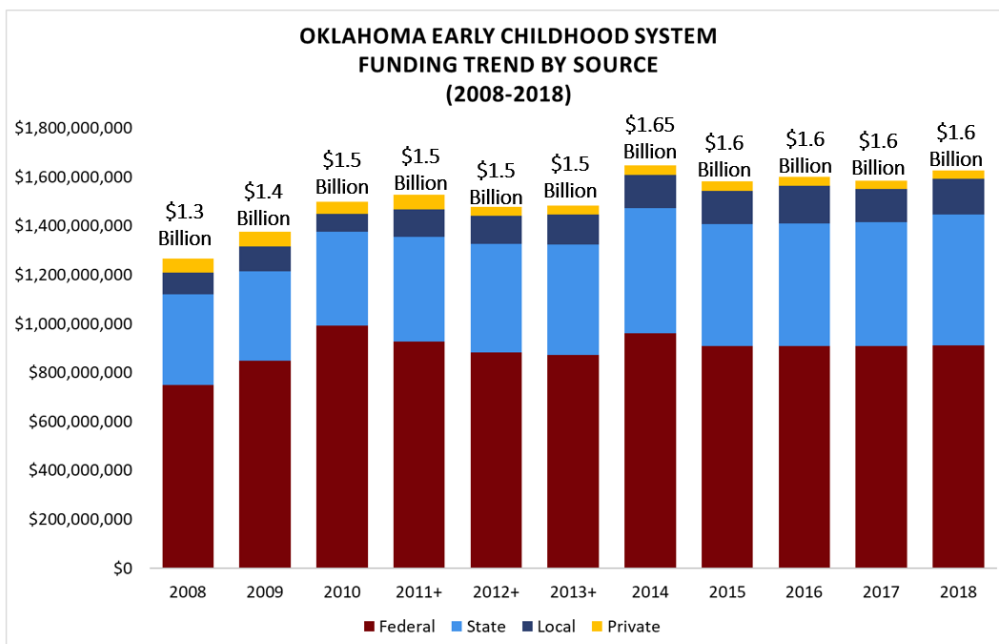
**Chart 03: Oklahoma Population under 5-Years Old with Total Early Childhood Funding (2008-2018).** (This chart illustrates that despite a linear decline in the State’s under 5-years old population, total early childhood funding has continued to increase.)



Source: Legislative Office of Fiscal Transparency’s analysis based on data from OPSR and U.S. Census Bureau.

Between 2008 and 2018, the State’s early childhood system received, on average, \$1.5 billion in annual funding. The largest source of revenue is federal grants, followed by state investments. Local and private funds contribute minimally.

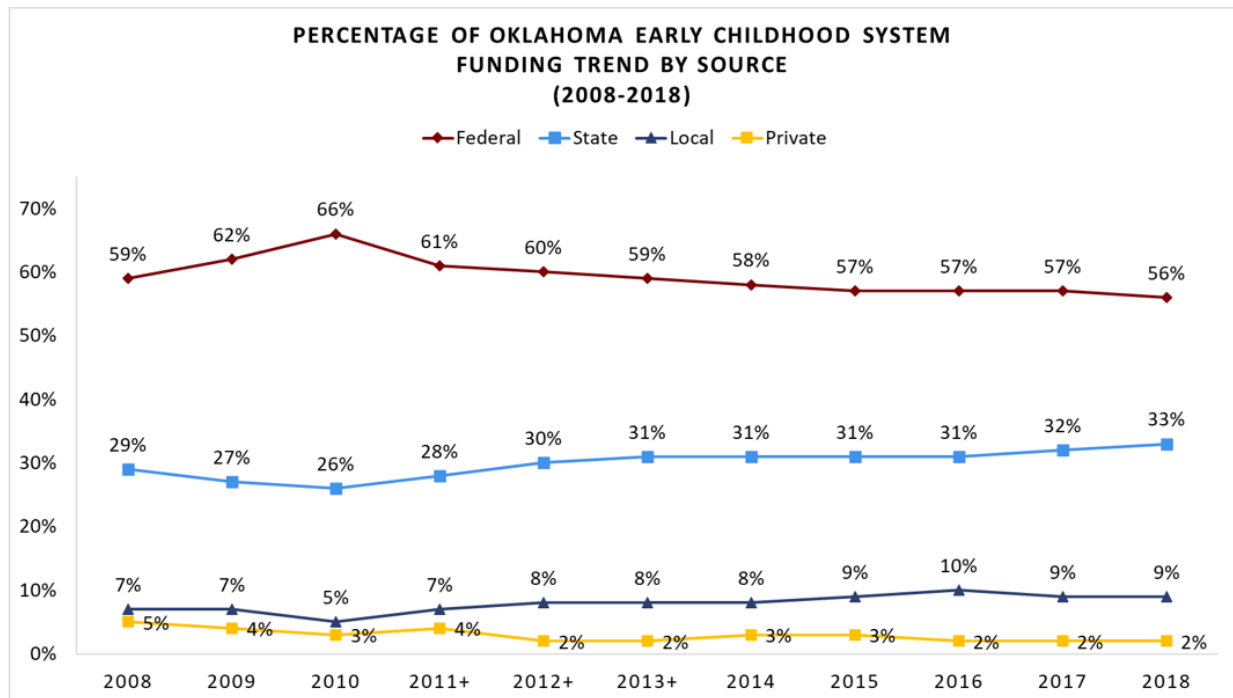
**Chart 04: Oklahoma Early Childhood System Funding by Source (2008-2018).** (This chart illustrates the composition of early childhood funding in Oklahoma by revenue source over the last ten fiscal years, reflecting an increase in overall spending for early childhood.)



Source: Legislative Office of Fiscal Transparency’s analysis based on data from OPSR, Appropriation Reports and Agency Records.  
 Note: + indicates data is not available for the Oklahoma State Department of Health programs for this year, understating total cost by \$40 million, approximately 75% of which were State funds and 25% of which were Federal resources.

Between 2008 and 2018, on average, State appropriations accounted for 30 percent of the total revenue supporting the State’s early childhood system and federal spending accounted for nearly 60 percent. **LOFT’s analysis finds that the State’s investment for early childhood has outpaced federal funding, despite increased federal funding.** During the same period, total federal funding for early childhood increased approximately 25 percent, state appropriations increased by 46 percent, and local funding increased by 62 percent. Private funding decreased by 12 percent. Of note, some federally funded programs experienced reduced funding during specific years; however, all federal programs are above 2008 funding levels by a minimum of 8 percent, with the only exception being Title 2 funding within the ‘Every Student Succeeds Act’ (ESSA).

Chart 05: Percentage of Oklahoma Early Childhood System Funding Trends by Source (2008-2018). (This line chart illustrates the composition of early childhood funding in Oklahoma by revenue source over the last ten fiscal years, demonstrating the State’s increase in overall spending for early childhood has outpaced federal funding.)



Source: Legislative Office of Fiscal Transparency’s analysis based on data from OPSR, Appropriation Reports and Agency Records.  
 Note: + indicates data is not available for the Oklahoma State Department of Health programs for this year, understating total cost by \$40 million, approximately 75% of which were State funds and 25% of which were Federal resources.

As noted in Chart 05, **since 2010, the State’s investment in early childhood is rising at a faster rate than the federal investment.** In 2010, State funds constituted 26 percent of total revenue for early childhood programs; by 2018 the State’s percentage of funding accounted for 33 percent of all funding for early childhood.

## Oklahoma Early Childhood Appropriations Framework

In Oklahoma, there are five state agencies with key roles in the State’s delivery of early childhood services: the Oklahoma State Department of Education (OSDE), the Oklahoma Department of Human Services (OKDHS), the Oklahoma State Department of Health (OSDH), the Oklahoma Health Care Authority (OHCA) and the Oklahoma Department of Commerce.<sup>9</sup> Chart 06 illustrates the complexity of the State’s early childhood system, with agencies providing multiple programs in different domains for the same children.<sup>10</sup>

Chart 06: Oklahoma Early Childhood Programs by Agency (FY18). (This sunburst chart illustrates the complexity of the State’s early childhood system, providing multiple services for different purposes through different agencies for the same targeted population.)

**Oklahoma Early Childhood Programs by Agency (FY18)**



Source: Legislative Office of Fiscal Transparency's analysis and creation.

<sup>9</sup> Please refer to Appendix F for Oklahoma’s Early Childhood System Governance Structure

<sup>10</sup> Please refer to Appendix U for a list of the 19 early childhood programs.

Oklahoma's decentralized and fragmented early childhood system presents challenges in aligning strategic goals and outcomes across different agencies and programs. For example, under the State's mixed delivery system, five early childhood agencies report to between three and four different committees within the legislative appropriation and budgeting process (detailed below in Tables 04 and 05).<sup>11</sup>

*Table 04: House Appropriations Subcommittee Fiscal Framework for Oklahoma's Early Childhood System (FY18). (This table illustrates the fiscal framework of Oklahoma's early childhood education system as programs receive funding from different agencies reporting to different appropriation committees within the Oklahoma State Legislature.)*

The 19 Programs for Oklahoma Early Childhood Were Operated by Five State Agencies that Reported to Four House Appropriations Subcommittees in the 2018 Session.							
Appropriations Committee	Agency	Child Health	Early Education & Intervention	Basic Needs & Family Support	Child Care & Safety	Total Number of Early Childhood Programs	FY18 State Appropriations
Education	Oklahoma State Department of Education		4			4	\$171,193,977
<b>Subcommittee Subtotal</b>						<b>4</b>	<b>\$171,193,977</b>
Public Health	Oklahoma Health Care Authority	1				1	\$341,675,346
	Oklahoma State Department of Health	6		1	3	10	\$7,935,908
<b>Subcommittee Subtotal</b>						<b>11</b>	<b>\$349,611,254</b>
Human Services	Oklahoma Department of Human Services			2	1	3	\$16,982,181
<b>Subcommittee Subtotal</b>						<b>3</b>	<b>\$16,982,181</b>
Natural Resources and Regulatory Services	Oklahoma Department of Commerce		1			1	\$1,920,808
<b>Subcommittee Subtotal</b>						<b>1</b>	<b>\$1,920,808</b>
<b>Total Domain Programs</b>		<b>7</b>	<b>5</b>	<b>3</b>	<b>4</b>	<b>19</b>	
<b>Total Domain Expenditures</b>		<b>\$342,604,199</b>	<b>\$173,114,785</b>	<b>\$812,535</b>	<b>\$23,176,701</b>		<b>\$539,708,219</b>

Source: Legislative Office of Fiscal Transparency's creation based on data from OPSR, OSDE, Appropriation Reports and Agency Records.

Note: Presented funds only list state appropriated dollars.

<sup>11</sup> Please refer to Appendix G for the Oklahoma Early Childhood Appropriations Structure

*Table 05: Senate Appropriations Subcommittee Fiscal Framework for Oklahoma's Early Childhood System (FY18). (This table illustrates the fiscal framework of Oklahoma's early childhood education system as programs receive funding from different agencies reporting to different appropriation committees within the Oklahoma State Legislature.)*

The 19 Programs for Oklahoma Early Childhood Were Operated by Five State Agencies that Reported to Three Senate Appropriations Subcommittees in the 2018 Session.							
Appropriations Committee	Agency	Child Health	Early Education & Intervention	Basic Needs & Family Support	Child Care & Safety	Total Number of Early Childhood Programs	FY18 State Appropriations
Education	Oklahoma State Department of Education		4			4	\$171,193,977
<b>Subcommittee Subtotal</b>						<b>4</b>	<b>\$171,193,977</b>
Health and Human Services	Oklahoma Health Care Authority	1				1	\$341,675,346
	Oklahoma State Department of Health	6		1	3	10	\$7,935,908
	Oklahoma Department of Human Services			2	1	3	\$16,982,181
<b>Subcommittee Subtotal</b>						<b>14</b>	<b>\$366,593,435</b>
Natural Resources and Regulatory Services	Oklahoma Department of Commerce		1			1	\$1,920,808
<b>Subcommittee Subtotal</b>						<b>1</b>	<b>\$1,920,808</b>
<b>Total Domain Programs</b>		<b>7</b>	<b>5</b>	<b>3</b>	<b>4</b>	<b>19</b>	
<b>Total Domain Expenditures</b>		<b>\$342,604,199</b>	<b>\$173,114,785</b>	<b>\$812,535</b>	<b>\$23,176,701</b>		<b>\$539,708,219</b>

Source: Legislative Office of Fiscal Transparency's creation based on data from OPSR, OSDE, Appropriation Reports and Agency Records.

Note: Presented funds only list state appropriated dollars.

**LOFT's fiscal analysis revealed the majority of state appropriations (68 percent) for early childhood are overseen between Public Health and Human Services Appropriation Committees.** Further, both the federal and state appropriations supporting the State's early childhood system are more concentrated toward health and human services programs than early education programs.

### Policy Considerations

- The Legislature may consider creating a dedicated appropriations committee with a central focus on all early childhood agencies and programs.



## Finding 2: Oklahoma Has Opportunities to Streamline Early Childhood Investments and Improve Efficiencies Through a Unified State Strategy.

*“There are poor outcomes across our State, across systems, in lots of systems and it all ties back to the inter-connectiveness of systems....part of the reason we have these poor outcomes is because these systems are connected, and they haven’t worked well with one another.”*

– Oklahoma Secretary of Human Services, August 2021<sup>12</sup>

Each of the varied early childhood education (ECE) programs provided by the State has its own standards, governance structure, and targeted demographic. Individual families and children can participate in multiple programs – sometimes simultaneously - and providers can blend resources from multiple revenue streams including state, federal and private resources.

### Potential Duplication of Services

Oklahoma’s early childhood-centric programs share in the goal of improving outcomes for early education and development of Oklahoma’s children. However, the overlap of services across various agencies targeting similar demographics creates the potential for duplication of services as well as uncoordinated services to families. Early childhood-centric programs may even be competing for state funding based on the number of children they are serving.

The federal Child Care and Development Fund (CCDF) is one example of how services offered within a specific funding stream have cross domain purposes or components and do not easily distinguish accountability for outcomes. The CCDF is a block grant distributed by the U.S. Department of Human Services to the Oklahoma Department of Human Services (OKDHS). While the grant has an educational component, its main purpose is to increase the availability, affordability, and quality of child care services.

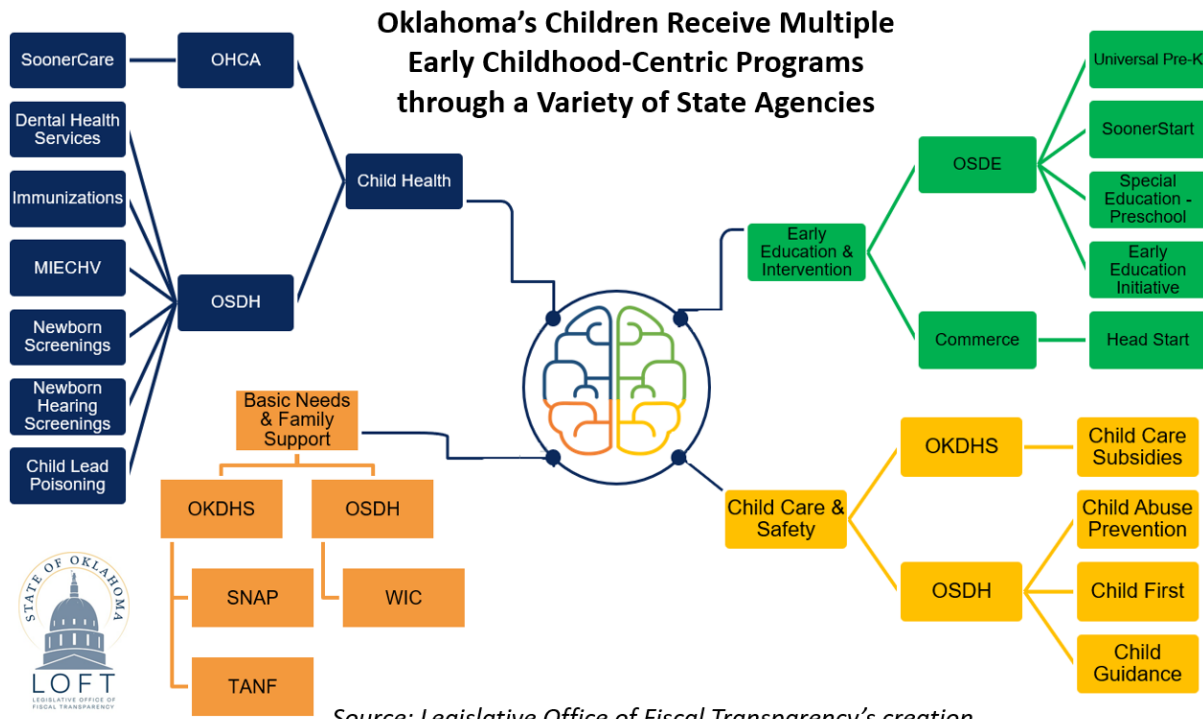
LOFT was unable to collect or analyze data for children enrolled in more than one program due to data sharing limitations. As agencies use different identifiers for program participants, children enrolled in multiple programs administered by different agencies cannot be tracked across different agencies (explained further in Finding 3). **As a result, it is difficult to determine the true number of**

**The overlap of services across various agencies targeting similar demographics creates the potential for duplication of services as well as uncoordinated services to families.**

<sup>12</sup> Thousand Stories Podcast, Defining Success in Education Episode 1.8.

**Oklahomans served and the extent of services being provided across the State.** Also, children may be receiving programs and services that do not have an explicit early learning purpose, like childcare, for which the State is providing funding. This is reflected in Figure 02 below.

*Figure 02: Oklahoma’s Children Receive Multiple Early Childhood-Centric Programs through a Variety of State Agencies. (This figure illustrates the wide variety of early childhood programs and services offered under different domains of the State’s early childhood system.)*



Source: Legislative Office of Fiscal Transparency’s creation.

The complexity of Oklahoma’s funding streams, program administration, data sharing, and oversight creates bureaucratic challenges regarding the development and execution of strategic policy goals, performance outcomes and initiatives. **These challenges are all symptoms of the root problem within the State’s early childhood system: governance.**

The State’s current mixed delivery system for early childhood creates an expanding web of early learning vision, goals and objectives for specific programs and targeted populations – with little attention given to the high potential of duplication of services or collaboration. This is not a challenge unique to Oklahoma. Several states have recently addressed inefficiencies and challenges with their respective early childhood systems by adapting their governance structures.

### States’ Early Childhood Education Governance Models

Early childhood governance refers to a state’s organizational structure and arrangement of authority and accountability for programs, financing, policy, delivery of services and strategic goals for publicly funded early childhood for children aged 0-5. Although federal funding comes

with attached regulations, states generally have autonomy in the way they choose to organize, manage, and fund ECE programs.

**According to the most recent data available from the National Conference of State Legislatures (NCSL), since 2004, seven states have created an entity to oversee several early care and education components; four of which were established since 2014.** Twelve states, plus the District of Columbia, have consolidated several agencies or programs into one entity that oversees multiple components. Thirty-two states have various agencies that provide programs and services that require coordination between the agencies.<sup>13</sup> LOFT's evaluation of peer states' ECE governance structures found three common strategies to enhance ECE strategic mission and program outputs: Creation, Consolidation, and Collaboration and Coordination.<sup>14</sup>

*Table 06: Early Childhood Governance Structures. (This figure illustrates the current early childhood governance structures across the United States.)*

<b>Early Childhood Governance Structures</b>			
<b>Model</b>	<b>Coordinated</b>	<b>Consolidation</b>	<b>Creation of Independent State Agency</b>
<b>Creation Method</b>	Collaboration and coordination across multiple state agencies and partners	Consolidation of existing divisions and programs into one state agency	Creation of a dedicated early childhood agency
<b>Structures</b>	Formal agreements across agencies, Governor's coordinating office, and/or a Children's Cabinet	Focused on merging primary funding sources into one agency - e.g. bringing multiple existing funding streams, federal and state, under a single state agency	Authority over accountability for programs and services - typically overseen by Executive Branch entity or new agency with a board or cabinet-level Secretary reporting to Governor
<b>Select Identified State Examples</b>	Delaware, Illinois, Oklahoma, Texas, Wisconsin	Arkansas, California, Florida, Maryland, Michigan, Missouri, North Carolina	Alabama, Colorado, Connecticut, Georgia, Massachusetts, New Mexico, Washington

*Source: Legislative Office of Fiscal Transparency's creation based on information from NCSL and government reports.*

## **Coordinated Governance**

Similar to Oklahoma's structure, a coordinated governance model distributes both authority and accountability for early childhood programs and services across multiple state agencies. In most models, these efforts are formalized through interagency agreements. LOFT's review of coordinated systems revealed this type of structure is often overseen by either peer agency collaboration or coordination through the Governor's Office.

<sup>13</sup> Please refer to Appendix H for a comprehensive view of early childhood governance models by state.

<sup>14</sup> Please refer to Appendix I for state examples of respective governance models.

## Consolidated Governance

Under the consolidated governance model, one existing state agency has authority and accountability for the administration all early childhood-centric programs. The potential benefits of this governance system are consistent policies and priorities, improved communication, greater efficiency, and streamlined financing of programs.

## Creation of Independent State Agency

The creation of an independent state agency establishes a new form of governance for states, wherein the authority and accountability for the State’s early childhood system is carried out by a stand-alone agency that is singularly focused on early childhood education outcomes. Generally, these programs include Head Start, childcare, pre-kindergarten and may possibly include oversight for Parts B and C of the Individuals with Disabilities Education Act (IDEA).

During fieldwork, LOFT spoke with representatives from both the Alabama Department of Early Childhood and the Georgia Department of Early Learning and Care regarding their use of this type of governance structure. Identified benefits from both agencies include improved efficiencies, centralized decision-making, consolidated data metrics, streamlined funding and a comprehensive strategic goal for their respective state’s children.<sup>15</sup>

## Early Childhood Case Study: Colorado

On June 23, 2021, Colorado’s Governor signed legislation creating the Colorado Department of Early Childhood, a stand-alone agency intended to address a system of “separation and fragmentation” by establishing a unified early childhood system for the State.<sup>16</sup> The Colorado Department of Early Childhood, once up and running in July 2022, will consolidate over 20 programs to include preschool instruction, mental health care, child and maternal health care, food assistance, financial assistance for families, and home visits.



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<sup>15</sup> Based on conversations with both the Alabama Department of Early Childhood and the Georgia Department of Early Learning and Care.

<sup>16</sup> [Colorado House Bill 1304](#)

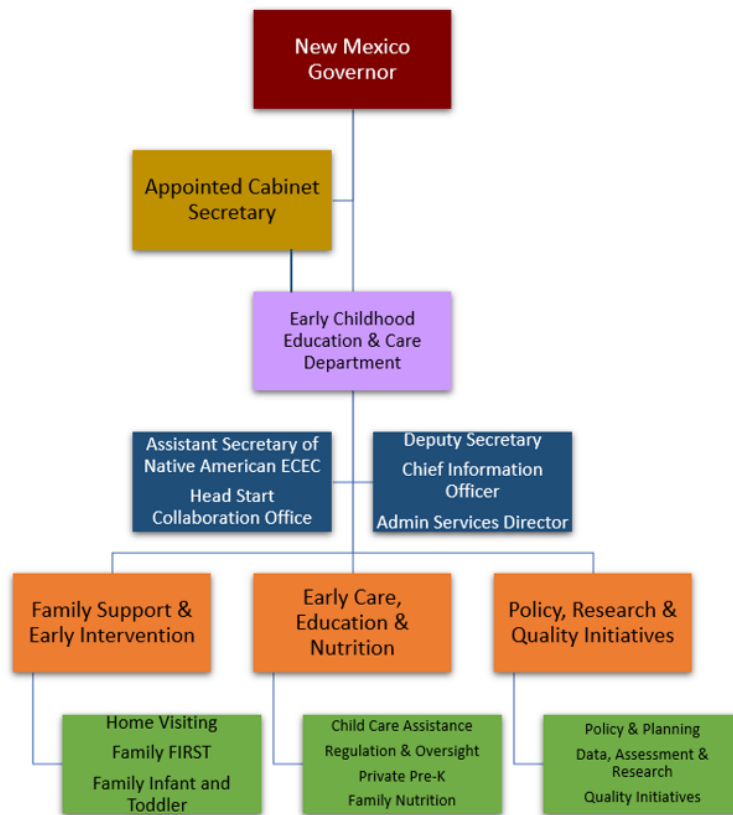
<sup>17</sup> Gov. Jared Polis press conference May 5, 2021.

### Early Childhood Case Study: New Mexico

New Mexico is another state that recently revised its delivery of early childhood programs and services, creating a new Early Childhood Education and Care Department (ECECD). Created in 2019 by Senate Bill 22, the new department centralizes all of New Mexico’s early childhood services into one agency which includes home visiting, early intervention, childcare, pre-kindergarten, nutrition and more.<sup>18</sup> New Mexico’s ECECD will receive funding from a newly-created Early Childhood Trust Fund, established via House Bill 83 in 2020.<sup>19</sup> New Mexico’s Early Childhood Trust Fund will be supplemented by oil, gas and federal mineral leasing revenues.

Figure 03: New Mexico’s Governance Early Care and Education Model. (This figure illustrates New Mexico’s early childhood governance structure reporting solely to the Executive branch and having all programs consolidated under one entity.)

#### New Mexico’s Governance Early Care and Education Model.



Source: Legislative Office of Fiscal Transparency’s creation based on reports from New Mexico LFC.

The Maine Legislature introduced legislation this year to simulate New Mexico’s governance model by creating a new cabinet-level department (The Department of Child and Family Services) that integrates all funding and ECE programs into a

**Opened in January 2020, New Mexico’s Early Childhood Education and Care Department (ECECD) centralizes all the state’s early childhood services into one agency which includes home visiting, early intervention, childcare, pre-kindergarten, nutrition and more.**

<sup>18</sup> [New Mexico Early Childhood Education and Care Department Act](#)

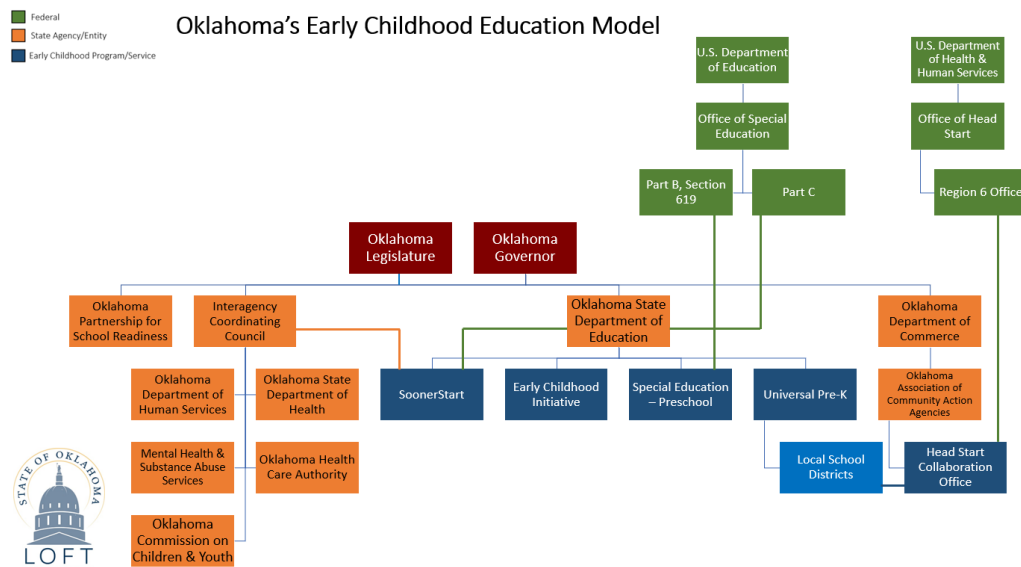
<sup>19</sup> [EARLY CHILDHOOD EDUCATION AND CARE FUND](#)

single department.<sup>20</sup> Maine’s legislation would remove services from the Maine Department of Health and Human Services (MDHHS) and create a separate state agency overseeing Head Start and child care services, maternal and child health, enforcement of child support, and residential care for children with disabilities.<sup>21</sup>

## Collaborative Alignment From Birth to the Early Grades

The needs of Oklahoma children are too often multifaceted, and most programs (Pre-K, health services and care) are currently siloed. As previously established, Oklahoma’s early childhood system is complex, and families may rely on different ECE programs and services for their children’s overall needs.

Figure 04: Oklahoma’s Early Childhood Education Model. (This figure illustrates Oklahoma’s early childhood coordinated governance structure and funding streams from various levels of government and partnerships with state agencies.)



Source: Legislative Office of Fiscal Transparency’s creation.

If Oklahoma were to adopt a unified state strategy that views early childhood as a system of inter-related programs, it could result in more efficient delivery of services to Oklahoma families. One strategy for fostering an inclusive and collaborative ECE system would be to adopt a more consolidated approach to governing Oklahoma’s ECE system, an idea previously recommended by the Bipartisan Policy Center. **In 2018, the think tank released a review of Oklahoma’s early childhood system and recommended the State could “increase efficiency and cost-effectiveness” by aligning the administration of early childhood programs together.**<sup>22</sup>

<sup>20</sup> [ME S 414 \(2021\)](#)

<sup>21</sup> As of June 2021, Maine legislation passed the Senate but failed to receive a vote in the House before end of session.

<sup>22</sup> [Creating an Integrated Efficient Early Care and Education System to Support Children and Families: A State-by-State Analysis](#)

## Federal Intent of Statewide Coordination

Following multiple reports from the United States Government Accountability Office (GAO) regarding the fragmentation of early childhood at the federal level, the U.S. government introduced requirements for states to address challenges within their respective systems with the intent of producing a stronger and more integrated early childhood system.

The Federal ‘Improving Head Start for School Readiness Act of 2007’ authorized the State Advisory Councils on Early Childhood Education and Care (SACs) grant. According to the U.S. Department of Health and Human Services, Office of Early Childhood Development,

***“The overall responsibility of the State Advisory Council is to lead the development or enhancement of a high-quality, comprehensive system of early childhood development and care that ensures statewide coordination and collaboration among the wide range of early childhood programs and services in the State, including childcare, Head Start, IDEA preschool and infants and families programs, and pre-kindergarten programs and services.”<sup>23</sup>***

The Act requires the Governor of each State to designate or establish a governmental entity to serve as the State Advisory Council on Early Childhood Education and Care for children from birth to school entry.<sup>24</sup> In 2010, Governor Brad Henry designated the Oklahoma Partnership for School Readiness (OPSR) as the State’s Early Childhood Advisory Council (HB 3126). This organization was statutorily created in 2003 to promote school readiness through community-based efforts to coordinate services and strengthen state-level early childhood policy.

In evaluating OPSR’s past research and coordination with state agencies, LOFT finds the organization has worked to strengthen the State’s early childhood system by seeking to coordinate and align initiatives across agencies but lacks the authority to compel action from those delivering services.

Recently, OPSR secured a federal grant for the purpose of conducting a needs assessment for early childhood. This work was completed January 2020 and led to the development of the “OKFutures Strategic Plan.”<sup>25</sup> With the OKFutures plan, OPSR presented a five-year plan to improve the state’s system of care for children from B-5. OPSR has also tracked legislative initiatives and worked with national and state leaders to assess and plan for a central early childhood data system. It is LOFT’s assessment that OPSR has the potential to serve a more direct role in the State’s early childhood system.

**LOFT finds the Oklahoma Partnership for School Readiness (OPSR) has worked to strengthen the State’s early childhood system by seeking to coordinate and align initiatives across State agencies but lacks the authority to compel action from those delivering services.**

<sup>23</sup> [State Advisory Councils Fact Sheet | The Administration for Children and Families \(hhs.gov\)](#)

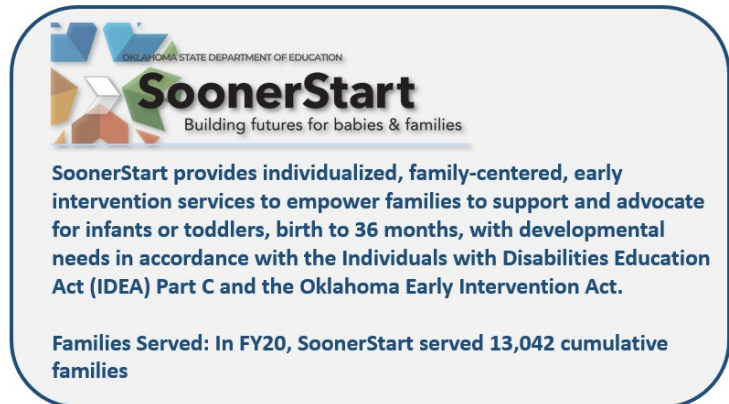
<sup>24</sup> Public Law (P.L.) 110-134

<sup>25</sup> [OKFutures Needs Assessment \(urban.org\)](#)

## Case Study: SoonerStart

Oklahoma's early intervention program, SoonerStart, is a prime example LOFT identified as having multiple funding streams, several partnerships and collaborations, and two different state agencies serving the same families. LOFT observed effective coordination and collaboration between the OSDE and OSDH regarding the delivery of services and establishing strategic goals for the program, but not with developing a joint funding plan.

SoonerStart is designed to meet the needs of families with infants or toddlers with developmental delays. The OSDE is designated as



the lead agency for SoonerStart, but is also supported by the OSDH and the State's Interagency Coordinating Council (ICC). As directed by state statute, the ICC advises and assists OSDE in planning and promoting the implementation of a coordinated and family-centered services system to address the needs of infants and toddlers with developmental delays or disabilities and their families.<sup>26</sup> <sup>27</sup> However, LOFT identified no clear objectives or strategy from the ICC to "advise and assist" in fulfilling OSDE's responsibilities for SoonerStart.

Per state statute, the OSDE is tasked with presenting a **joint funding plan** every fiscal year for SoonerStart, detailing **all financial resources** from federal, state, local and private sources being coordinated to fund early intervention services.<sup>28</sup> State statute also requires SoonerStart to be delivered and supported by OSDE, the Oklahoma State Department of Health (OSDH), the Department of Human Services (OKDHS), the Oklahoma Department of Mental Health and Substance Abuse Services (OMHSAS) and other publicly funded services for infants and toddlers with disabilities and their families.<sup>29</sup> Yet, when LOFT requested a copy of

<sup>26</sup> [SoonerStart Interagency Coordinating Council \(ICC\) | Oklahoma State Department of Education](#)

<sup>27</sup> The ICC is a required component of the Individuals with Disabilities Education Act (IDEA) Part C and the Oklahoma Early Intervention Act.

<sup>28</sup> O.S. 70 § 13-124

<sup>29</sup> O.S. 70 § 13-122



the latest joint funding plan, as described in statute, the OSDE explained:

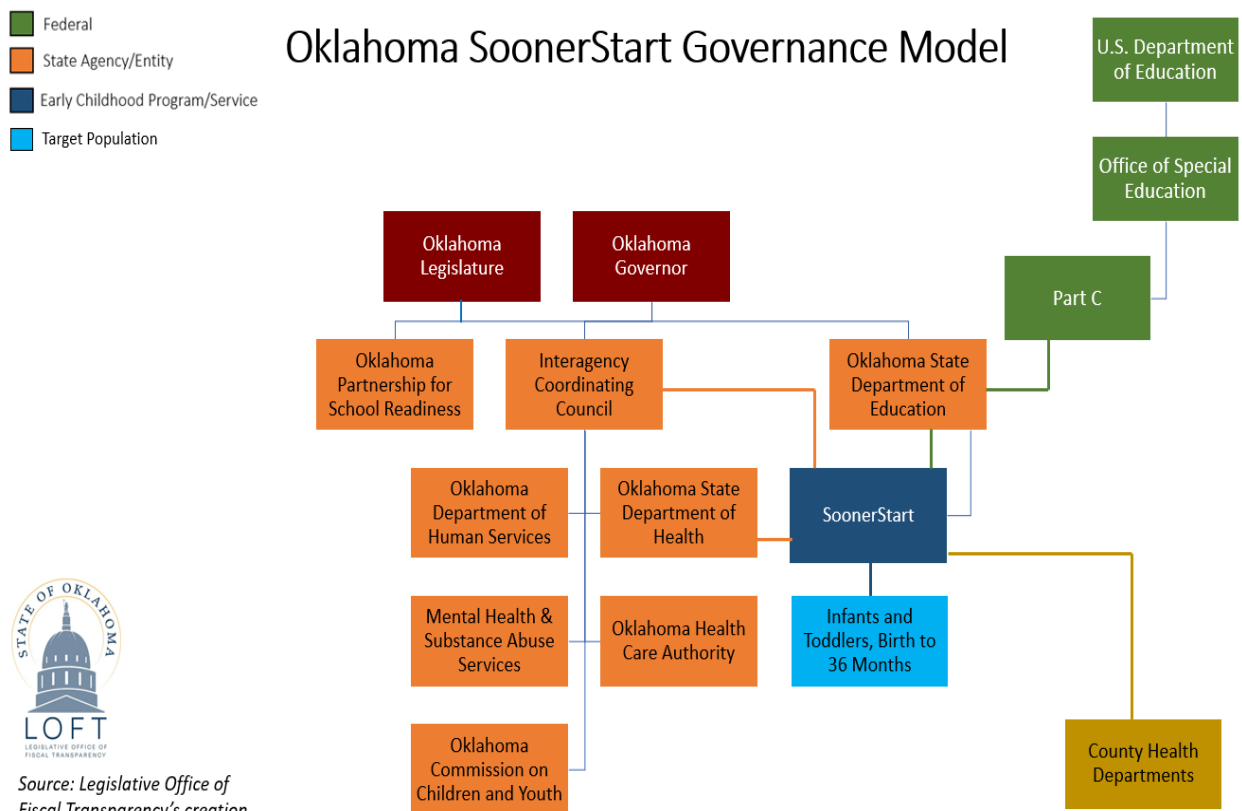
**“At some point, there was some conflict regarding the budget request because sometimes the Joint Funding Plan was not in agreement with the OSDE budget request. Around 2005 (?), the ICC was moved to the OSDE (see subsection B in this same section of law) and it was determined at that time that OSDE’s budget request would serve as the Joint Funding Plan. This practice has continued ever since.”**

The OSDE further stated:

**“SoonerStart still develops a full budget that is included as an exhibit to our contract with OSDH. This contract is not approved by the ICC, but rather it is a discussion item when talking about funding.”<sup>30</sup>**

However, the exhibit OSDE provided for SoonerStart is a separate requirement under another state statute and does not fulfill the statutory requirements of a joint funding plan for SoonerStart.<sup>31</sup>

Figure 05: Oklahoma SoonerStart Governance Model. (This figure illustrates the governance structure of Oklahoma’s SoonerStart program, highlighting the various collaborations and funding streams.)



Source: Legislative Office of Fiscal Transparency’s creation.

<sup>30</sup> Please refer to Appendix J for a copy of the latest SoonerStart exhibit.

<sup>31</sup> O.S. 70 § 13-125

## A Tale of Two Advisory Boards

Throughout this evaluation, LOFT observed two independent State advisory boards not being fully utilized in the capacity they were intended to serve. **LOFT’s research shows that both OPSR and the ICC functionally act as coordinating boards to State agencies instead of advising State leaders on the strategic vision for their respective services.** LOFT finds that both advisory boards were created to serve strategic roles in the State’s early childhood system and should be fully utilized as intended to lead the enhancement of a comprehensive early childhood system.

The ICC is required by both State and Federal statute. Based on federal statutory language, the ICC **must assist** the lead agency (SDE) with functions that include the identification of all funds used for early childhood, assigning financial responsibility to agencies, and providing annual reports to the Governor.<sup>32</sup> As the ICC is designated as the reporting entity, there is implied oversight by the ICC regarding ensuring the lead agency’s enforcement of the federal provisions.<sup>33</sup>

LOFT’s fieldwork and stakeholder discussions contributed to the observation of two distinct perceptions regarding the ICC’s role. OSDH appeared to view the ICC as a strategic partner that directly advocates on behalf of SoonerStart. However, conversations with the OSDE reflect a working relationship confined to an “advise and assist” capacity. Federal statutes grant the ICC authority to act as a body of experts to guide Early Childhood programs. Through numerous conversations, LOFT finds OSDE’s view of the ICC is limited to current State statutes, which do not convey the same authority as the federal statutes.

## Policy Considerations and Agency Recommendations

### Policy Considerations

The Legislature may consider the following policy changes:

- Restructuring Oklahoma’s early childhood education system within an existing state agency focused on enhancing the development of children’s early education. Potential agencies include the Office of Educational Quality and Accountability, the Oklahoma

<sup>32</sup> [Sec. 303.604 Functions of the Council—required duties - Individuals with Disabilities Education Act](#)

<sup>33</sup> [Sec. 303.605 Authorized activities by the Council - Individuals with Disabilities Education Act](#)

State Department of Education, the Oklahoma Department of Human Services and the Oklahoma State Department of Health. Additional options include building on the existing Oklahoma Partnership for School Readiness or the Oklahoma Commission on Children and Youth under the Oklahoma Department of Human Services.

- Creating an independent state agency or repurposing an existing governmental entity with the authority to create and execute a statewide strategy for improving the health, wellness, and early development of Oklahoma children.
- Amending O.S. 70 § 13-122 to add the Oklahoma Partnership for School Readiness to the Interagency Coordinating Council.
- Requiring the production of a comprehensive annual report about early childhood education-centric programs to include all state, federal and private resources utilized by agencies, programs, services, and targeted populations. If a comprehensive annual report is adopted, the Legislature may further consider eliminating existing reporting requirements for similar data that is currently submitted separately by agencies.

### Agency Recommendations

- The Oklahoma State Department of Education should fulfill the statutory requirements provided for in O.S. 70 § 13-124 by submitting a joint funding plan for SoonerStart.
- The Oklahoma State Department of Education should produce a comprehensive annual report on all early childhood education-centric programs and services provided, to include all revenue sources, state and community partners for delivery of services and targeted populations served.
- The Oklahoma State Department of Education should establish a review schedule for the independent evaluation of the quality, efficacy, costs, and educational outcomes of early childhood education-centric programs early childhood education programs and services provided. The results of any evaluations should be made publicly available.
- The Oklahoma State Department of Education, or lead agency designate, should compile a comprehensive list of early childhood resources within the State to distribute to school districts, parents, and other stakeholders.

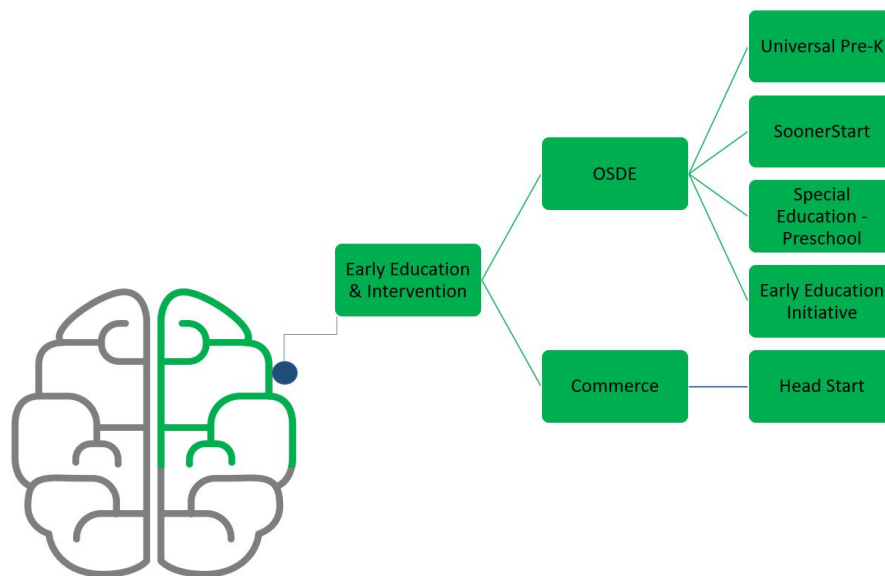


Currently, program accountability is tied to the source of funds, an agency-centric administrative approach as opposed to child-centric.

## Finding 3: Oklahoma’s Fragmented Funding Approach to Early Childhood Limits Accountability and Effectiveness

### Education’s Role within the State’s Early Childhood System

For the purpose of this evaluation, LOFT centered on early childhood education programs and services whose primary mission is to deliver early learning and cognitive development programs for children between birth and 5-years old (B-5).

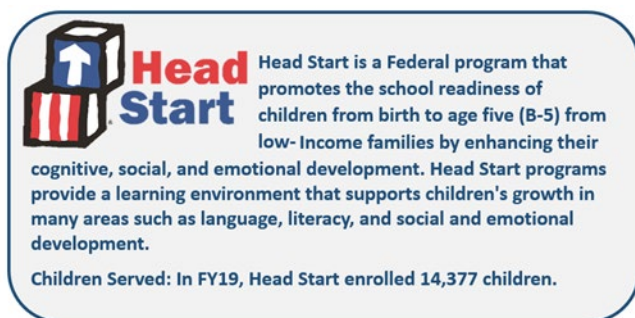


From LOFT’s review and analysis, the State’s ECE programs are intended to improve school readiness and cognitive abilities of young children. The following sections reflect LOFT’s analysis and observations regarding the educational component within the State’s early childhood system.

### Accountability of Early Childhood Education Programs

Oklahoma’s decentralized system for early childhood programs complicates accountability for outcomes. For example, Head Start, the second-largest early childhood education (ECE) program by enrollment and funding, is administered by the Department of Commerce. Currently, program accountability is tied to the source of funds, an agency-centric administrative approach as opposed to child-centric.

Operating ECE programs across different agencies that use varied funding streams also creates challenges regarding administration, accountability, and consistency of data, as there are often separate requirements regarding allowable expenses, reporting, data collection and recipient eligibility. **Funding sources, specifically federal funds, tend to operate independently from one another.**



Head Start experiences collaboration challenges given its federal-to-local structure and integration with both state and local early childhood programs. For example, schools that receive public funding for

their early education programs may have a mix of Head Start and/or State pre-kindergarten funded children in one classroom. Through fieldwork, LOFT learned from representatives of Head Start that **many local school districts, despite the need for assistance, fail to apply for grant funding from Head Start due to the rigorous requirements attached to the federal funding.**<sup>34</sup> As such, some Oklahoma school districts solely rely on local and state dollars to fund pre-kindergarten classrooms, leaving federal resources untapped.

According to the 2020 OKFutures Needs Assessment report from the Oklahoma Partnership for School Readiness (OPSR), *“Head Start directors also indicated little relationship with non-Head Start committees, interagency coordination councils, or preschool special education work or advisory groups...Additionally, Head Start directors identified some aspects of collaboration with state and local agencies as difficult.”*

Agencies and ECE programs are supplemented with federal funds, some of which are billed through one agency, reimbursed to the lead agency, and then returned to the agency of service. A prime example is SoonerStart. OSDH bills the Oklahoma Health Care Authority (OHCA) for the Medicaid eligible services, which are then reimbursed to the lead agency (OSDE). Portions of these funds will be returned to OSDH for direct services while the remaining funds are distributed to OSDE for “resource coordination.” The allocation of these funds is determined by the interagency funding plans/agreements.

**The Federal government generally grants governors latitude in assigning early childhood funding and designating program responsibility to state agencies.**

Any changes require resubmittal of federal forms reflecting the new receiving agency.

**Operating Early Childhood Education programs across different agencies that use varied funding streams also creates challenges regarding administration, accountability, and consistency of data, as there are often separate requirements regarding allowable expenses, reporting, data collection and recipient eligibility.**

<sup>34</sup> Head Start requirements include teacher training and professional development, managing and accountability of federal funding, teacher qualifications, and other program standards.



The one notable exception is IDEA Part B, Section 619 funding, which is required by statute to be administered by state departments of education.

IDEA requires the U.S. Department of Education to award Part B funds to state educational agencies, however, IDEA does not specify which state agency (the “lead agency”) must implement Part C. Lead agencies in states vary, with assignment of Part C made to state health departments, education departments, or other departments, including combined health and human services departments.<sup>35 36</sup>

LOFT’s analysis and review of federal funding streams and eligibility requirements further revealed both State agencies and Oklahoma families may experience challenges with navigating ECE programs. For example, eligibility requirements differ between IDEA Parts B and C, which impacts transitioning from SoonerStart (IDEA Part C) into special education (IDEA Part B) within local school districts. The transition process from IDEA Part C to Part B, a required component under IDEA, involves several sequential steps, and when any of these steps are delayed, a child could miss out on critical services.

Information exchange can also create difficulties for agencies and local school districts as children transition from SoonerStart to IDEA Part B in their respective school districts. In conversations with both the OSDH and OSDE, LOFT learned that information exchange may not occur for several reasons, including federal regulations relating to privacy and parental consent requirements to share child data and IDEA Part B evaluations. Without access to information on eligibility decisions, early intervention officials may be unaware if they need to refer families and children denied Part B services to other early childhood programs and services.

## Enrollment in Early Childhood Education Programs

LOFT’s analysis reveals that Oklahoma children receive ECE services through five primary programs, four of which are under the Oklahoma State Department of Education (OSDE) and one under the Oklahoma Department of Commerce (Commerce). Universal Pre-K (Pre-K), Special Education – Preschool (IDEA Part B, Section 619), SoonerStart (IDEA Part

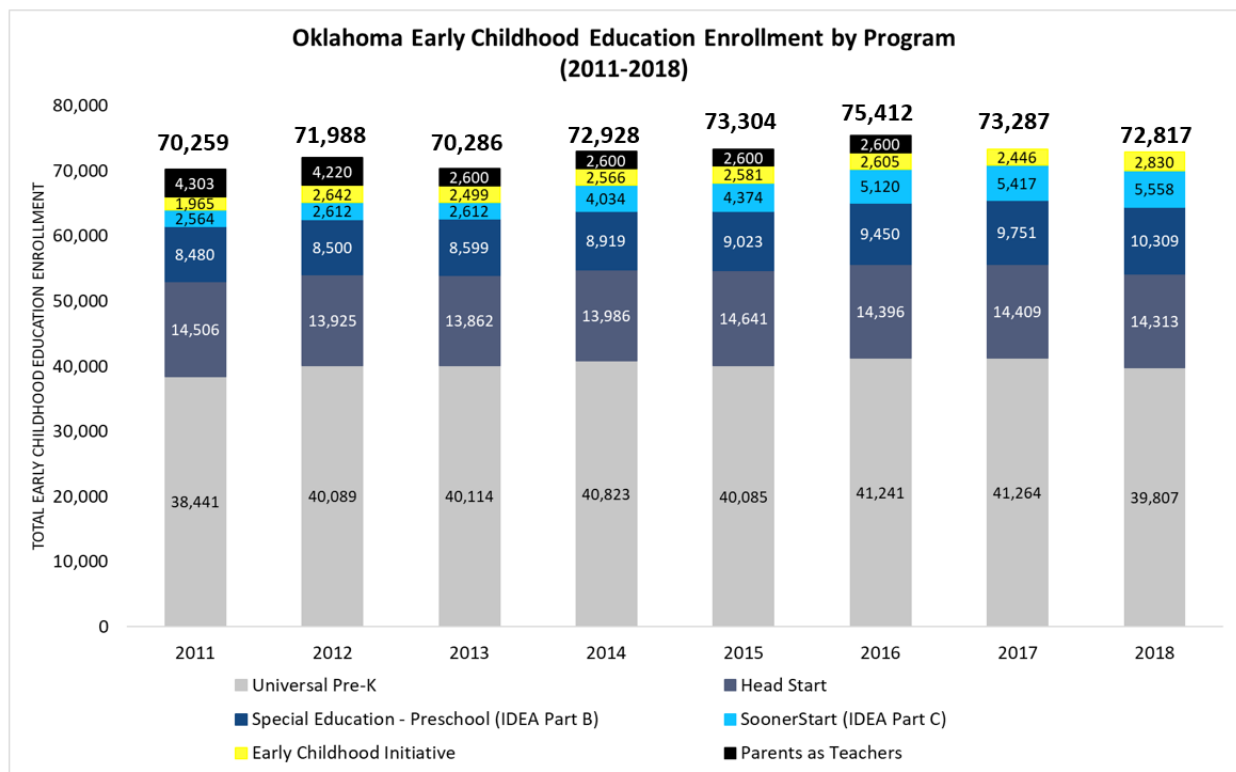
<sup>35</sup> 20 U.S.C. §§ 1411

<sup>36</sup> According to a 2016 list of 56 Part C Lead Agencies in U.S. states and territories compiled by the Early Childhood Technical Assistance Center (<http://ectacenter.org/partc/ptclead.asp>), 32 lead agencies are led by their state’s Health Department, Department of Human Services, or Department of Health and Human Services; 13 by the Department of Education; 3 are co-led by the Departments of Health and Education; and the remaining 8 lead agencies consisted of other state agencies including Developmental Services, Economic Security, and Rehabilitation Services.

C) and Early Childhood Initiative are the four primary early education and intervention programs administered under the OSDE. Head Start is located within the Oklahoma Association of Community Action Agencies (OACAA) under the umbrella of Commerce.<sup>37</sup>

LOFT’s analysis determined that the State provided early childhood education services to over 72,817 unduplicated children birth through 5-years old (B-5) in 2018 (the latest data available for all ECE programs).<sup>38</sup> Pre-K is the State’s primary program for the B-5 population, with the most recent data in 2018 reflecting that 55 percent of all children being served by ECE programs were enrolled in Pre-K. Chart 07 below illustrates the trend of enrollment by ECE program.

Chart 07: Oklahoma Early Childhood Education Enrollment by Program (2011-2018). (This chart illustrates the number of students enrolled in State early childhood education programs between 2011-2018).



Source: Legislative Office of Fiscal Transparency’s analysis based on data from OPSR, Appropriation Reports and Agency Records.  
 Note: Enrollment and funding data for the Rural Infant Stimulation Environment (RISE) Program is not included in analysis due to data limitations.

As presented in Chart 07, both Pre-K and Head Start accounted for 74 percent of all unduplicated children served in Oklahoma. In 2018, nearly 40 thousand were enrolled in Pre-K and more than 14 thousand were receiving services from Head Start.

Chart 07 reports only the number of unduplicated children, however, families are often enrolled in multiple programs at any given time. For example, many students enrolled in Pre-K

<sup>37</sup> Please refer to Appendix K for a description of early education and intervention programs.

<sup>38</sup> As a point of comparison, in FY19 New Mexico provided early childhood programs to 73,871 children. [2018 Accountability Report Early Childhood Updated.pdf \(nmlegis.gov\)](#)

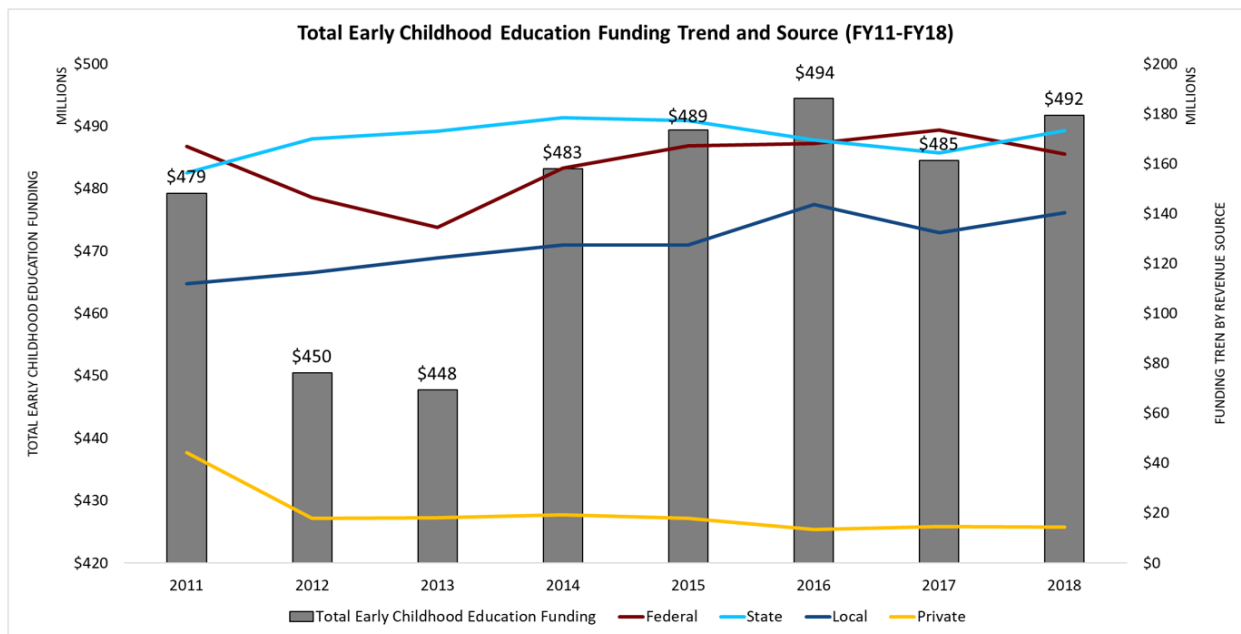
half-day programs also utilize other programs like Head Start or childcare services in order to receive full-day programming. LOFT’s analysis of data from the Head Start Collaboration Office reveals 1,868 students in 58 school districts across the state received Pre-K services through Head Start in FY21.<sup>39</sup> Children may also be receiving additional services within the State’s early childhood system beyond the education component.

### Early Childhood Education Funding Trends

In an attempt to bring clarity to Oklahoma’s complex system, LOFT mapped all sources of funding for the delivery of early childhood education programs, including state, federal, local and private funds.

Between 2011-2018, funding for Early Childhood Education (ECE) increased by 3 percent. As illustrated in Chart 08 below, ECE funding has a linear increase in funding, increasing to approximately \$491 million in FY18. **Since 2011, Oklahoma ECE has received over \$3.8 billion, equating to an average of \$477 million per year allocated towards ECE programs and services.**

Chart 08: Total Early Childhood Education Funding Trend and Source (FY11-18). (This chart illustrates early childhood education spending trends since 2011.)



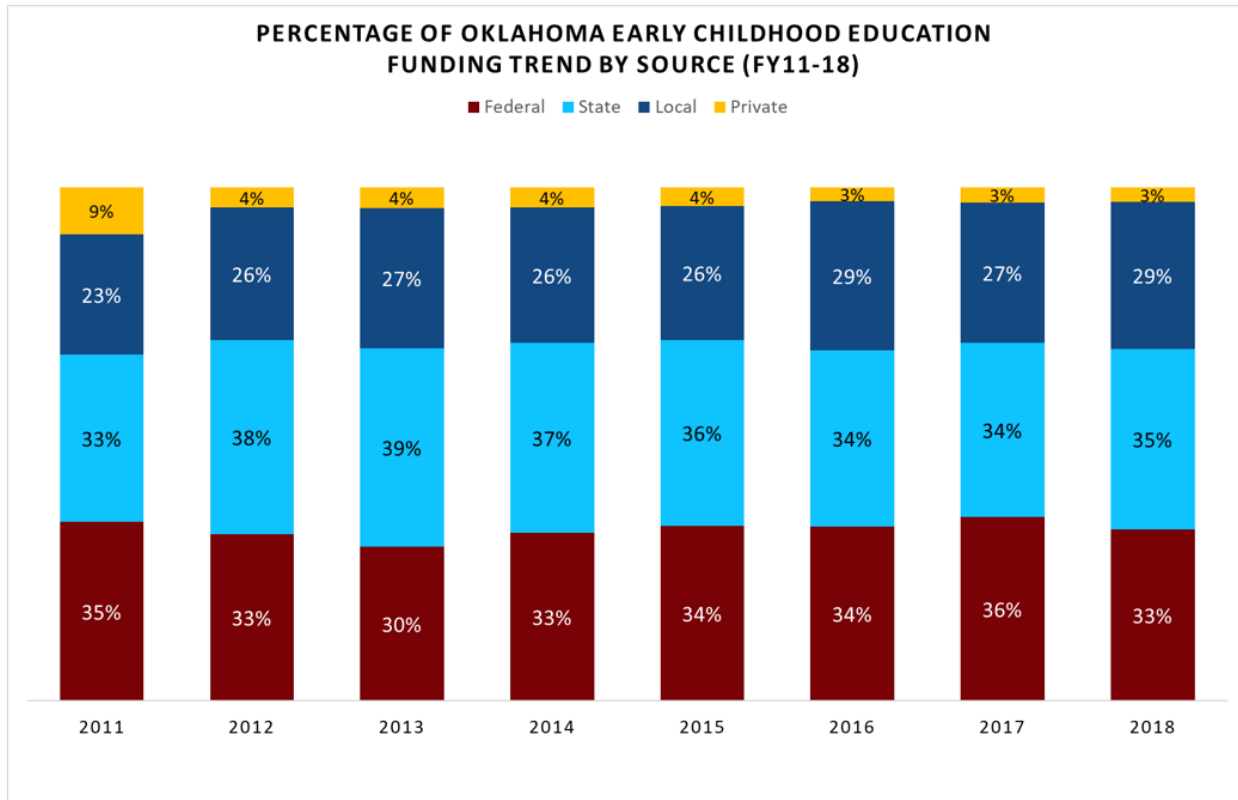
Source: Legislative Office of Fiscal Transparency’s analysis based on data from OPSR, Head Start and OSDE.

As illustrated below in Chart 08, State funding has surpassed and outpaced the federal investments into ECE programs between FY11-18, although just marginally. State, federal and local funds almost equally share the funding burden. In 2017, two ECE programs - Parents as Teachers and Rural Infant Stimulation Environment Program (RISE) - were eliminated; this is reflective in the decrease in State funding.

<sup>39</sup> Please refer to Appendix L for breakdown of Head Start enrollment by school district.



Chart 09: Percentage of Oklahoma Early Childhood Education Funding Trend by Source (FY11-18). (This column chart illustrates the composition of funding by revenue source for early childhood education programs.)



Source: Legislative Office of Fiscal Transparency's analysis based on data from OPSR, Appropriation Reports and Agency Records.

In FY18, the majority (35 percent) of funding for Oklahoma ECE was from State funding. Together, both the federal and state appropriated funds contributed 68 percent of all revenue supporting Oklahoma ECE in FY18.<sup>40</sup> Table 07 below details each program's respective revenue sources for FY18.

<sup>40</sup> Please refer to Appendix M for Federal Funding Formulas for Early Childhood Education Programs

*Table 07: Summary of Early Childhood Education Funding by Source. (This table itemizes funding levels by source for Oklahoma's early childhood education programs.)*

Early Childhood Education Program	FY18 Funding Source				FY18 Total Funding
	Federal	State	Local	Private	
Universal Pre-K	\$33,988,013	\$145,038,018	\$140,402,313		\$319,428,344
Head Start	\$119,170,464	\$1,920,808			\$121,091,272
Early Childhood Initiative		\$10,500,000		\$14,426,699	\$24,926,699
SoonerStart	\$7,114,818	\$15,655,959			\$22,770,777
Special Education - Preschool (IDEA Part B, 619)	\$3,513,531	\$0*			\$3,513,531
<b>FY18 Total</b>	<b>\$163,786,826</b>	<b>\$173,114,785</b>	<b>\$140,402,313</b>	<b>\$14,426,699</b>	<b>\$491,730,623</b>

Source: Legislative Office of Fiscal Transparency's analysis based on data from Head Start and OSDE provided on August 30, 2021

\*Note: Includes no other weights generated in the state funding formula, including special education, due to data limitations. Federal and State funding for SoonerStart includes Medicaid matching funds.

## Funding per Pupil

Based on the enrollment information presented in Finding 1, LOFT used specific program funding to generate both a state and total funding per pupil analysis. LOFT found the State's investment in ECE programs equates to \$2,377 per pupil. However, as shown in Table 08 below, funding from federal, local and private sources significantly raises the total funding per pupil in the State to \$6,753.

*Table 08: Unduplicated Children Served by Early Childhood Education Programs. (This table illustrates the total number of unduplicated children served by specific ECE program and funding per pupil based on both state and total expenditures in FY18. Families and children utilizing more than one program are not accounted for in this table.)*

Early Childhood Education Program	Unduplicated Children Served	FY18 State Funding	FY18 Total Funding	FY18 State Funding Per Pupil	FY18 Total Funding Per Pupil
Universal Pre-K	39,807	\$145,038,018	\$319,428,344	\$3,644	\$8,024
Head Start	14,313	\$1,920,808	\$121,091,272	\$134	\$8,460
Special Education - Preschool (IDEA Part B)	10,309	\$0*	\$3,513,531	\$0*	\$341
SoonerStart (IDEA Part C)	5,558	\$15,655,959	\$22,770,777	\$2,817	\$4,097
Early Childhood Initiative	2,830	\$10,500,000	\$24,926,699	\$3,710	\$8,808
<b>Total Early Childhood Education</b>	<b>72,817</b>	<b>\$173,114,785</b>	<b>\$491,730,623</b>	<b>\$2,377</b>	<b>\$6,753</b>

Source: Legislative Office of Fiscal Transparency's analysis based on data from Head Start and OSDE

\*Note: Includes no other weights generated in the state funding formula including special education due to data limitations. LOFT's analysis is a conservative estimate as state funding for special education was not included in data provided.

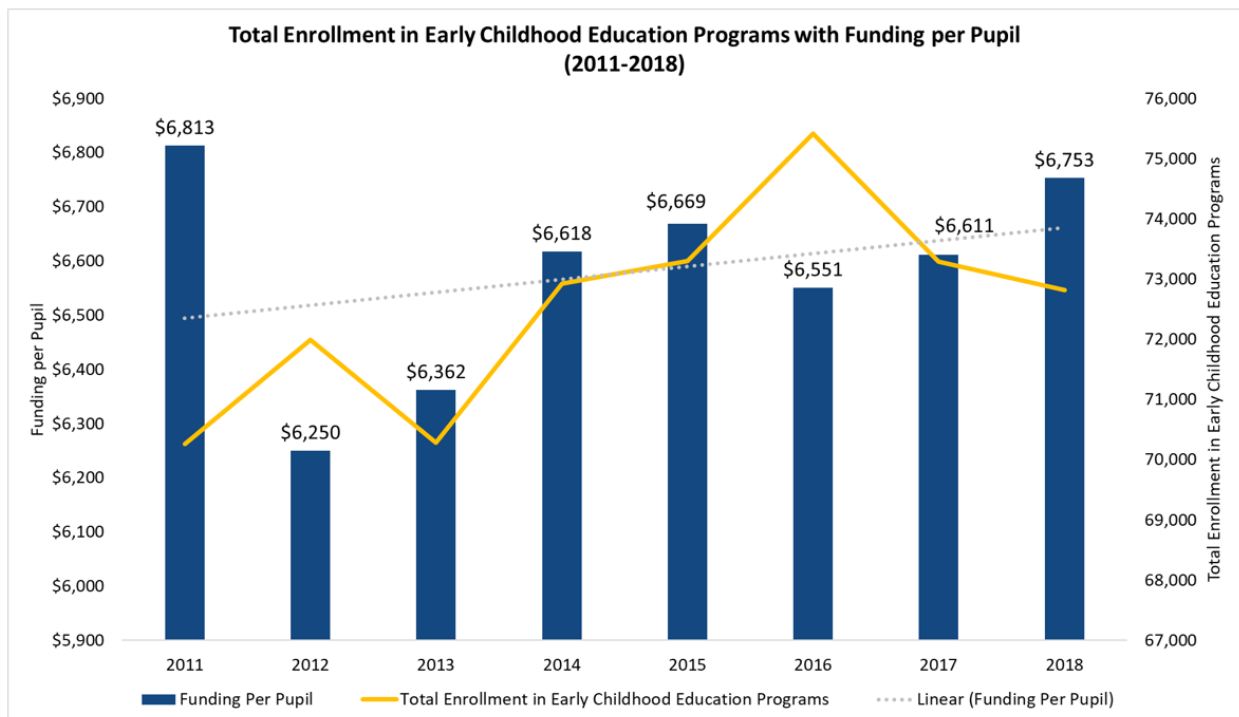
While some commonly used per pupil calculations include just state-appropriated funds, Oklahoma statute provides the following definition:

***“per-pupil expenditure’ shall mean the aggregate current expenditures of school districts, from all funding sources including federal funds, state funds and local funds,...”<sup>41</sup>***

LOFT recognizes the potential for interpretational differences between funds “expended” versus total funding per pupil. However, based on LOFT’s research, **incorporating all funding sources provides a more accurate reflection of the efficacy of program delivery.** For example, using just state appropriations, funding per pupil for children in Universal Pre-K (Pre-K) was \$3,644 in FY18. However, after inclusion of all funding sources, funding per pupil equals \$8,024; a 120 percent difference in the level of funding per student.<sup>42</sup>

Chart 10 below shows the trend for funding per pupil, inclusive of all revenue sources for ECE programs. As illustrated, since 2011 the funding per pupil has experienced a positive linear trend despite clear fluctuations in the level of financial support over the years. **LOFT’s analysis found that federal funding had the largest variance of all revenue sources.**

*Chart 10: Total Enrollment in Early Childhood Education Programs with Funding per Pupil (2011-2018).*



*Source: Legislative Office of Fiscal Transparency’s analysis based on data from OPSR, Head Start and OSDE.  
 Note: Funding per pupil dropped in 2012 and 2013 due to a decline in federal funding for early childhood education programs.*

<sup>41</sup> 70 O.S. § 124

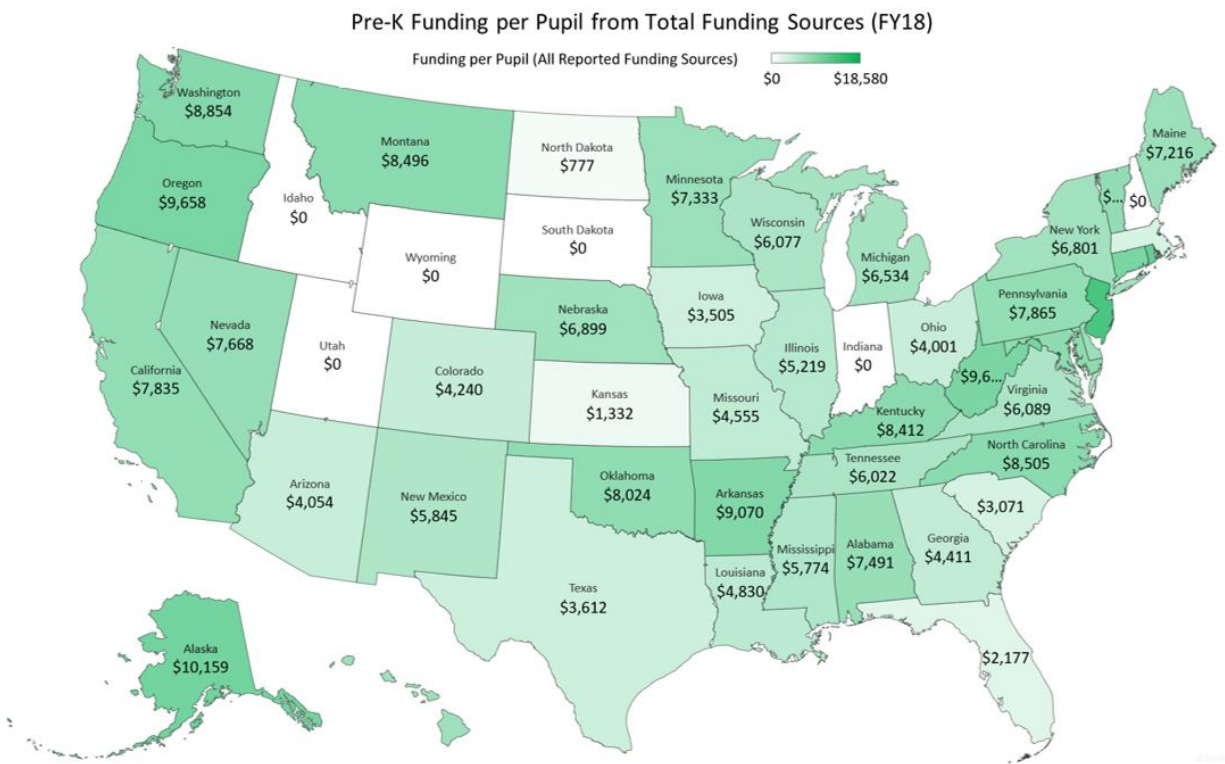
<sup>42</sup> LOFT’s analysis based on all sources of funding (federal, state and local). Cross referenced with NIEER Annual Reports and analysis.

## Funding Trend for Universal Pre-K

Administered under the Oklahoma State Department of Education (OSDE), four-year old children may receive either half-day or full-day Pre-K within local school districts. Public school districts receive funding for Pre-K through the state school finance formula, as weights for either half or full-day Pre-K students are assigned to identify and provide additional funding to support children within the program. As the State’s largest ECE program, by both enrollment and total funding, LOFT conducted a brief analysis of the historical funding trends for Pre-K.

Chart 11 below presents a national perspective of Pre-K per pupil spending. **In 2018, Oklahoma ranked 14th-highest across the nation. Regionally, only Arkansas spends more per Pre-K pupil than Oklahoma. In FY18, Oklahoma’s Pre-K funding per pupil was nearly four times higher than Florida and also higher than Vermont, two states which provide universal preschool for 4-year-olds.**

Chart 11: Public Pre-K Funding per Pupil from Total Funding Resources by State (FY18). (This geographical map illustrates the spending level for Pre-K students by state for all funding sources, inclusive of federal and local funding.)



Source: Legislative Office of Fiscal Transparency’s analysis based on data from NIEER.  
 Note: In FY18, D.C., Florida, Oklahoma and Vermont provided universal preschool for 4-year-olds. Idaho, Indiana, New Hampshire, South Dakota, Utah and Wyoming had no Pre-K program.  
 Note: All funding is self-reported from respective states to NIEER.

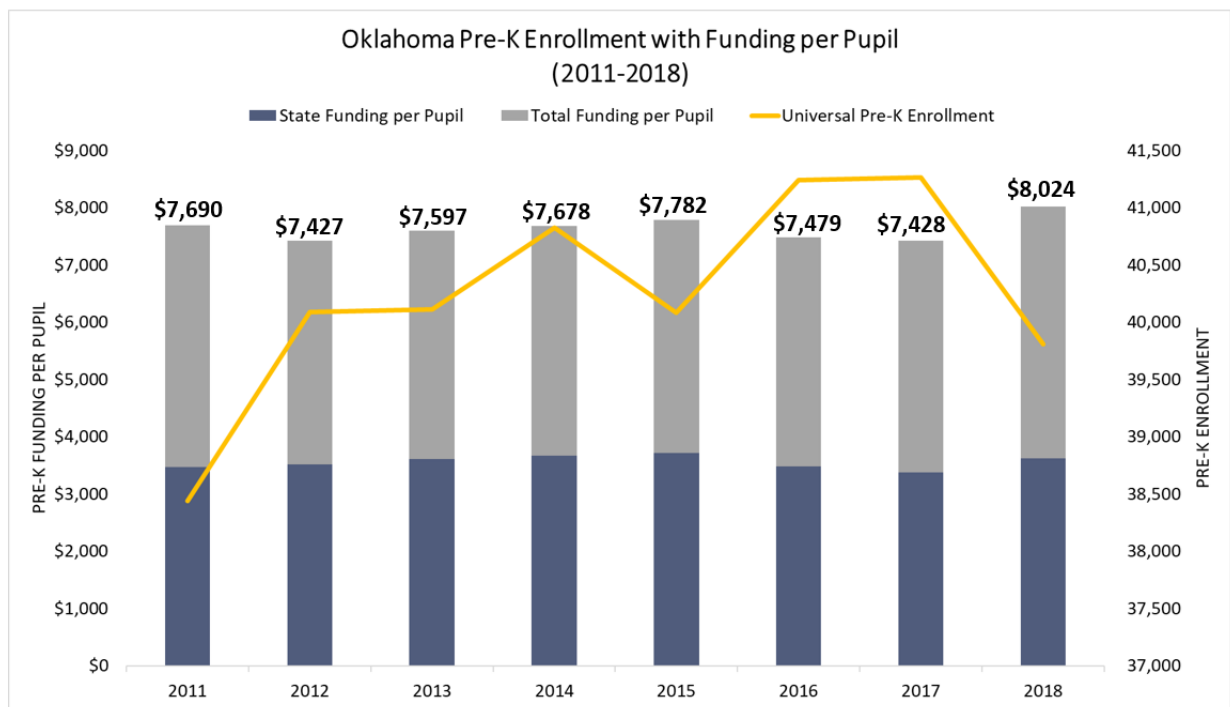
According to 2020 data from the National Institute for Early Education Research (NIEER), Oklahoma’s Pre-K funding per pupil increased to \$9,404, a 17 percent increase from FY18.<sup>43</sup>

NIEER

## NIEER FY20 Update

The updated rankings from NIEER place **Oklahoma as highest in the region for per pupil Pre-K funding and ninth-highest in the nation.** In FY20, NIEER also recognized Oklahoma as one of only four states in the nation that fund Pre-K students beyond the minimum cost to provide full-day and high-quality preschool. **Between FY11-20, state funding for Oklahoma Pre-K increased by 48 percent.**

Chart 12: Pre-K Enrollment with Funding per Pupil (2011-2018). (This chart illustrates both the funding per pupil, inclusive of all funding resources, with total enrollment for Universal Pre-K.)



Source: Legislative Office of Fiscal Transparency’s analysis based on data from OPSR.

Note: LOFT’s analysis of OPSR’s data was cross referenced with annual reports from NIEER and confirmed for accuracy. Pre-K Enrollment from NIEER.

Despite the increasing investment and growth in Pre-K funding per pupil, **LOFT was unable to examine academic outcomes nor calculate the return on investment to the State due to a lack of performance benchmarks, evaluations and assessments of the State’s Pre-K program.** This is further discussed in detail in Finding 4.

<sup>43</sup> [NIEER State of Preschool](#)

## Policy Considerations and Agency Recommendations

### Policy Considerations

The Legislature may consider the following policy changes:

- Require the development of a coordinated funding strategy across all state agencies supporting early childhood education.
- Restructuring Head Start within an existing state agency focused on enhancing the development of children's early education for better alignment of agency mission and early childhood objectives. Options include the Oklahoma State Department of Education, Oklahoma Department of Human Services and the Department of Health. Additional options include building on the existing Oklahoma Partnership for School Readiness or the Oklahoma Commission on Children and Youth under the Oklahoma Department of Human Services.
- Requiring future analysis of funding per pupil from all sources of revenue in addition to all funds expended to provide an accurate reflection of financial inflows and outflows supporting early childhood education.



## Finding 4: Lack of Data Limits the State’s Ability to Assess Investments and Outcomes into Early Childhood Education.

*“Program administrators, policymakers, and advocates need to know the entire birth-to-five population in Oklahoma by child and family demographics, unduplicated counts of how many of these children are currently being served by which combinations of early childhood programs, and at which levels of quality.” – OPSR ECIDS Report.*

### Siloed Data Systems

Timely, accessible, and accurate data on ECE programs and the families and children they serve is critical to the development of evidence-based policy. Additionally, improved data and governance could enhance the delivery, accountability and transparency of the State’s ECE efforts. Early childhood data is currently compartmentalized in different state agencies with separate source systems; moreover, much of this information is highly sensitive, requiring rigorous data governance, management, and oversight.

During LOFT’s evaluation, state agencies and stakeholders described data systems that are not linked or integrated within B-5 programs and have significant limitations regarding their ability to access and analyze data or share data across systems. One child receiving multiple services across differing agencies will have a different unique identifier for each agency, limiting agencies’ capabilities to share and coordinate information regarding programs and services. OSDE is working with two of their early education programs to link and share data.<sup>44</sup> Having the capacity to share information across State agencies on the same targeted population is critical to identifying and addressing the underlying factors for a student’s academic performance. **As stated by OSDE, “there are multiple external factors outside the classroom that impact students’ academic performances.” This underscores the importance of data sharing across State agencies serving the same families and children.**

Figure 06, provided by the Oklahoma Partnership for School Readiness (OPSR), illustrates the State’s data landscape for early childhood education across different state agencies and organizations.<sup>45</sup> As shown in Figure 06, Oklahoma’s data is collected, stored, and managed by various state agencies who too often

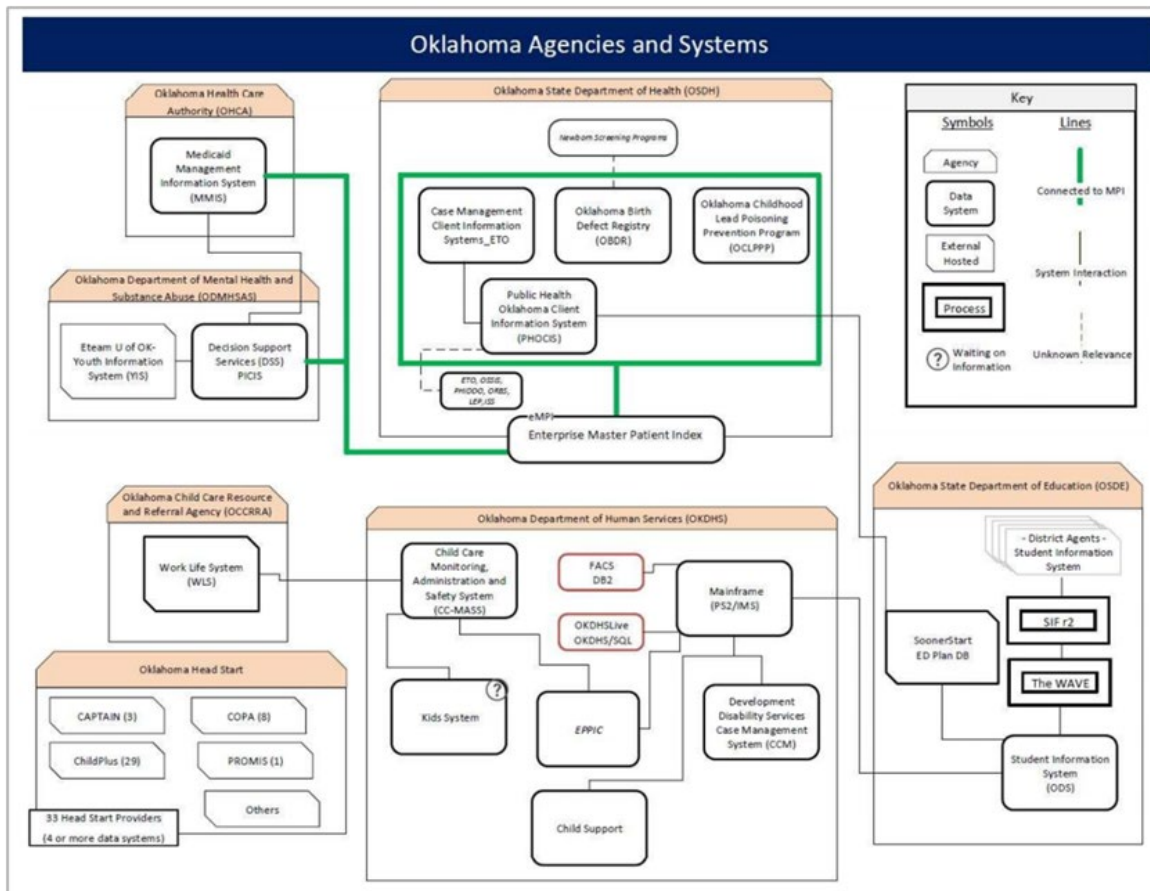
<sup>44</sup> In January 2017, the OSDE Office of Special Education Services implemented a mechanism to create a unique identifier (a student testing number or STN) that stays with children from initial eligibility for the SoonerStart program through graduation from high school.

<sup>45</sup> [A PLAN FOR AN EARLY CHILDHOOD INTEGRATED DATA SYSTEM IN OKLAHOMA](#)



are serving the same families and children with either the same or different programs.

Figure 06: Oklahoma Early Childhood Education Data Landscape Map. (This figure illustrates the complexity of the State's current data governance and structure for data on early childhood education.)



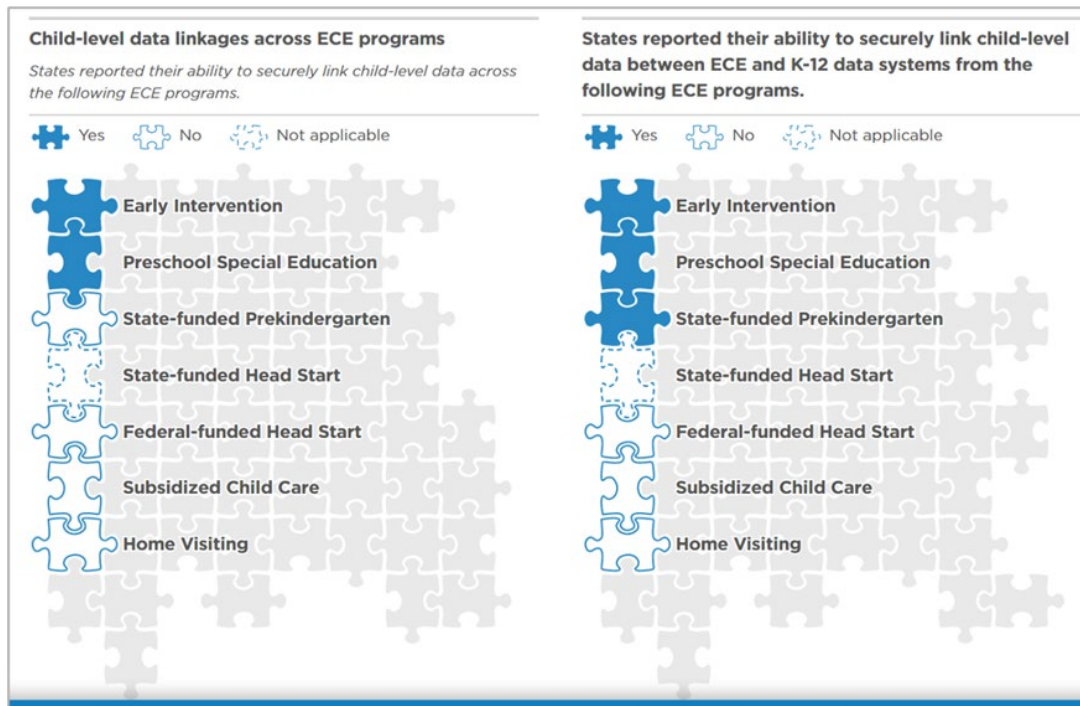
Source: OPSR

A 2018 national study from the Early Childhood Data Collaborative (ECDC) confirmed Oklahoma's challenges linking early childhood data with various programs including pre-kindergarten, Head Start, subsidized childcare and home visiting.<sup>46</sup> Head Start partners with local school districts to provide early learning for students who may also be utilizing Oklahoma's universal pre-k, but according to ECDC's latest report, these two programs are unable to share and link data.

<sup>46</sup> [2018 State of State Early Childhood Data Systems](#)



Figure 07: Oklahoma Child-level Data Linkages. (This figure illustrates Oklahoma’s challenges linking child-level data across early childhood-centric programs.)




Source: The Early Childhood Data Collaborative (ECDC)

### Policymakers Lack Comprehensive Data Required to Assess Early Childhood Investments, Evidence-Based Policies and Performance Outcomes.

Per the scope of this evaluation, LOFT did not seek to examine the performance of Oklahoma’s ECE system. However, LOFT examined whether state agencies had set performance metrics and outcomes for children (B-5) served.

Discussions and survey results from the Oklahoma State Department of Education (OSDE) confirm that the State’s early childhood programs primarily focus is on collecting data on student and family demographics and the number of families served. Under federal requirements for both SoonerStart (IDEA) and Special Education – Preschool (IDEA Part B), there are specific requirements to collect data and produce annual reports for the agencies’ efforts in reaching targeted goals related to services for families and children.<sup>47</sup> These federal



**OKLAHOMA Education**

Oklahoma’s Pre-Kindergarten (Pre-K) program is committed to providing all 4-year-olds access to developmentally appropriate classrooms so they can attain the academic and personal skills necessary to be ready for school.

Children Served: In FY20, Universal Pre-K served 42,683 children.

<sup>47</sup> There are 12 data collections authorized under the *Individuals with Disabilities Education Act (IDEA)* Section 618 under; 8 for Part B and 4 for Part C. [IDEA Section 618 Data Products: State Level Data Files \(ed.gov\)](https://www.ed.gov/idea/section-618-data-products)

metrics for annual reports are centered more on renewal and compliance with federal funding and not centered on measuring long-term outcomes for the State's B-5 population. According to State statute, one of the primary goals of the State's early intervention program, SoonerStart, is to reduce the cost of special education:

*“Reduce the educational costs to our society by minimizing the need for special education and related services after such children reach school age...”<sup>48</sup>*

Despite having both federal data collection and reporting requirements and a specified intent and performance outcome listed in State statute, no in-depth assessment has been conducted nor presented to the State to determine the impact of SoonerStart. In conversations with OSDE, the agency confirmed that an assessment of the program's impact on minimizing the need and cost for special education, as listed in statute, has not been conducted nor presented to State leaders.

OSDE confirmed they “do not collect or track performance information” for Universal Pre-K. OSDE did frequently reference the National Institute for Early Education Research (NIEER) annual reports measuring both the percentage of Oklahoma school districts offering Pre-K and the percentage of 4-year-olds utilizing the program. **However, this metric only measures access and not performance of educational and cognitive development, two distinct variables.** To date, OSDE has not conducted an in-depth research or performance evaluation to assess if the State's Universal Pre-K or other early childhood programs have made an impact on students' academic outcomes.<sup>49</sup> LOFT's research found that other states have completed performance-based assessments on their respective prekindergarten programs to analyze academic outcomes, inform stakeholders and identify return on investments.<sup>50</sup>



### State Example - Alabama

The Alabama Department of Early Childhood Education has conducted multiple evaluations and assessments of their State's First Class Pre-K program to determine academic outcomes and analyze Alabama's return on investment. A 2020 evaluation found students enrolled in Alabama's First Class Pre-K program were less likely to be retained; saving the state nearly \$126.8 million in K-12 education costs

Throughout LOFT's evaluation, OSDE frequently referenced metrics measuring both the percentage of Oklahoma school districts offering Pre-K and the percentage of 4-year olds utilizing the program. However, this metric only measures access and not performance of educational and cognitive development, two distinct variables.

<sup>48</sup> O.S. 70 § 13-122

<sup>49</sup> OSDE provided LOFT two research studies from 2006 conducted on a small sample population of Tulsa's Pre-K program, but this 15-year old study fails to reflect the performance of the entire State's Pre-K program.

<sup>50</sup> [Research and Evaluation – Early Childhood Education \(alabama.gov\)](https://www.alabama.gov/research-and-evaluation-early-childhood-education)

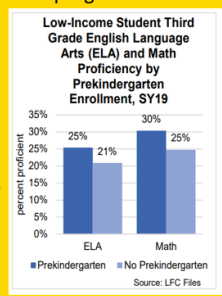
According to OSDE, measuring reading sufficiency rates (RSR) of kindergartners through third grade would be a direct performance metric to correlate with the State’s ECE programs and services. While this data is maintained by OSDE, it is not presented in any of the agency’s reports. Using data from both OSDE and OPSR, LOFT was able to illustrate how early learning metrics could be used as a tool for assessing outcomes.



### State Example – New Mexico

New Mexico has done extensive research on performance outcomes of their state’s early childhood programs and services. The New Mexico Legislative Finance Committee (LFC) has consistently found their state prekindergarten program to improve both math and reading proficiencies for low-income 4-year olds and lower special education and retention rates.

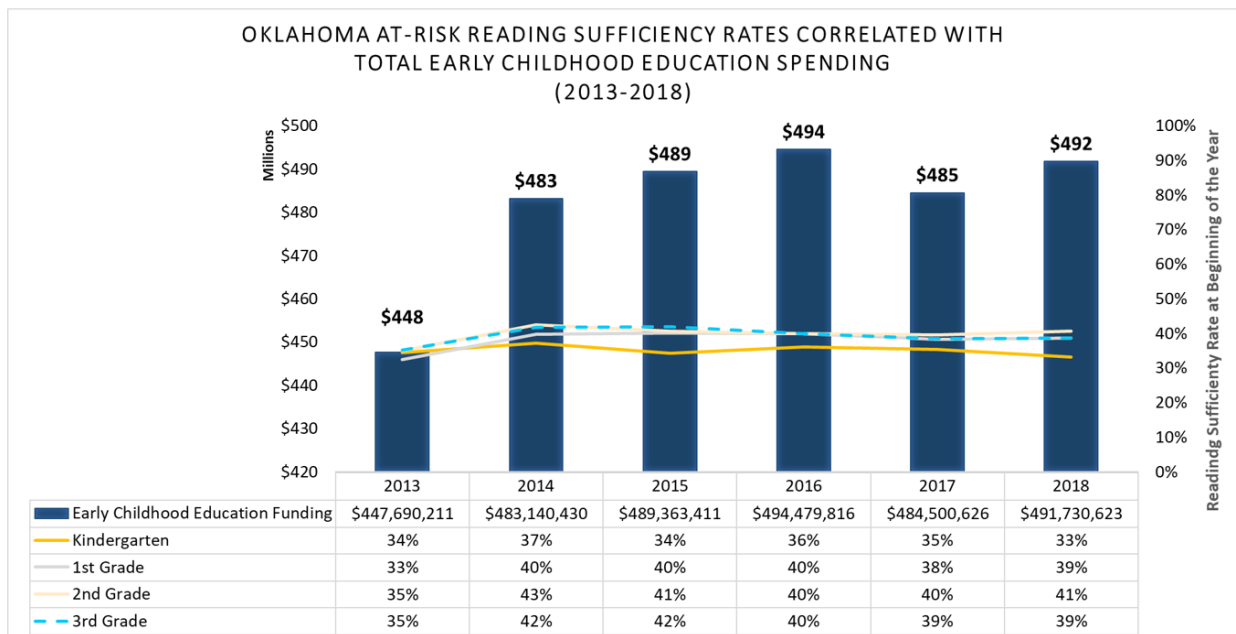
New Mexico LFC has also found prekindergarten to deliver higher academic outcomes for students based on improvement in test scores through the 11<sup>th</sup> grade. New Mexico’s LFC FY19 Early Childhood Accountability Report notes low-income students who participated in prekindergarten performed better on third grade reading and math assessments than their student peers not participating.



Low-Income Student Third Grade English Language Arts (ELA) and Math Proficiency by Prekindergarten Enrollment, SY19

Source: LFC Files

*Chart 13: Oklahoma Reading Sufficiency Rates Correlated with Total Early Childhood Education Spending (2013-2018). (This chart illustrates the 5-year trend of total investments for early childhood education programs; increasing by 10 percent between FY13-18 and that at-risk reading sufficiency rates are increasing as students matriculate through the education system.)*



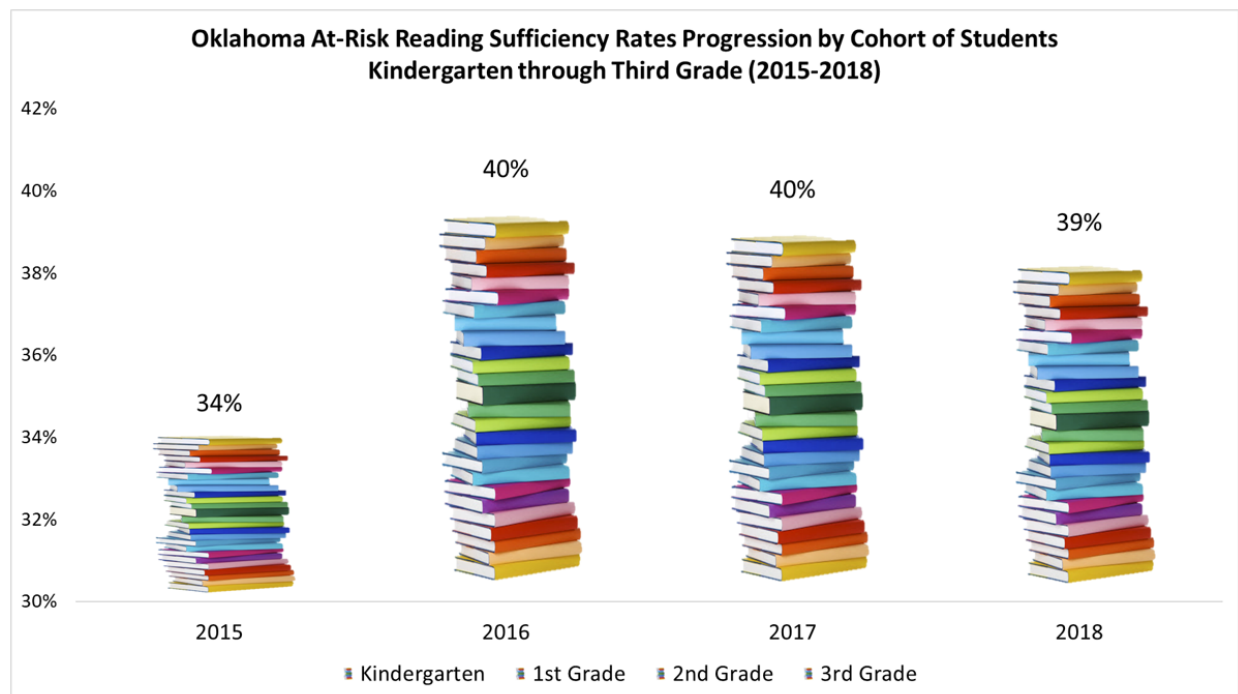
Source: Legislative Office of Fiscal Transparency’s analysis based on data from OSDE.

As illustrated in Chart 13, the total investment, from all sources, for ECE has increased by 10 percent since FY13. Yet, Oklahoma’s Reading Sufficiency Rates (RSR) illustrate, on average, 35 percent kindergartners begin the school year with an at-risk RSR. **LOFT’s analysis also finds that as students matriculate through the State’s education system their at-risk status for reading sufficiency rises. On average, 40 percent of third graders begin the school year with an at-risk RSR, a five percent increase from kindergarten.** Chart 13 also illustrates that at-risk RSR are increasing over time. For example, in 2013, 35 percent of second graders had an at-risk

RSR but the 2018 second grade cohort had a 41 percent RSR. The same trends can also be seen for first graders in Chart 13, as in FY13 the at-risk RSR was 33 percent but increased to 39 percent in FY18; a 6 percent increase.<sup>51</sup>

Below, Chart 14 illustrates that the at-risk RSR increases for cohorts of students.

*Chart 14: Oklahoma At-Risk Reading Sufficiency Rates Progression by Cohort of Students Kindergarten Through Third Grade (2015-2018). (With Reading Sufficiency Rates, the lower the number the fewer students who are at risk for not being sufficient readers by the third grade. The data demonstrates that more students are at-risk for not being sufficient in reading as they progress from Kindergarten through third grade.)*



Source: Legislative Office of Fiscal Transparency's analysis based on data from OSDE.

Note: At-Risk RSR shown are reflected from beginning of year (BOY)

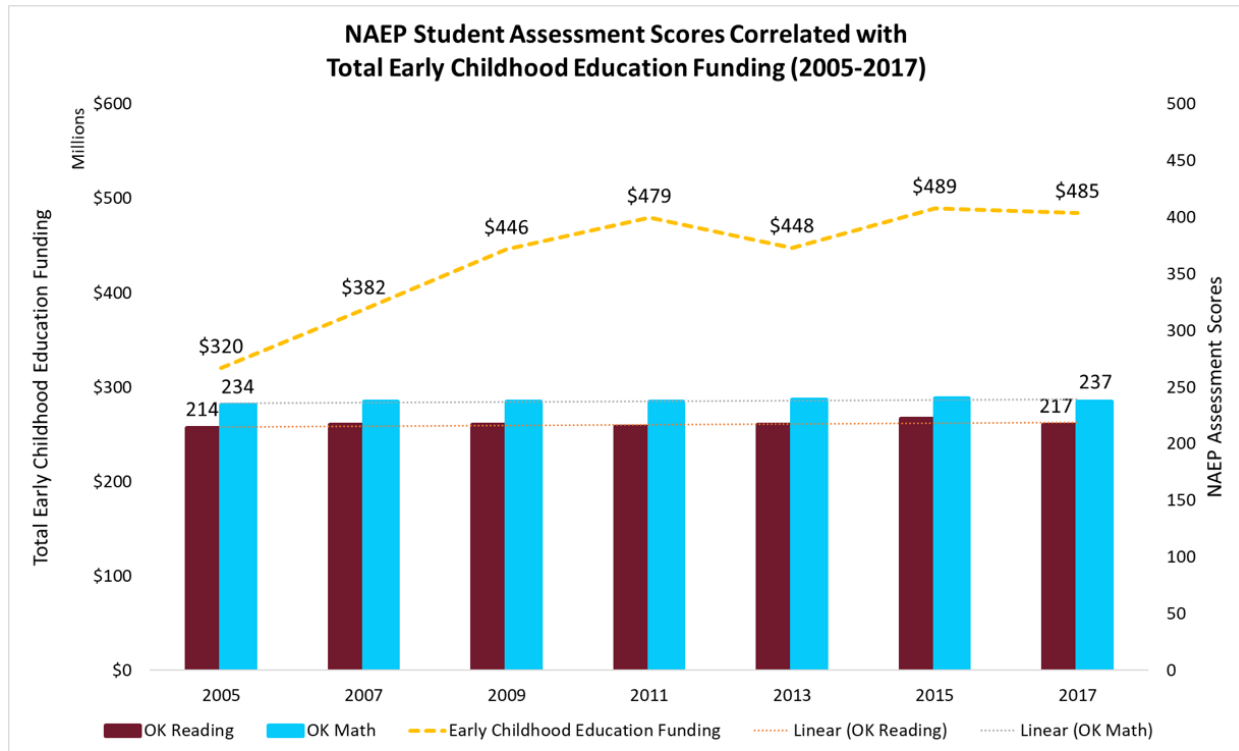
In FY15, 34 percent of kindergartners had an at-risk RSR, yet that same cohort of students began the first and second grade with an at-risk RSR of 40 percent. By third grade, 39 percent of the same cohort of kindergarten students from FY15 still had an at-risk RSR. LOFT's analysis shows a linear and stable increase in at-risk RSR for Oklahoma students. **In 2020, 44 percent of all Oklahoma kindergarten through third grade students had an at-risk RSR.**<sup>52</sup>

This trend is also observed in Oklahoma's reading and math scores from the National Assessment of Educational Progress (NAEP). LOFT finds that despite significant investments in early childhood education spending, student assessment scores from Oklahoma fourth graders reflect minimal advances in academic performance.

<sup>51</sup> According to OSDE, in 2017, the State Board of Education approved a new list of RSA screeners, representing more rigorous thresholds for what it means for students to be reading ready in kindergarten.

<sup>52</sup> Please refer to Appendix V for longitudinal trend of at-risk reading sufficiency rates from kindergarten through third grade students.

*Chart 15: NAEP Student Assessment Scores Correlated with Total Early Childhood Education Spending (2005-2017). (This chart illustrates despite significant investments in early childhood education spending, the trend of Oklahoma fourth graders' math and reading NAEP scores remains relatively flat over the last 12 years.)*



Source: Legislative Office of Fiscal Transparency's analysis based on data from OPSR and NAEP.

**LOFT's analysis reveals that between FY05 through FY17, total early childhood education spending increased by 52 percent but Oklahoma fourth grade NAEP assessment scores remained relatively flat.** These findings raise questions regarding the link between funding and outcomes that LOFT is not equipped to answer through this evaluation.

During fieldwork, LOFT learned that OSDE's SoonerStart is launching a performance-based pilot study beginning in August 2021 under the State Systemic Improvement Plan (SSIP). Beyond standard federal reporting requirements, this is the only performance-based review LOFT identified as currently in progress for the State's ECE programs.

**Without transparent and accessible data, Oklahoma families are unable to make evidence-based decisions whether to utilize the State's ECE programs, to include Pre-K.** Transparent performance data on the State's ECE programs would also equip State leaders to make data-driven decisions regarding the investments, alignment and strategic goals of the State's early childhood system.

As part of this evaluation, LOFT reviewed all 50 states' early childhood systems and identified ways they are effectively using data in policy decisions.

## Early Childhood Integrated Data Systems

States have a wide range of strategies for managing early childhood data, including developing new data systems, enhancing existing systems, or linking agency systems across diverse programs. **An effective way states are streamlining the process of integrating and using early childhood data is by developing an early childhood integrated data system (ECIDS).** An ECIDS collects, integrates, maintains, stores, and reports information from early childhood programs across multiple state agencies that provided early childhood-centric services to families and children. **The 2018 ECDC survey found that 18 states have implemented and utilize a centralized database to secure and report information from all state early learning services and programs.**<sup>53</sup>



### State Example – North Carolina

North Carolina's Early Childhood Integrated Data System (ECIDS) can link data across all B-5 sectors and services; leverage individual, child-level linkages to understand the needs of families and children.

North Carolina's ECIDS also uses a unique identifier assigned to children to follow and track the progress of children through the early childhood system. The system uses aggregate data to inform and guide policy decisions around population-level needs across B-5 at the local, county, regional and state levels. The system provides timely accessible and accurate data to generate custom reports based on geographic location, services utilized, race, gender and more.

LOFT's review found Georgia, Minnesota, North Carolina, and Illinois as having strong systems for collecting data, mapping resources, and disseminating timely, accessible, and detailed information to state policymakers and other key stakeholders.<sup>54</sup>

Illinois, through data embedded within their ECIDS, has the capabilities to create a publicly accessible asset map for early childhood programs and services. Illinois' early childhood asset map can pinpoint specific local programs partnering with their state programs like preschool or Head Start and can even isolate programs by county, school district, municipality, and even their respective state legislative districts.<sup>55</sup>


Minnesota also utilizes an ECIDS, developed from funding from the federal Race to the Top Early Learning Challenges Grant, and continues to further enhance it with funding from a federal IES Statewide Longitudinal Data System grant. This online, interactive database allows state agencies to consolidate data into a comprehensive system from which state policymakers can review annual performance reports, outcomes, and return on investments for early childhood programs.<sup>56</sup>

<sup>53</sup> Please refer to Appendix O for States Linking Child-Level Data Across ECE Programs.

<sup>54</sup> Please refer to Appendix P for an example of a report from North Carolina's ECIDS. [Total and Unduplicated Number by NC ECIDS Service](#)

<sup>55</sup> Please refer to Appendix Q for a screenshot from Illinois Early Childhood Asset Map. [Maps & Visualizations | IECAM \(illinois.edu\)](#)

<sup>56</sup> Please refer to Appendix R for Minnesota ECLDS Report. [Minnesota ECLDS \(mn.gov\)](#)



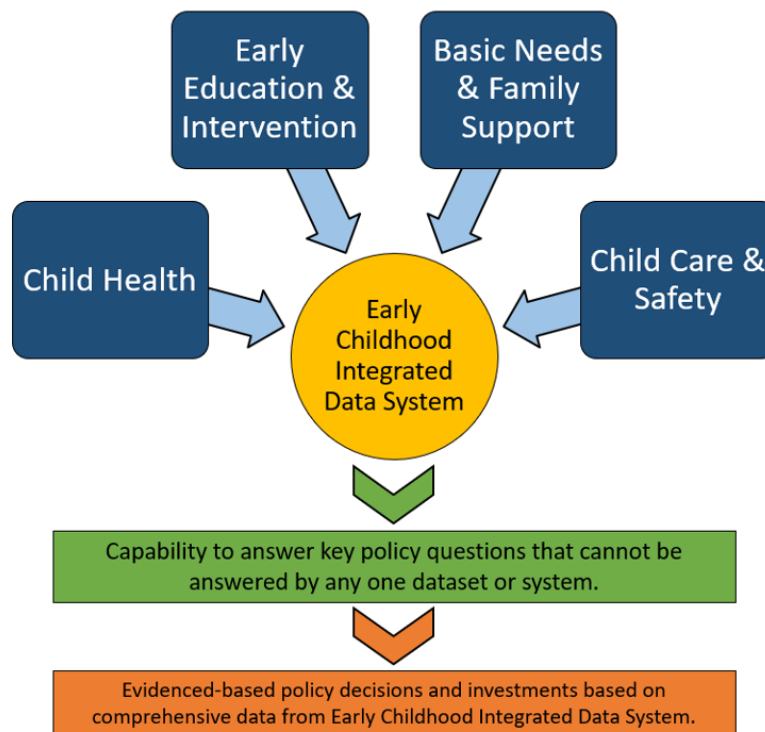
### State Example – Georgia

Georgia’s Cross Agency Data System (CACDS) aligns critical data from all six major early care and education programs and services for children zero to five and their families. Georgia’s CACDS works to identify service gaps, create opportunities for analysis and research, and to provide an integrated and aligned approach to demonstrate how the state is meeting the needs of its youngest learners.

### Oklahoma’s Capabilities with an ECIDS

With an ECIDS, Oklahoma state leaders would be better equipped to assess, target and improve specific early childhood program investments and services to meet the needs of Oklahoma families and children. A linked data system would also provide accurate data to State policymakers on the number of Oklahoma families and children being served, assist in removing duplication of services, streamline funding, and be better informed on program outcomes.<sup>57</sup>

*Figure 08: Theoretical Framework for Early Childhood Integrated Data System. (This figure illustrates how data could be collected from various early childhood programs and centralized to generate reports for agencies and policymakers to make evidenced-based policy decisions.)*



Source: Legislative Office of Fiscal Transparency’s creation.

<sup>57</sup> The Oklahoma State Department of Education launched the Oklahoma Early Learning Inventory (ELI) in August of 2021. The ELI is modeled after the New Mexico Kindergarten Readiness assessment. OSDE is conducting a study of the tool’s effectiveness in the 2018-2019 school year with 11 school districts.

Linked early childhood data would allow for the evaluation of long-term outcomes of early learning, specifically for school readiness as well as both behavioral and health outcomes. Additionally, the data could demonstrate the cost-benefit of early childhood investments from the relationship between early childhood funding and early academic performance indicators such as kindergarten through third grade reading levels, similar to the assessments done by both Alabama and New Mexico.

An ECIDS program also has the potential to help identify Oklahoma families and children currently not enrolled in services they qualify for. For example, a single mother enrolled in SoonerCare would be automatically linked to other state agencies' resources and programs to include WIC, SNAP and other early childhood-centric services to provide a comprehensive approach to address their needs. In North Carolina, data integration has enabled administrators to identify children who are eligible for, but not attending, state-funded pre-kindergarten.

A recent report from OPSR estimates that it would cost anywhere between \$3.4 and \$4.5 million annually to develop and implement an ECIDS for the State.<sup>58 59 60</sup>

## Agency Recommendations

- The Oklahoma State Department of Education should work to improve the quality, quantity, and transparency of data for Pre-K metrics to allow for more targeted analysis and investments.
- The Oklahoma State Department of Education should conduct, or contract with a research institution to conduct, a performance evaluation of the State's entire Universal Pre-K program to determine the program's impact on academic success for students and return on investment for the State.
- The Oklahoma State Department of Education should develop an intake questionnaire from families with children entering Pre-K to determine what early childhood services students have received prior to entering Pre-K.
- The Oklahoma State Department of Education should collaborate further with the Oklahoma Partnership for School Readiness and other state agencies to develop and present a plan to the State Legislature for an Early Childhood Integrated Data System.

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<sup>58</sup> [A Plan for an Early Childhood Integrated Data System in Oklahoma](#)

<sup>59</sup> Please refer to Appendix S for Preliminary Five-year Cost Estimate for Oklahoma ECIDS.

<sup>60</sup> OPSR report states the ECIDS will cost between \$2.9-3.9M in Year One, \$4-5.2M in Year Two, \$4.1-5.3M in Year Three, \$3.1-4.2M in Year Four, and \$3.1-4.1M in Year Five onward.



## Appendices

### Appendix A: Methodology

#### Oklahoma Constitution, Statutes and Agency Policies

LOFT incorporated legal research methodology for a detailed analysis of state laws and governing policies found in various sources (constitution, statutes and administrative rules) to assist with the legislative history of Oklahoma's early childhood education, revenues sources, program's eligibility, requirements and policy considerations.

#### Scoping of Early Childhood Programs and Services

As discussed in the evaluation's introduction section, LOFT narrowed the specific scope of this evaluation to programs, services or public-assistance with the specific aim of enhancing the early education of Oklahoma's children from birth to five years old (B-5). Additionally, American Indian and Alaska Native (AIAN) Head Start was excluded from the evaluation.

#### Inventory of Oklahoma's Early Childhood Programs

LOFT developed and distributed a survey to all identified child-serving agencies in the State to identify their programs that provide goods, services or public assistance with the specific aim of enhancing the health, safety, or well-being of Oklahoma's children. LOFT surveyed the agencies to gather data on the populations they serve, the types of services they provide, funding streams, data collection and reporting and community partnerships.

#### Fiscal Analysis of Early Childhood Funding

For the fiscal analysis and mapping of the State's early childhood system, LOFT developed and distributed a survey to all identified child-serving agencies to collect funding data from any and all revenue sources. Not all surveys were complete, and some were missing specific data related to funding sources. For this reason, LOFT requested previously verified data from the Oklahoma Partnership for School Readiness (OPSR) in which the organization used for their OKFutures Strategic Plan joint report with the Urban Institute. OPSR's report utilized this data to create their report under the requirements of their Preschool Development Grant Birth through Five Initiative (PDG-5) from the U.S. Department of Health and Human Services. LOFT was provided the raw data set from OPSR and conducted its own independent analysis for this priority evaluation. **LOFT's analysis yields a conservative estimate of the annual fiscal level of funding for early childhood based on the lack of complete funding data from all sources related to specific early childhood programs and services.**

*The contents of this report were discussed with the OSDE throughout the evaluation process. Additionally, sections of this report were shared with the various agencies and stakeholders for purposes of confirming accuracy. It is the purpose of LOFT to provide both accurate and objective information: this report has been reviewed by LOFT staff outside of the project team to ensure accuracy, neutrality, and significance.*

## Appendix B: Critical Scope Considerations

On August 13, 2020, the Legislative Oversight Committee approved the first annual workplan for LOFT. Within the workplan LOFT was directed to provide an overview of all publicly funded early childhood programs, including their funding sources, how they are delivered, and to whom.

Although this evaluation's scope appears straightforward, it is complex because programs and services are characterized by myriad approaches, problems addressed, and specific target populations served. Programs structures vary widely; services may be direct or indirect and programs and may fall within the responsibilities of two or more state agencies thus complicating the categorization of programs operating within the State. One agency may receive the direct appropriation and provide primary administration responsibilities of the programs, but other state agencies assist with the delivery of services. Many programs also receive funding from federal or private sources. Inasmuch as there is a demand to understand the State's approach for providing early child education programs and services for families and children, there is a need to create a focused inventory to identify the programs and funding streams that target them within the State.

### Is it Early Childhood Education and Care (ECEC) or Early Childhood Education (ECE)?

A central focus area for early childhood evaluations is the scoping of programs and services being delivered to families and children. States vary in their approach to identifying, governing and addressing early childhood by either incorporating or separating the care element of early childhood. Additional state and federal programs may complement and provide support to early learning and education initiatives, but their primary purpose is not specifically targeted for early learning or development.

For example, the Temporary Assistance for Needy Families (TANF) program is a federal assistance program under the U.S. Department of Health and Human Services that can be supportive but is not predominantly centered on early learning. TANF funds can be used for child care assistance at a state's direction. According to the U.S. Department of Health and Human Services, in 2019 Oklahoma allocated 25.5% of TANF funds to child care.<sup>61</sup> However, federal program's definition clearly identifies child care as a means to support parents to attend work, participate in work activities or for respite purposes. Thus, the primary purpose of this program's capability is to support working parents and not primarily focused on enhancing children's early learning.

### Is this Birth to 5 or Birth to 8?

A critical scoping question states face in discussing policy and performance evaluations of early childhood is deciding on the age range of children. LOFT found many states identify early childhood as from birth to 5 years (B-5), while other states have more inclusive definitions; including education and learning through the third grade or 8 years old.<sup>62</sup> States vary in their

<sup>61</sup> [FY2019 TANF and MOE Spending and Transfers by Activity \(hhs.gov\)](https://www.hhs.gov/fy2019-tanf-and-moe-spending-and-transfers-by-activity)

<sup>62</sup> Examples include First Five California (<http://www.cffc.ca.gov/>) and First Five Nebraska (<http://www.firstfivebraska.org/>).

definition when framing early childhood governance; including Oklahoma. During the evaluation neither a clear nor universal answer was provided to LOFT on the State’s definition of early childhood. Discussions with various stakeholders in the early childhood arena described B-5 as the most critical developmental period for early learning as this critical time frame profoundly shape children’s academic trajectories in pre-kindergarten through third grade.

**LOFT’s Scope for Early Childhood Evaluation**

For the purpose of this evaluation, LOFT centered on early childhood programs and services targeted for Oklahoma children specifically for the primary mission of early learning or development between birth and 5-years old (B-5).

*Table 09. Parameters Defining Programs Included in the Scope of the Evaluation. (This table list criteria the LOFT evaluation team used to narrow the scope of the inventory of programs to be evaluated.)*

<b>Criteria</b>	<b>Included</b>	<b>Excluded</b>
<b>Funding</b>	Revenue streams that expended or allocated funds for programs or services to enhance the early learning and/or development of children age birth to five years old (B-5)	Individual contractual providers
<b>Targeted Population</b>	Children age birth to five years old (B-5)	Youth 6 years and older
<b>Program Focus</b>	Central mission/focus on early learning and/or development	Central focus on care, not early learning. Programs that impacted but did not specifically target children age birth to five-years old (B-5) for early learning.

*Legislative Office of Fiscal Transparency's creation based on objectives from Legislative Oversight Committee.*

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## Appendix C: Stakeholder Interviews

This evaluation report summarizes and utilizes collected information from key stakeholders working within Oklahoma’s early childhood education system and within the realm of early childhood.

Interviews were conducted with stakeholders from:

- Alabama Department of Early Childhood Education
- American Institute of Research
- Community Action Project of Tulsa (CAP Tulsa)
- Connecticut Office of Early Childhood
- Early Childhood Education Institute, University of Oklahoma- Tulsa
- George Kaiser Family Foundation
- Georgia Department of Early Care and Learning
- Head Start
- Interagency Coordinating Council (ICC)
- National Conference of State Legislatures
- North Carolina Program Evaluation Division
- New Mexico Legislative Finance Committee
- Oklahoma Health Care Authority
- Oklahoma Office of Management and Enterprise Services
- Oklahoma Policy Institute
- Oklahoma State Department of Education
- Oklahoma State Department of Health
- Oklahoma Department of Human Services
- Oklahoma State Legislature
- Oklahoma State Regents for Higher Education
- Oklahoma Partnership for School Readiness

## Appendix D: Early Childhood Education Relevant Statutes

### Authorization for Designating Lead Agency

**42 U.S.C. §9858b** – Grants the Governor of a State to designate an agency to administer the Child Care and Development Fund (CCDF).

**20 U.S. Code § 1435** – Grants the Governor to designate a lead agency for the general administration and supervision of programs and activities for IDEA Part C.

### General

**O.S. 10 § 640.1** - Creates the Oklahoma Partnership for School Readiness, requiring the Board to serve as the state’s Early Childhood Advisory Council, fulfill the responsibilities described in the Head Start Act of 2007, and outlining responsibilities [O.S. 10 § 640.2] of the Board.

### Early Childhood Education

**O.S. 70 § 10-105.4** - Requires an early childhood pilot program to serve at-risk children.

**O.S. 70 § 18-108** - Statute provides that legislative intent is to provide a free public kindergarten for every five-year-old child in this state, with the requirement that each district offers full day kindergarten.

**O.S. 70 § 11-103.7** - Allows districts to offer to four-year-olds the opportunity to participate in an early childhood education program.

**O.S. 70 § 13-122** - The Oklahoma Early Intervention Act (SoonerStart) intends to fulfill the requirements of IDEA Part C by providing early intervention services to infants and toddlers with disabilities and their families.

### Coordination of Services and Funds Allocated for Early Childhood Services

**O.S. 70 § 13-124** – Designates the Oklahoma State Department of Education as the lead agency for general administration, supervision and monitoring of programs and activities receiving federal funds under Part C of the Individuals with Disabilities Education Act (IDEA) and state funds appropriated for early intervention services.

Requires all financial resources from federal, state, local and private sources shall be coordinated to fund early intervention services. Requires a joint funding plan shall be submitted to the Governor, the Speaker of the House of Representatives, and the Senate President Pro Tempore by the State Department of Education, the State Department of Health, the Department of Human Services and the Department of Mental Health and Substance Abuse Services on or before October 1.

**O.S. 70 § 13-125** – Requires a contract between the Oklahoma State Department of Health and the Oklahoma State Department of Education specifying the provision or arrangement of early intervention services by the Oklahoma State Department of Health. The contract should include an explanation of individual and shared responsibilities for planning, administration and funding, multi-disciplinary evaluations, development of an individual family service plan, service

delivery, procedural safeguards and liability of both agencies. Additional items are also to be included in said contract.

**O.S. 70 § 13-124.1** – Creates the Oklahoma Early Intervention Revolving Fund. All monies of the fund are appropriated and may be budgeted and expended by the Oklahoma State Department of Education for the purpose of providing early intervention services to children with disabilities in accordance with Part C of the Individuals with Disabilities Education Act (IDEA) and the Oklahoma Early Intervention Act.

**O.S. 70 § 13-122** – Requires SoonerStart to be delivered and supported by the State Department of Education, Oklahoma State Department of Health, the Department of Human Services, the Department of Mental Health and Substance Abuse Services and other publicly funded services for infants and toddlers with disabilities and their families.

**O.S. 74 § 5035** – Designates the Oklahoma Department of Commerce to receive Community Services Block Grant Funds appropriated, authorized or allocated for usage within the State of Oklahoma by the United States Government.

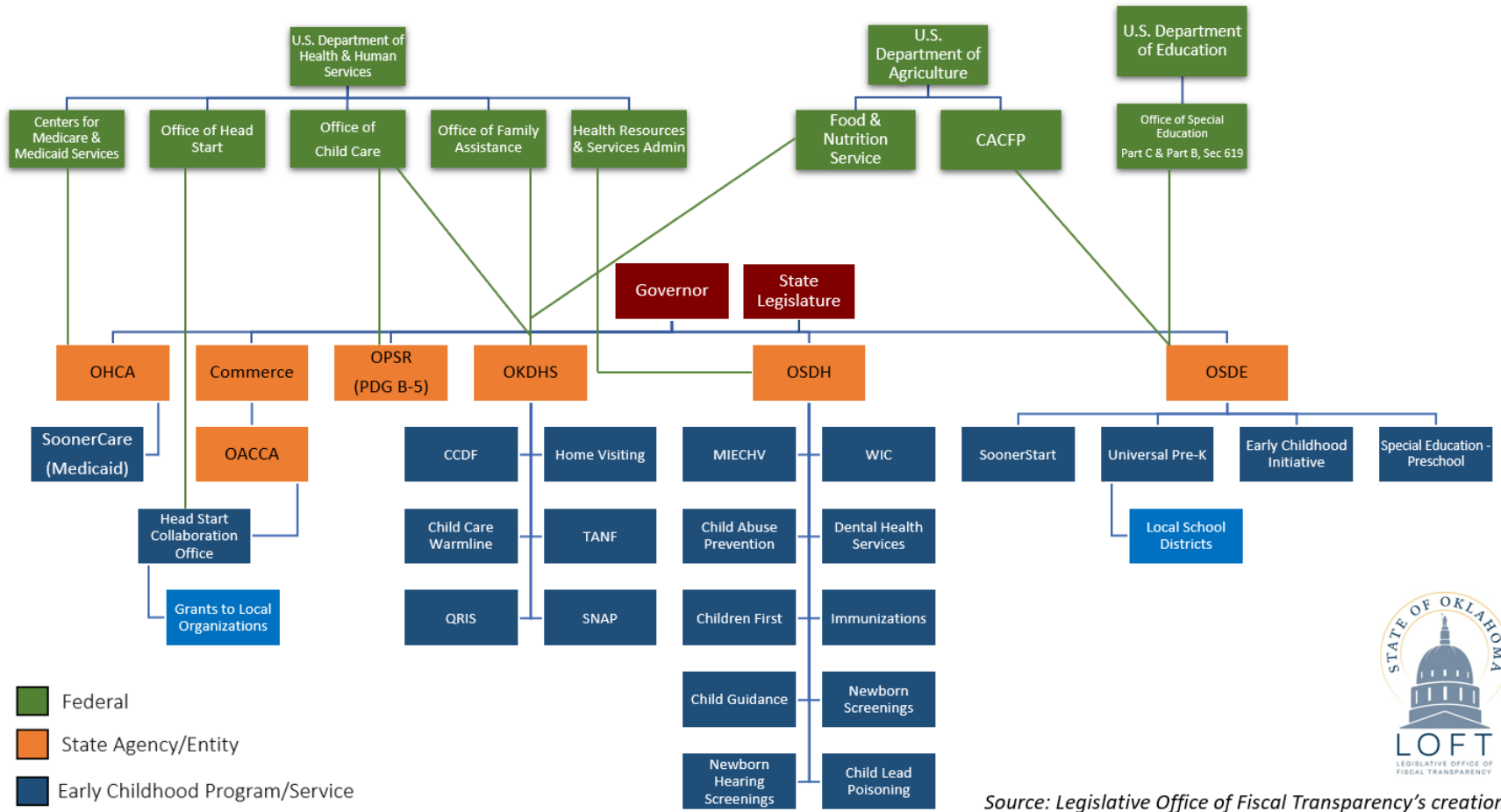
**O.S. 70 § 1-114.2** – Authorizes schools districts to operate as a grantee of a federal Head Start program. For purposes of calculating state aid, a school district may not count any child enrolled in or teacher employed by a Head Start program operated by the district for the portion of the day federal Head Start funds or state funds appropriated for Head Start programs are received.

### **Data Collection and Sharing**

**O.S. 70 § 13-128** – Requires the Oklahoma State Department of Education to meet the data collection and reporting requirements for the State of Oklahoma under Part C of the Individuals with Disabilities Education Act (IDEA). Further, the Oklahoma State Department of Health, the Department of Human Services and the Department of Mental Health and Substance Abuse Services shall fulfill the data collection and reporting requirements established by the United States Department of Education pursuant to Part C of the Individuals with Disabilities Education Act (IDEA) for early intervention services provided by their respective agencies pursuant to the purposes of the Oklahoma Early Intervention Act.

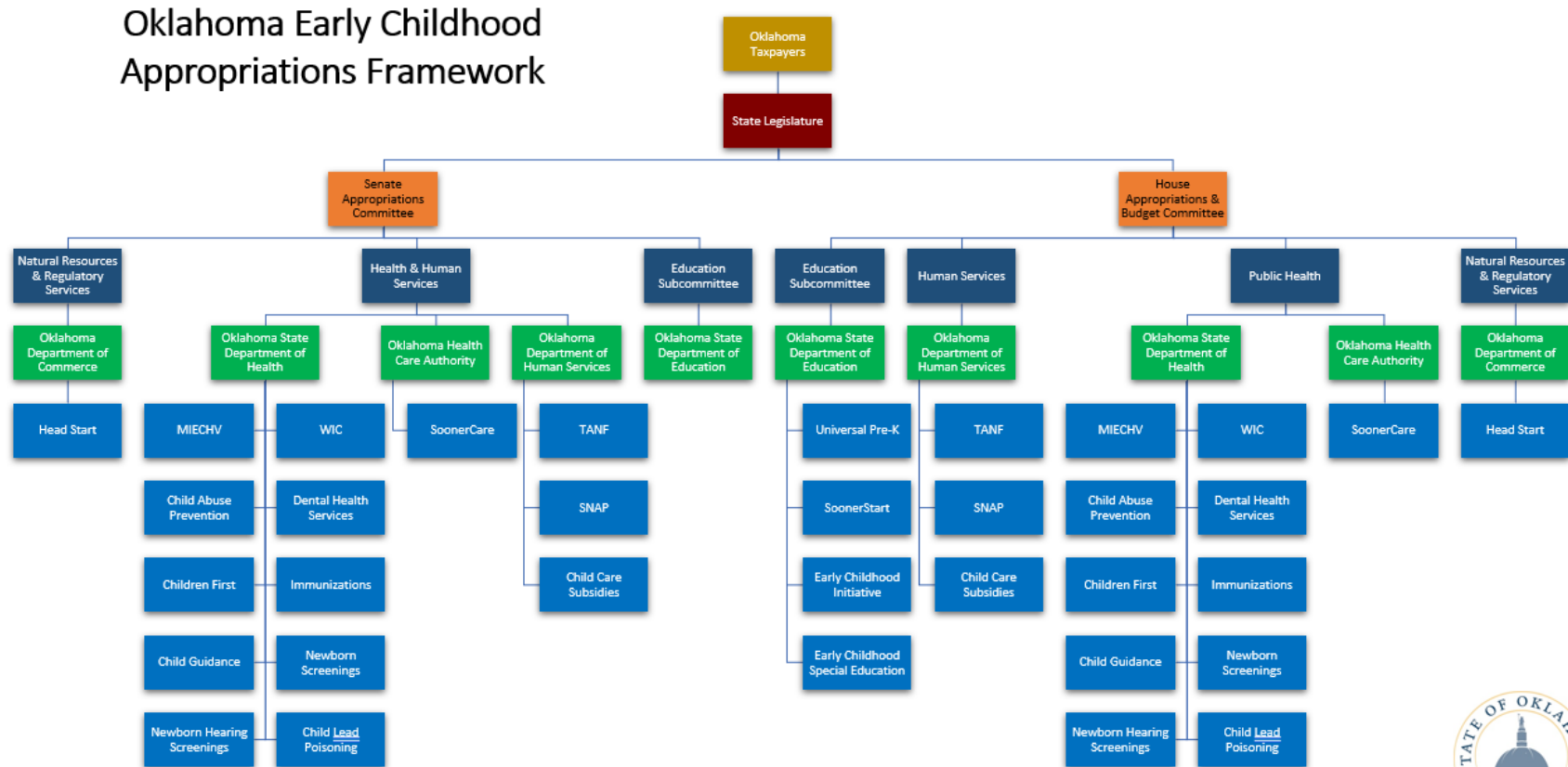
## Appendix F: Oklahoma’s Early Childhood System Governance Structure

Figure 09: Oklahoma’s Early Childhood System Governance Structure. (This figure illustrates the State’s early childhood ecosystem, consisting of federal agencies distributing funds for early childhood services administered by various state agencies.)



## Appendix G: Oklahoma Early Childhood Appropriations Structure

Figure 10: Oklahoma Early Childhood Appropriations Structure. (This figure illustrates the State’s appropriation structure for all agencies administering early childhood programs.)



Source: Legislative Office of Fiscal Transparency’s creation.





## Appendix H: Early Childhood Governance Models by State.

Table 10. Early Childhood Governance Models by State. (This table illustrates the governance model of states.)

State	Governance Entity	Governance Model
Alabama	Alabama Department of Early Childhood	Created
Alaska	not applicable	Coordinated
Arizona	not applicable	Coordinated
Arkansas	Arkansas Department of Human Services, Division of Child Care and Early Development	Consolidated
California	not applicable	Coordinated
Colorado	Colorado Department of Human Services, Office of Early Childhood	Coordinated
Connecticut	Connecticut Office of Early Childhood	Created
Delaware	Delaware Department of Education, Office of Early Learning	Consolidated
District of Columbia	D.C. Office of State Superintendent of Education, Division of Early Learning	Consolidated
Florida	Florida Department of Education, Office of Early Learning	Consolidated
Georgia	Georgia Department of Early Care and Learning	Created
Hawaii	Hawaii Executive Office of Early Learning	Coordinated
Idaho	not applicable	Coordinated
Illinois	Illinois Governor's Office of Early Childhood Development	Coordinated
Indiana	Indiana Family and Social Services Administration, Office of Early Childhood and Out-of-School Learning	Consolidated

<b>State</b>	<b>Governance Entity</b>	<b>Governance Model</b>
Iowa	not applicable	Coordinated
Kansas	not applicable	Coordinated
Kentucky	not applicable	Coordinated
Louisiana	Louisiana Department of Education	Consolidated
Maine	not applicable	Coordinated
Maryland	Maryland Department of Education, Division of Early Childhood	Consolidated
Massachusetts	Massachusetts Executive Office of Education, Department of Early Education and Care	Consolidated
Michigan	Michigan Department of Education, Office of Great Start	Consolidated
Minnesota	not applicable	Coordinated
Mississippi	not applicable	Coordinated
Missouri	Missouri Department of Elementary and Secondary Education, Office of Early Learning	Coordinated
Montana	Early Childhood and Family Support Division	Coordinated
Nebraska	not applicable	Coordinated
Nevada	Nevada Department of Education, Office of Early Learning and Development	Consolidated
New Hampshire	not applicable	Coordinated
New Jersey	not applicable	Coordinated
New Mexico	New Mexico Early Childhood Education and Care Department	Created
New York	not applicable	Coordinated
North Carolina	North Carolina Division of Child Development and Early Education	Consolidated

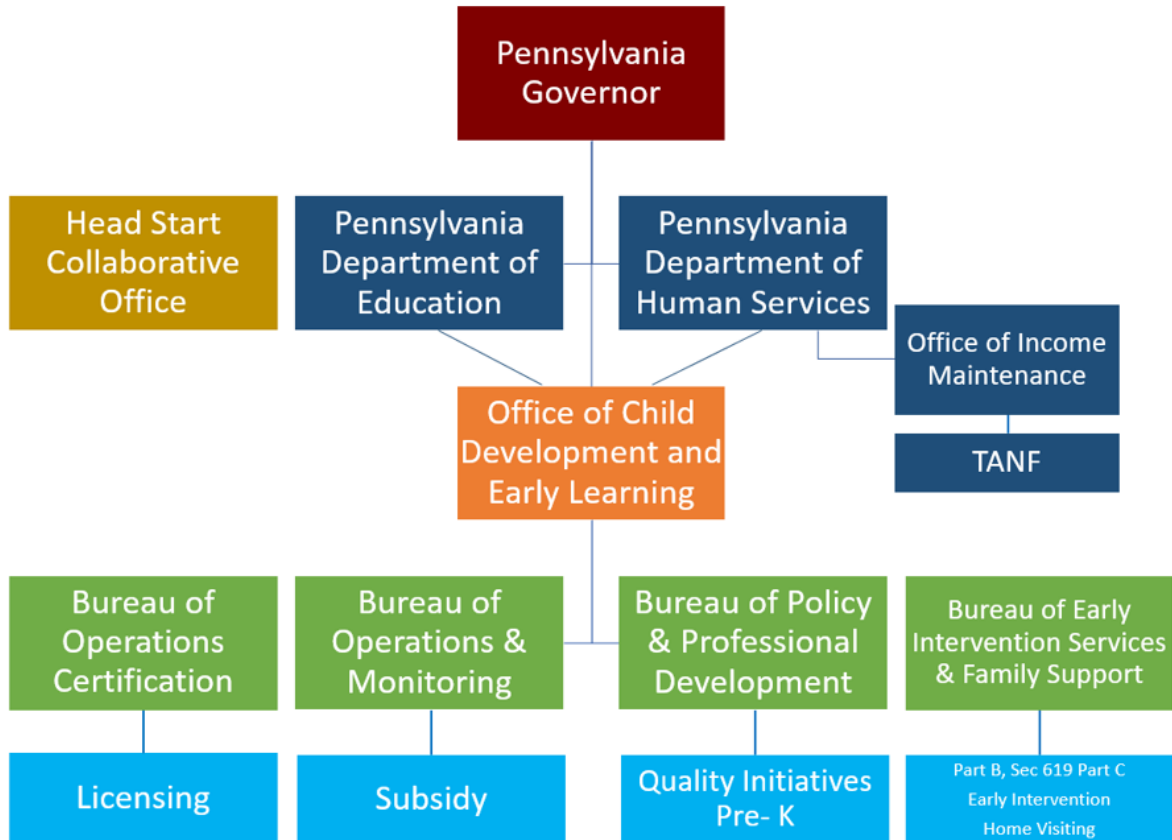
<b>State</b>	<b>Governance Entity</b>	<b>Governance Model</b>
North Dakota	not applicable	Coordinated
Ohio	not applicable	Coordinated
Oklahoma	not applicable	Coordinated
Oregon	Oregon Early Learning Division	Consolidated
Pennsylvania	Pennsylvania Office of Child Development and Early Learning	Consolidated
Rhode Island	not applicable	Coordinated
South Carolina	not applicable	Coordinated
South Dakota	not applicable	Coordinated
Tennessee	not applicable	Coordinated
Texas	Texas Education Agency	Coordinated
Utah	not applicable	Coordinated
Vermont	Vermont Child Development Division	Created
Virginia	not applicable	Coordinated
Washington	Washington State Department of Children, Youth, and Families	Created
West Virginia	not applicable	Coordinated
Wisconsin	not applicable	Coordinated
Wyoming	not applicable	Coordinated

## Appendix I: State Early Childhood Governance Model Examples

### Coordinated Governance – Pennsylvania

Figure 11: Pennsylvania Early Childhood Coordinated Governance Structure. (This figure illustrates Pennsylvania’s early childhood governance structure coordinating multiple programs primarily through one office overseen by two separate state agencies.)

### Pennsylvania Early Childhood Governance Model

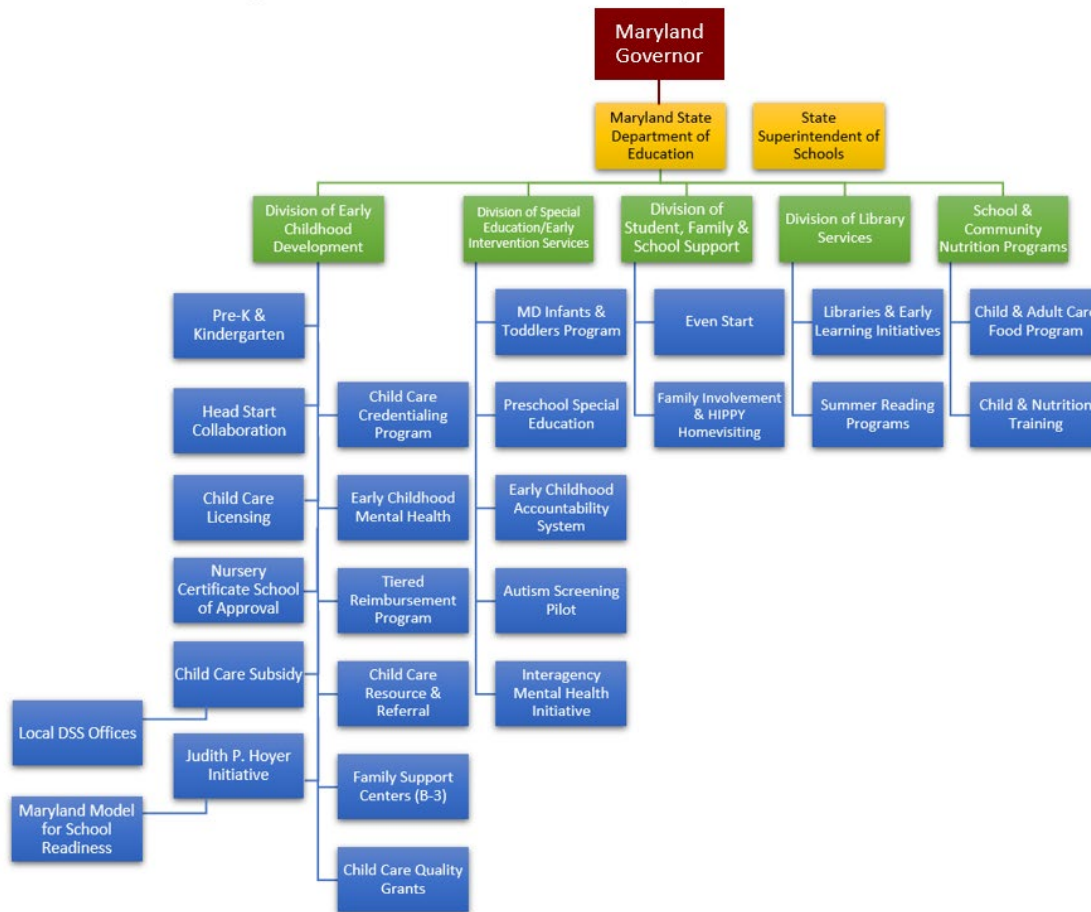


Source: Legislative Office of Fiscal Transparency’s creation based on Pennsylvania government reports.

## Consolidated Governance – Maryland

Figure 12: Maryland’s Governance of Early Care and Education. (This figure illustrates Maryland’s early childhood governance structure embedding all early childhood-centric programs and services under the Maryland State Department of Education.)

### Maryland’s Governance Early Care and Education Model.

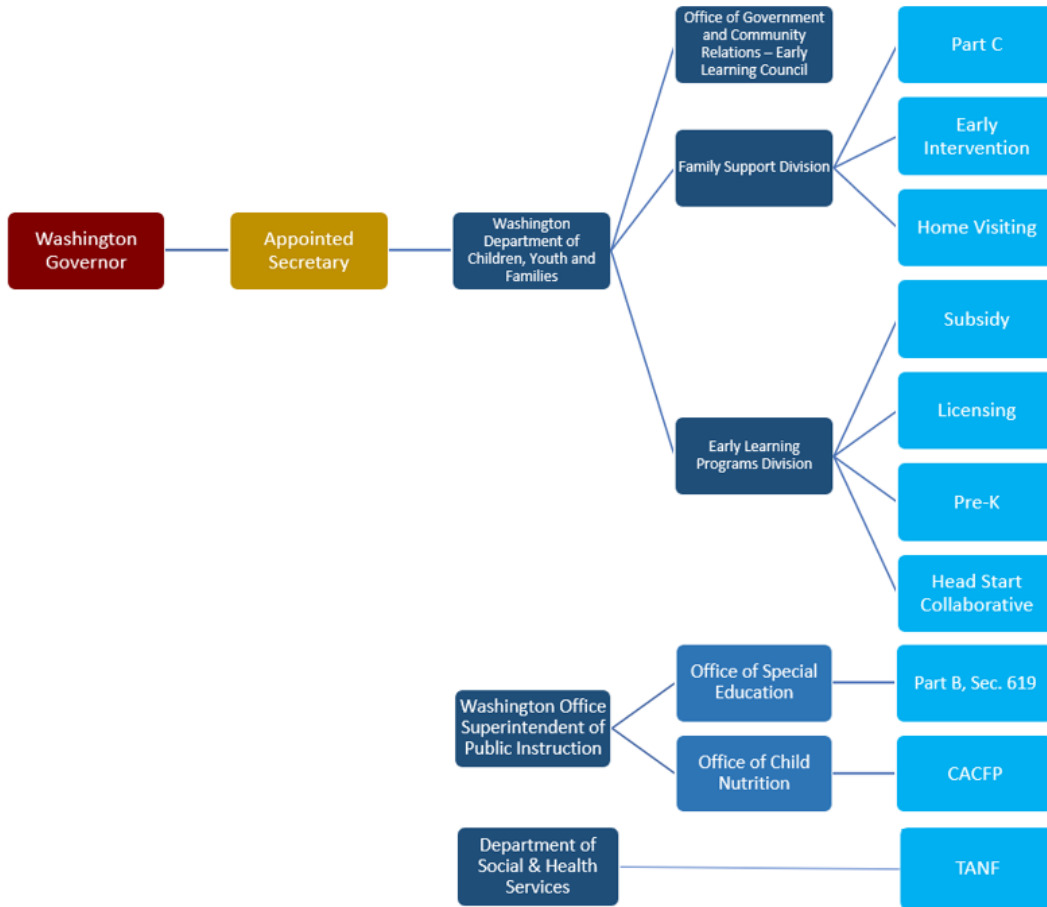


Source: Legislative Office of Fiscal Transparency’s creation based on Maryland government reports.

## Creation of Independent State Agency

Figure 13: Washington’s Governance Early Care and Education Model. (This figure illustrates Washington’s early childhood governance structure reporting solely to the Executive branch.)

### Washington’s Governance Early Care and Education Model.



Source: Legislative Office of Fiscal Transparency’s creation based on Washington government reports.

## Appendix J: SoonerStart Exhibit Included in OSDE Contract with OSDH

Figure 14: SoonerStart Exhibit Included in OSDE Contract with OSDH. (This figure illustrates the screenshot, provided by OSDE, of the contract between OSDE and OSDH for SoonerStart.)

Exhibit 1a

**SOONERSTART STATE FISCAL YEAR 2021: STATE JOINT FUNDING PLAN**  
FOR INTEGRATED INTERAGENCY ADMINISTRATIVE AND DIRECT SERVICES BUDGET

<b>SOONERSTART ENCUMBERANCES</b>			
<b>FUNDING SOURCE</b>	<b>STATE</b>	<b>FEDERAL</b>	<b>TOTAL</b>
<b>OSDE</b>			
Field Staff (Direct Services)	\$ 4,377,360.00	\$ 110,000.00	\$ 4,487,360.00
Admin & Planning Staff	\$ 397,422.00		\$ 397,422.00
Travel		\$ 360,000.00	\$ 360,000.00
Cell Phone / Computer	\$ 110,000.00		\$ 110,000.00
Assistive Technology		\$ 10,000.00	\$ 10,000.00
ICC Travel		\$ 1,000.00	\$ 1,000.00
Professional Dev. / Compliance		\$ 20,000.00	\$ 20,000.00
Admin & Overhead Cost		\$ 80,397.19	\$ 80,397.19
			<b>\$ 5,466,179.19</b>
<b>OSDH</b>			
Field Staff (Direct Services)	\$ 8,056,731.92	\$5,273,293.28	\$ 13,330,025.20
Contracted Staff (Direct Services)		\$1,498,540.00	\$ 1,498,540.00
Travel		\$844,080.00	\$ 844,080.00
Computer / Tulsa Move	\$100,000.00		\$ 100,000.00
Admin. & Planning Staff		\$317,200.53	\$ 317,200.53
Direct Support/Program Cost	\$2,656,409.92		\$ 2,656,409.92
			<b>\$ 18,746,255.65</b>
<b>TOTAL</b>	<b>\$ 15,697,923.84</b>	<b>\$ 8,514,511.00</b>	<b>\$ 24,212,434.84</b>
	\$ -	\$0.00	<b>\$7,933,113.81</b>

<b>SOONERSTART REVENUE</b>			
<b>FUNDING SOURCE</b>	<b>STATE</b>	<b>FEDERAL</b>	<b>TOTAL</b>
<b>IDEA Part C</b>		<b>\$5,923,248.00</b>	
<b>IDEA Part B</b>		<b>\$300,000.00</b>	
<b>SoonerStart State Line Item</b>	<b>\$14,400,341.00</b>		<b>\$20,623,589.00</b>
<b>Projected Medicaid</b>			
Early Intervention Services - OSDH		\$ 2,100,000.00	
Targeted Case Management - OSDE		\$ 191,263.00	
			<b>\$ 2,291,263.00</b>
EI Revolving Fund Carryover	\$ 1,297,582.84	\$ -	\$ 1,297,582.84
<b>TOTAL</b>	<b>\$ 15,697,923.84</b>	<b>\$8,514,511.00</b>	<b>\$24,212,434.84</b>

## **Appendix K: Early Childhood Education Programs, Authorization, Descriptions and Eligibility.**

### **Head Start and Early Head Start (EHS) - U.S. Code Citation: 42 USC 9801 et seq.**

The Oklahoma Head Start State Collaboration Office is located in the Oklahoma Association of Community Action Agencies and is overseen by the Oklahoma Department of Commerce.

Head Start is a Federal program that promotes the school readiness of children from birth to age five (B-5) from low-income families by enhancing their cognitive, social, and emotional development. Head Start programs provide a learning environment that supports children's growth in many areas such as language, literacy, and social and emotional development.

Children from birth to age five (B-5) from families with low income, according to the Poverty Guidelines published by the Federal government, are eligible for Head Start and Early Head Start services. Children in foster care, homeless children, and children from families receiving public assistance (Temporary Assistance for Needy Families or Supplemental Security Income) are also eligible for Head Start and Early Head Start services regardless of income.

### **IDEA Part B, Section 619, the Preschool Grants for Children with Disabilities**

This program provides formula grants to assist states to provide special education and related services to children with disabilities ages three through five years old, and at a state's discretion, to two-year-old children with disabilities who will turn three during the school year.

### **IDEA Part C, the Early Intervention Program for Infants and Toddlers with Disabilities**

This federal initiative provides formula grants to assist states to implement a comprehensive, coordinated, statewide system that provides early intervention services to children with disabilities or at risk for disability from birth through age two and their families. Services are to be delivered in the child's natural environment, such as a home or child care setting, to the maximum extent appropriate, based on the child's outcomes that are identified by the Individualized Family Service Plan team. IDEA requires that states have a child find system in place to ensure that all infants and toddlers with disabilities who are eligible for services are identified, located and evaluated.

### **Oklahoma Parents as Teachers (OPAT) – (70 O.S. § 10-105.3)**

The Oklahoma Parents as Teachers program (OPAT) was designed to support parents as their child's first and most important teachers by providing practical information and guidance to parents regarding the development of language, cognition, social skills, and motor development of children. The program is designed to maximize a child's overall development during the first three years of life by laying a foundation for school success and minimizing developmental problems that interfere with the child's learning.



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### **Rural Infant Stimulation Environment Program (RISE)**

The funds allocated for this program are for a school designed to serve and appropriately educate children from birth to five years of age born with developmental disabilities. The goal of the RISE school is to provide quality early learning opportunities for children to be successful in school.

### **SoonerStart - Okla. Stat. tit. 70, §§ 13-121–129**

The Oklahoma State Department of Education (OSDE) Special Education Services is the lead agency for administration of SoonerStart (Part C) of the Individuals with Disabilities Act (IDEA). OSDE contracts with the Oklahoma State Department of Health and directly employs regional staff to deliver statewide early intervention services to children with disabilities and developmental delays from birth to age 3. SoonerStart is designated in state statute as a collaborative model between Health, Education, Human Services, and the Oklahoma Commission on Children and Youth.

SoonerStart is for infants and toddlers through 36 months of age who have developmental delays or have a physical or mental condition (such as Down Syndrome, cerebral palsy, etc.) which will most likely cause a developmental delay.

### **Universal Prekindergarten - 70 OK Stat § 70-1-114, 70 OK Stat § 70-11-103.7**

Operated by the Oklahoma State Department of Education, Oklahoma is one of just nine states funding prekindergarten through a state aid formula with unrestricted eligibility and no cap on total funding. Public school districts receive funding for the Early Childhood Four-Year-Old Program through the state school finance formula. A per pupil rate, calculated using the age of the child and the length of the program day, is used to repay districts.

### **Early Childhood Initiative – §70-10-105.4**

The State Board of Education shall establish a pilot early childhood program to consist of private donations and state funds that will serve at-risk children in at least one urban area and one rural area of this state to be selected by the Board. The OECP provides the fiscal structure to align Oklahoma State Department of Education and private resources to promote high-quality standards tied to minimum teacher qualifications, ongoing professional development, and parent supports designed to foster low-income families' independence and economic success.

## Appendix L: Oklahoma Head Start Pre-K Collaboration (FY21)

Chart 16: Oklahoma Head Start Pre-K Collaboration (FY21). (This sunburst chart represents the collaboration between Head Start and Oklahoma schools.)



Source: Legislative Office of Fiscal Transparency's analysis and creation based on data from Head Start

## Appendix M: Federal Funding Formulas for Early Childhood Education Programs

Table 11. Federal Funding Formulas for Early Childhood Education Programs. (This table describes the federal funding formulas for specific early childhood education programs.)

Early Childhood Program	Federal Funding Formulas
Special Education - Preschool (IDEA Part B)	Funds are distributed to eligible entities through a formula based on general population and poverty. Under the formula, each State is first allocated an amount equal to its fiscal year 1997 allocation. For any year in which the appropriation is greater than the prior year level, 85 percent of the funds above the fiscal year 1997 level are distributed based on each State's relative percentage of the total number of children aged 3 through 5 in the general population. The other 15 percent is distributed based on the relative percentage of children aged 3 through 5 in each state who are living in poverty.
SoonerStart (IDEA Part C)	Allocations are based on the number of children in the general population aged birth through 2 years in each state. The Department of Education uses data provided by the United States Census Bureau in making this
Head Start	From the total amount of appropriated funding, all Head Start programs in the states and territories, as well as all American Indian and Alaskan Native (AIAN) and Migrant and Seasonal Head Start (MSHS) programs, are allotted their same <b>base grant</b> amount and, where appropriate, collaboration grant amount as in the prior year. The "base grant" does not include amounts received for "training and technical assistance."

Source: Legislative Office of Fiscal Transparency's creation based on data from U.S. Department of Education and Health and Human Services.

## Appendix N: Calculation of State Aid – Special Education

Oklahoma has a primarily student-based funding formula. The Oklahoma State Aid funding formula assigns a cost to the education of a student with no special needs or services, called a base amount. It then accounts for the additional cost of educating specific categories of students mainly by applying multipliers to that amount to generate supplemental funding for those students; these are known as “weights.” The State Aid funding formula has specific state category weights in which local school districts receive additional funding for students with specific needs (i.e., gifted and talented, special education, etc.). Specified weights are applied to students with specific disabilities to assist school districts in ensuring these students receive the same level of education as non-disabled students.

The Oklahoma State Department of Education (OSDE) utilizes a special education weight spreadsheet to assist local school districts in identifying and calculating the number of students receiving special education services. As seen in the table below, each area of special education has been categorized with a specific weight, the total weighted amount is then applied to the district’s weighted Average Daily Membership (ADM). In the 2020-21 academic school year, the total weighted amount for special education totaled 128.483.75.<sup>63</sup>

### IDEA PART B, 619 Allocations to Districts

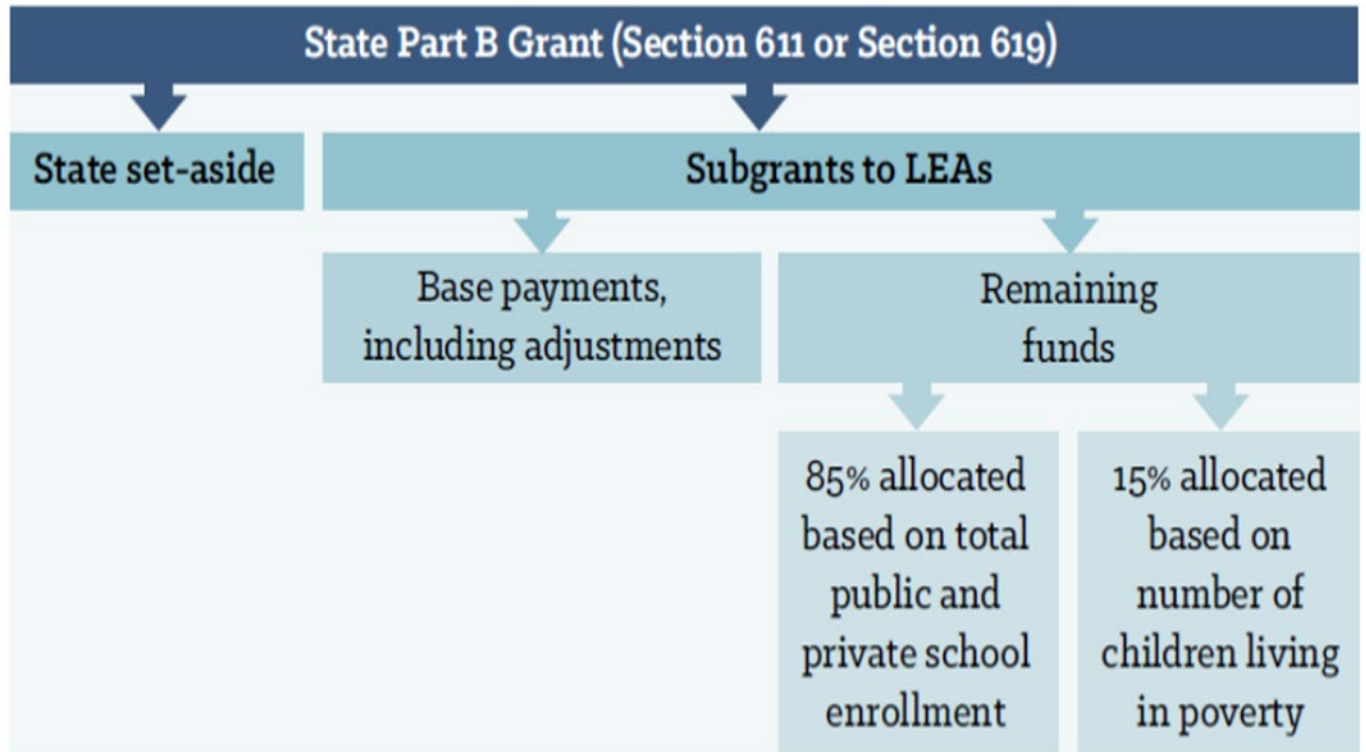
Funds are the OSDE United	Special Education Child Count	# of students	Factor	Weighted Amount	awarded to by the States
	Hearing Impairment, including Deafness	0	2.90	0.00	
	Deaf	0	2.90	0.00	
	Speech or Language Impairment	0	0.05	0.00	
	Visual Impairment, including Blindness	0	3.80	0.00	
	Emotional Disturbance	0	2.50	0.00	
	Orthopedic Impairments	0	1.20	0.00	
	Other Health Impairments	0	1.20	0.00	
	Specific Learning Disability	0	0.40	0.00	
	Deaf-Blindness	0	3.80	0.00	
	Multiple Disabilities	0	2.40	0.00	
	Autism	0	2.40	0.00	
	Traumatic Brain Injury	0	2.40	0.00	
	Developmental Delays				
	Intellectual Disabilities	0	1.30	0.00	
	Summer Program-ESY with Primary MD	0	1.20	0.00	
	Total	0		0.00	

Department of Education (USDE), Office of Special Education Programs (OSEP), to “flow-through” to local school districts contingent upon a school’s application for Part B funds.

IDEA Part B, 619 funds are earmarked for children with disabilities aged three through five, and are awarded on a formula based on:


<sup>63</sup> [District Detail Weights | Oklahoma State Department of Education](#)

- The number of children with disabilities aged three, four, and five served on October 1, 2020;
- The total enrollment in the LEA (in both public and private schools located in the LEA); and
- The poverty level of the LEA (defined as the free and reduced lunch count within the LEA)



## Appendix O: States Linking Child-Level Data Across ECE Programs.

Figure 15: States Linking Child-Level Data Across ECE Programs. (This figure illustrates the states that are linking specific early childhood programs to one another.)



### Appendix B. Status Linking Child Data Across ECE Programs by State

State	Has an early childhood integrated data system	Early intervention (IDEA Part C)	Preschool special education (IDEA Part B, 619)	State-funded prekindergarten	State-funded Head Start	Federally funded Head Start	Subsidized child care	Home visiting
1. Colorado	No	Yes	Yes	Yes	.	Yes	Yes	No
2. Connecticut	Yes	No	No	Yes	No	No	Yes	Yes
3. Georgia	Yes	Yes	Yes	Yes	.	Yes	Yes	Yes
4. Illinois	Yes	Yes	Yes	Yes	.	No	Yes	Yes
5. Kansas	No	No	Yes	Yes	.	No	No	Yes
6. Louisiana	Yes	No	No	No	No	No	Yes	No
7. Maryland	Yes	No	No	No	.	No	Yes	No
8. Massachusetts	Yes	No	No	No	.	No	Yes	No
9. Michigan	Yes	Yes	Yes	Yes	.	Yes	Yes	No
10. Minnesota	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
11. Mississippi	Yes	Yes	Yes	Yes	.	Yes	Yes	Yes
12. Nebraska	No	Yes	Yes	Yes	.	No	No	No
13. New Jersey	Yes	No	Yes	Yes	Yes	No	No	No
14. New Mexico	Yes	Yes	Yes	Yes	.	No	Yes	Yes
15. North Carolina	Yes	Yes	Yes	Yes	.	No	Yes	No
16. Ohio	Yes	Yes	Yes	Yes	.	No	Yes	Yes
17. Oklahoma	No	Yes	Yes	No	.	No	No	No
18. Pennsylvania	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
19. Rhode Island	Yes	Yes	Yes	Yes	No	No	No	Yes
20. Utah	Yes	No	No	No	.	Yes	Yes	Yes
21. Washington	Yes	Yes	Yes	Yes	.	No	Yes	No
22. Wisconsin	Yes	Yes	No	.	.	No	Yes	Yes

ecedata.org
36

Source: 2018 State of State Early Childhood Data Systems Report.

## Appendix P: North Carolina’s ECIDS Report Example.

Figure 16: North Carolina’s ECIDS Report Example. (This figure illustrates a screenshot of North Carolina’s comprehensive data system to report vital statistics and metrics related to children enrolled and receiving early childhood services.)



July 1, 2014 - June 30, 2015  
North Carolina  
Ages 0-5 Years<sup>1</sup>

### Number of Children Receiving Two NC ECIDS Services

NC ECIDS Services	Total Children Enrolled	Number of Children also enrolled in...											
		Child Protective Services		Exceptional Children (IDEA Part B)		Food and Nutrition Services		Infant Toddler (IDEA Part C)		NC Pre-K		Subsidized Child Care Assistance	
Child Protective Services	31,708			125	0.4%	12,783	40.3%	267	0.8%	231	0.7%	1,421	4.5%
Exceptional Children (IDEA Part B)	18,775	125	0.7%			3,599	19.2%	1,243	6.6%	1,174	6.3%	488	2.6%
FNS	278,249	12,783	4.6%	3,599	1.3%			5,091	1.8%	10,112	3.6%	37,806	13.6%
Infant Toddler (IDEA Part C)	19,070	267	1.4%	1,243	6.5%	5,091	26.7%			NA <sup>2</sup>	NA <sup>2</sup>	612	3.2%
NC Pre-K	28,832	231	0.8%	1,174	4.1%	10,112	35.1%	NA <sup>2</sup>	NA <sup>2</sup>			1,149	4.0%
Subsidized Child Care Assistance	73,060	1,421	1.9%	488	0.7%	37,806	51.7%	612	0.8%	1,149	1.6%		

This table shows the number of children receiving combinations of two programs during the State Fiscal Year. For example, 231 (or 0.7%) of the 31,708 children in the Child Protective Services program were also in the NC Pre-K program during the 2014-2015 State Fiscal Year.

<sup>1</sup>Ages 0-5 Years includes children from birth to six years old minus one day.

<sup>2</sup>NA = Not Applicable. Because the age eligibility for Infant/Toddler (0-3) does not overlap with NC Pre-K (age 4 by August 31), it is not possible to have a child in both programs at the same time.

**Notes**

- Each agency and program participating in NC ECIDS maintains its own data, and each one has protocols for data entry and data quality. NC ECIDS does not conduct any additional data quality measures. All programs ensure the highest quality data to the extent possible.
- When there is a count of children fewer than 10 in any cell, that number will not be shown. Those cells will display as VTSTS (Values Too Small To Show). When there are no children that meet the specific criteria within a cell (N=0), the cell will display as 0.0%.
- All numbers may not add up to 100% due to rounding. It is also possible that some rows and/or columns may not be based on a total of 100%, so the user should read each table carefully.

**NC ECIDS Programs in the Report**

- Child Protective Services (CPS)
- Exceptional Children (IDEA Part B)
- Food and Nutrition Services (FNS); also called Supplemental Nutrition Assistance Program (SNAP)
- Infant/Toddler Program (ITP); also called IDEA Part C
- NC Pre-kindergarten Program (NC Pre-K)<sup>\*</sup>
- Subsidized Child Care Assistance (SCCA)<sup>\*\*</sup>

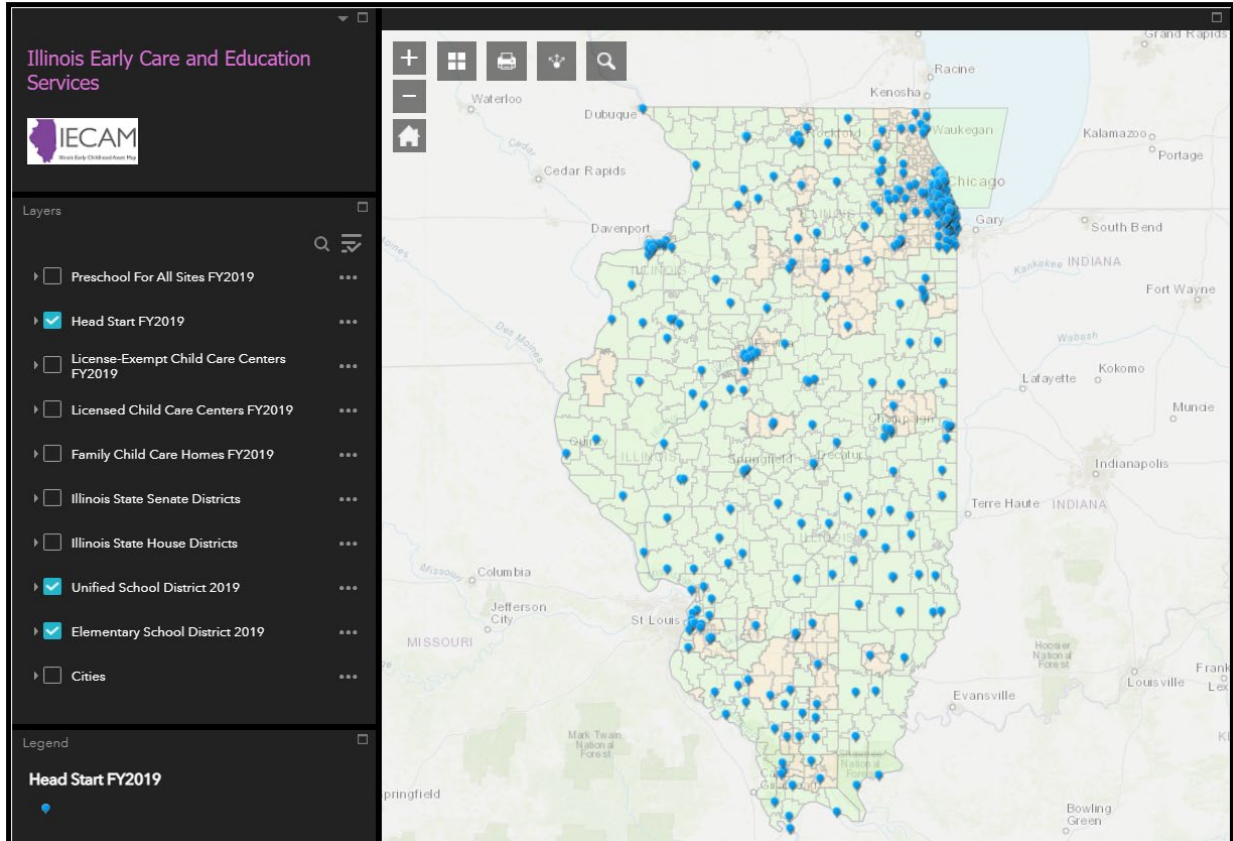
<sup>\*</sup>Title I Pre-K is not included within NC ECIDS services. There may be children participating in NC Pre-K who receive Title I assistance or are in a classroom receiving Title I assistance, but that is not captured here.

<sup>\*\*</sup>Subsidized Child Care Assistance does not include subsidies provided by Smart Start.

For more information on each of the programs click on [NC ECIDS](#)

## Appendix Q: Illinois Early Childhood Asset Map

Figure 17: Illinois Early Childhood Asset Map. (This figure illustrates a screenshot of Illinois Early Care and Education Services' asset map locating early childhood programs across the state.)

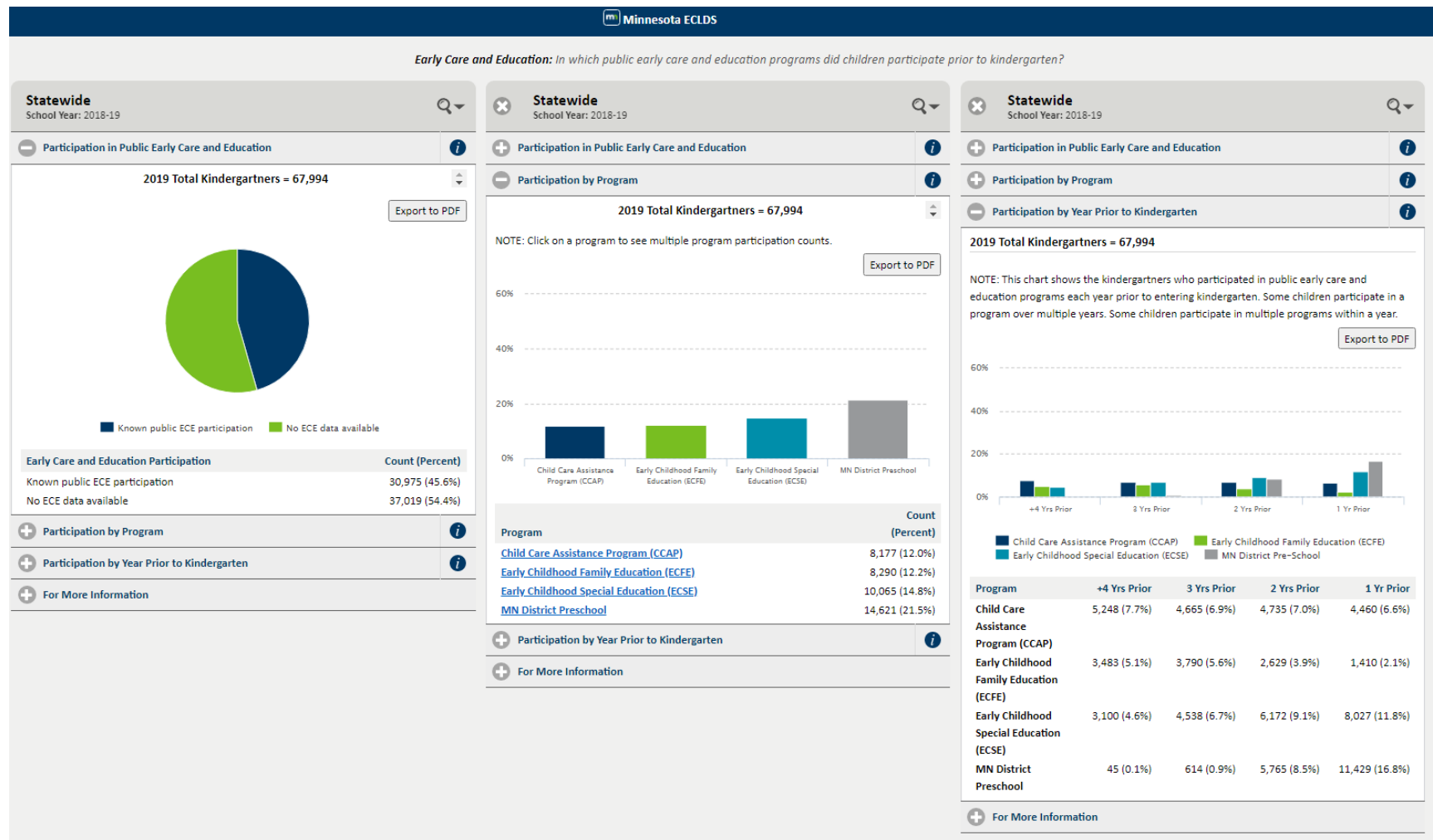


Source: [IECAM | Illinois Early Childhood Asset Map](#)



## Appendix R: Minnesota ECLDS Early Care and Education Report 2018-2019.

Figure 18: Minnesota ECLDS Early Care and Education Report 2018-2019. (This figure illustrates a screenshot from Minnesota’s ECIDS showing statewide utilization of early childhood programs.)



## Appendix S: Preliminary Five-year Cost Estimate for Oklahoma ECIDS.

Figure 19: Preliminary Five-Year Cost Estimate for Oklahoma ECIDS. (This figure illustrates a cost projection analysis for an ECIDS.)

3Si generated estimates of the five-year implementation costs of an ECIDS with the understanding that the budget is preliminary and OPSR will continually adjust and refine its specifics. Within this context, the section below highlights several key points.

Figures 6-3 and 6-4 below respectively summarize the high- and low-cost estimated annual costs by expense category. See Appendix P (Preliminary Five-Year Cost Estimate for Oklahoma ECIDS) for details on Center and other ECIDS expenses. These estimates draw on a large body of data and research. We forecast that the ECIDS will cost between \$2.9-3.9M in Year One, \$4-5.2M in Year Two, \$4.1-5.3M in Year Three, \$3.1-4.2M in Year Four, and \$3.1-4.1M in Year Five onward.<sup>64</sup>

Figure 6-3 - ECIDS implementation cost projection (High estimate)

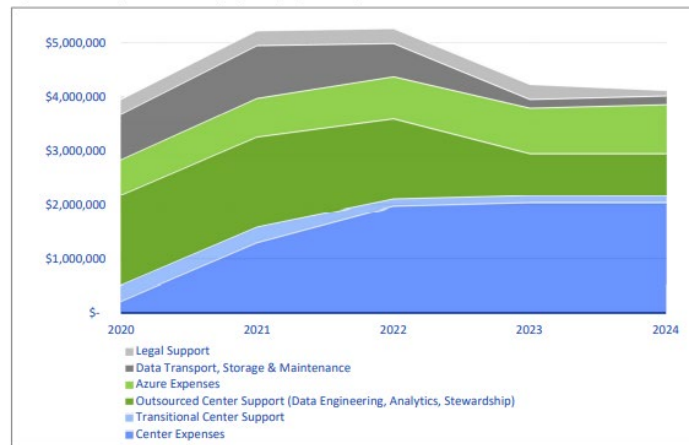
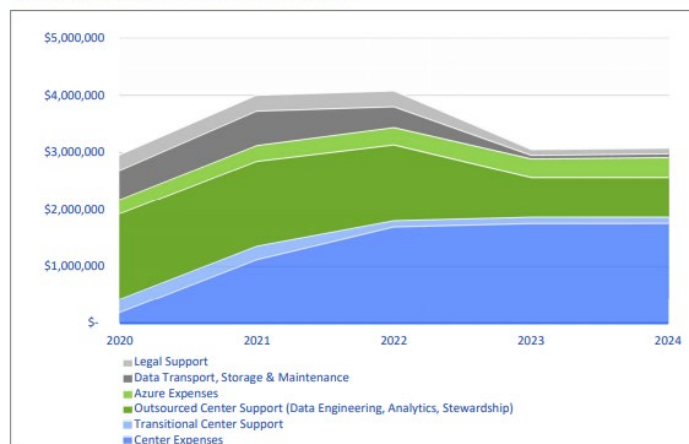


Figure 6-4 - ECIDS implementation cost projection (Low estimate)



Source: The Oklahoma Partnership for School Readiness

<sup>64</sup> [A Plan for an Early Childhood Integrated Data System in Oklahoma](#)

## Appendix T: Early Childhood Commonly Used Abbreviations

<b>Abbreviation</b>	<b>Full Name</b>
ACF	Administration for Children and Families
CCDBG	Child Care and Development Block Grant
CCDF	Child Care and Development Fund
ECAC	Early Childhood Advisory Council (also SECAC – State Early Childhood Advisory Council)
ECCS	Early Childhood Comprehensive Systems
ECE	Early Childhood Education or Early Care and Education
EHS	Early Head Start
EIS	Early Intervention Services
HS	Head Start
IECMH	Infant and Early Childhood Mental Health
IDEA	Individuals with Disabilities Education Act
IEP	Individualized Education Program
IFSP	Individualized Family Service Plan
LEA/SEA	Local Education Agency/State Education Agency
MIECHV	Maternal, Infant and Early Childhood Home Visiting
OSEP	Office of Special Education Programs
PD	Professional Development
PDG B-5	Preschool Development Grant Birth through Five
QRIS	Quality Rating and Improvement System
RTT	Race to the Top
SLDS	Statewide Longitudinal Data Systems
SNAP	Supplemental Nutrition Assistance Program
TANF	Temporary Assistance for Needy Families

## Appendix U: Identified Early Childhood Programs (19)

Table 12. Identified Early Childhood Programs. (This table lists the early childhood programs identified by LOFT via the data provided by OPSR and research of State agencies' programs and services.)

Program	Domain	Operating Agency	Program Description
Women, Infants and Children (WIC)	Basic Needs & Family Assistance	OSDH	The Women, Infants, and Children federal grant funds supplemental food, health care referrals, and nutrition education for low-income mothers and children up to age five who are found to be at nutritional risk. The program is funded by the federal government and private sources (Nestle Infant Formula Rebates ) and is operated through the State Health Department and tribal governments
Temporary Assistance for Needy Families (TANF)	Basic Needs & Family Assistance	OKDHS	TANF (Temporary Assistance for Needy Families) provides time-limited cash assistance to low-income families with minor children who are deprived of parental support because of the absence, death, incapacity, or unemployment of at least one parent. More than half of Oklahoma TANF cases are "child-only cases" in which no adult household member receives assistance. Since 1996, TANF is operated as a federal block grant with a state matching requirement. Less than 25 percent of TANF funds are spent on cash assistance; most is spent on child care and work support programs.
Supplemental Nutrition Assistance Program (SNAP)	Basic Needs & Family Assistance	OKDHS	The Supplemental Nutrition Assistance Program (formerly Food Stamps) provides a monthly benefit for eligible low-income households to purchase groceries. The federal government pays the full cost of SNAP benefits and splits the cost of administering the program with states.
Childcare Subsidies	Child Care & Safety	OKDHS	The Child Care Subsidy Program assists qualifying families by paying all or part of their child care costs in a licensed home or center. To be eligible, families must meet income requirements and the adults in the home must be engaged in qualifying activities such as work or school. The Child Care Subsidy Program is funded through a variety of federal block grants, some of which require state matching funds.
Child Abuse Prevention	Child Care & Safety	OSDH	The Office of Child Abuse Prevention's (OCAP) mission is to promote health and safety to children and families by reducing child abuse and neglect through the funding of direct services; the training of professionals that work in the child abuse prevention and protection arenas; and conducting activities that educate the public about child maltreatment and enhance the infrastructure that supports prevention efforts.
Children First	Child Care & Safety	OSDH	The Children First program is a voluntary program for first-time moms. A specially trained registered public health nurse will makes home visits throughout the pregnancy and up until the baby is 2 years old- at no charge. At the home visit the registered nurse will provide education on pregnancy, labor and delivery, and parenting skills such as feeding, bathing, and toilet training.
Child Guidance	Child Care & Safety	OSDH	Child Guidance staff provides fee-based services that fall into four general categories: services to individual children and families, education services to the general population, services to professionals, and community development. The Child Guidance Program has three professional components designed to interface to provide a continuum of services to build healthy family relationships and enhance child development. These include Behavioral Health Services, Childhood Development and Parent Education Services, and Speech Language Services.
SoonerCare (0-5 only)	Child Health	OHCA	SoonerCare, Oklahoma's Medicaid program, provides comprehensive health care coverage to eligible low-income populations. Children in Oklahoma are eligible for SoonerCare up to 185 percent of the federal poverty level. The program serves approximately 2/3rds of all Oklahoma children ages 0-5.
SoonerCare (Pregnancy Services)	Child Health	OHCA	SoonerCare, Oklahoma's Medicaid program, provides comprehensive health care coverage to eligible low-income populations. Children in Oklahoma are eligible for SoonerCare up to 185 percent of the federal poverty level. The program serves approximately 2/3rds of all Oklahoma children ages 0-5.

Dental Health Service	Child Health	OSDH	To provide leadership in oral disease prevention, anticipate needs, and mobilize efforts that will help protect and promote good oral health for Oklahoma citizens.
Immunizations	Child Health	OSDH	As a major unit of the Oklahoma State Department of Health's Prevention and Preparedness Services the Immunization Service works to stop diseases before they start by promoting vaccination of all Oklahomans by providing vaccines through county health departments, operating the Vaccines for Children Program, operating and maintaining the State Immunization Information System, providing immunization information to the public and healthcare professionals, and supporting schools and childcare facilities in enforcement of immunization laws.
Maternal, Infant, and Early Childhood Home Visiting (MIECHV)	Child Health	OSDH	The Maternal, Infant, and Early Childhood Home Visiting Program gives pregnant women and families, particularly those considered at-risk, necessary resources and skills to raise children who are physically, socially, and emotionally healthy and ready to learn by providing voluntary, evidence-based home visiting services.
Newborn Screening	Child Health	OSDH	Every baby born in Oklahoma is required to have a blood test in the first week of life. The birthing hospital or midwife collects the newborn screening specimen and submits the specimen to the Public Health Laboratory for testing. This program provides: short-term, follow-up case management services are provided through the Newborn Screening Program offering support and guidance to healthcare providers and families regarding follow-up recommendations for all children who have an out of range newborn screen result; short-term, follow-up case management continues until either the child is diagnosed with a condition or determined to not be affected by the condition; and if a child is diagnosed they are transitioned to long-term, follow-up care and continue being monitored and evaluated through the specialty clinic.
Newborn Hearing Screening	Child Health	OSDH	All newborns have hearing checked before they leave the hospital. The program also provides information for infants who pass the newborn hearing screen but have a risk factor for possible late onset hearing loss. If a baby does not pass hearing screening at birth, the Newborn Hearing Program sends the results and follow-up recommendations to the infant's doctor and parents. Information about where hearing can be checked is provided to the family. The program also provides recommendations for infants who pass the newborn hearing screen but have a risk factor to develop late onset hearing loss. The program provides hearing equipment and oversight for many health departments to screen for the hearing of infants and toddlers. Program staff assists with ensuring that infants with hearing loss receive early intervention services in a timely manner.
Childhood Lead Poisoning	Child Health	OSDH	The Oklahoma Childhood Lead Poisoning Prevention Program (OCLPPP) strives for the elimination of childhood lead poisoning as a public health problem in Oklahoma. The OCLPPP provides guidance regarding screening and testing for lead exposure for children 6-72 months of age. The program also provides follow-up services for children with blood lead levels that are 5 µg/dL or greater and can provide general lead information for any ages.

SoonerStart (IDEA Part C)	Early Education	OSDE	Oklahoma's early intervention program is designed to meet the needs of infants and toddlers with disabilities and developmental delays. Services may include diagnostic and evaluation, case management, family training, counseling and home visits, certain health services, nursing and nutrition services, occupational, physical and speech-language therapy, and special instruction (IDEA PART C).
Head Start	Early Education	Commerce	Head Start provide comprehensive child development services to economically disadvantaged children and families, with a special focus on helping preschoolers develop the early reading and math skills they need to be successful in school. In Oklahoma, Head Start programs are administered by Community Action agencies, private nonprofit agencies, American Indian Tribes, and a school district. The programs are funded primarily with federal grants , along with state funds through the Oklahoma Department of Commerce.
Early Childhood Special Education (IDEA Part B)	Early Education	OSDE	Funded through the USDOE Office of Special Education Programs (OSEP), which is dedicated to improving results for infants, toddlers, children and youth with disabilities ages birth through 21 by providing leadership and financial support to assist states and local districts. Through this office, the Individuals with Disabilities Education Act of 2004 (IDEA) authorizes formula grants to states for Early Childhood Special Education programs to support research, demonstrations, technology and personnel development and parent-training and information centers (IDEA Part B).
Pre-Kindergarten	Early Education	OSDE	The program is supported with a combination of federal, state, and local funds and administered by local school districts and the OSDE.
Early Childhood Initiative	Early Education	OSDE	The Early Childhood Initiative is a cooperative effort between public entities and private donors combining best practices in early childhood education and collaborative partnerships to enhance the early learning curriculum with wrap-around family engagement services such as parental education classes, health promotions, crisis intervention and counseling, medical care, and asset building programs.

Source: Oklahoma Partnership for School Readiness and Oklahoma Policy Institute

## Appendix V: Oklahoma At-Risk Reading Sufficiency Rates

Table 13: Oklahoma At-Risk Reading Sufficiency Rates (2013-2019). (This table illustrates the at-risk reading sufficiency rates for Oklahoma Kindergarten through third grade students, measured at both the beginning of the year (BoY) and end of the year (EoY).

	2013		2014		2015		2016		2017		2018		2019		2020		8-Year Averages per Grade	
	BoY	EoY	BoY	EoY	BoY	EoY	BoY	EoY	BoY	EoY	BoY	EoY	BoY	EoY	BoY	EoY	BoY	EoY
Kindergarten	34%	21%	37%	23%	34%	21%	36%	23%	35%	21%	33%	22%	34%	21%	41%	*	36%	22%
1st	33%	24%	40%	29%	40%	27%	40%	27%	38%	26%	39%	32%	41%	27%	47%	*	40%	27%
2nd	35%	26%	43%	31%	41%	30%	40%	27%	40%	24%	41%	27%	43%	28%	45%	*	41%	28%
3rd	35%	25%	42%	30%	42%	29%	40%	26%	39%	24%	39%	24%	40%	25%	43%	*	40%	26%

Source: Legislative Office of Fiscal Transparency's analysis based on data from OSDE's Annual Reading Sufficiency Reports.

\*No data available due to pandemic, EoY averages represent 7-year average from 2013-2019 due to data limitations from 2020.

Data from the Oklahoma State Department of Education's (OSDE) annual reading sufficiency reports illustrates that at-risk reading sufficiency rates (RSA), whether measured by the beginning of the year (BoY) or end of the year (EoY) are increasing over time for students as they progress through Oklahoma's education system. Data further indicates school-year gains are not maintained from EoY to BoY of subsequent school year.

As indicated in the far, right column, the 8-year average BoY at-risk RSA for kindergarteners is 36 percent but increase to 40 percent for 1<sup>st</sup> and 3<sup>rd</sup> graders. 2020 is also the first year in which all grades, kindergarten through third grade had at-risk RSA over 40 percent.

Due to the COVID-19 pandemic, 2020 end-of-year assessments for RSA were not conducted.

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## Agency Response

- LOFT's response to OSDE response, August 16, 2021
- OSDE Response, August 13, 2021<sup>65</sup>

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<sup>65</sup> LOFT received agency response on August 13,2021, however when received the agency response was dated August 18,2021.



August 16, 2021



**LOFT**  
LEGISLATIVE OFFICE OF  
FISCAL TRANSPARENCY

## **LOFT's comments on the response from the State Department of Education**

As part of LOFT's protocol, agencies are granted the opportunity to respond to the evaluation report and findings. For this priority program evaluation, LOFT examined the role of the State Department of Education (OSDE) as the Lead Agency in the State's system of early childhood programs and services.

Portions of OSDE's response warrant further clarification and correction, which will be addressed. With this response, LOFT seeks to address questions of fact, and not differences of opinion.

### **Scope of Project**

Priority program evaluations provide a detailed, multi-faceted review of State programs. Over the course of several months, LOFT performed extensive research on early childhood programs, evaluated sources of funding, met with stakeholders engaged in either the delivery or coordination of programs and services, examined state and federal statutes, and conducted comparative research on other state initiatives pertaining to effective delivery of early childhood services.

The scope of this evaluation sought to identify all publicly funded early childhood programs, including their funding sources, how they are delivered, and to whom. Additional objectives for this evaluation included establishing the level of coordination that exists among the various programs and any potential opportunities to better leverage funds and resources, as well as determining how program outcomes are measured and whether there are sustained benefits from the programs.

OSDE's response reflects disagreement with LOFT's analysis and conclusions regarding how the agency measures program effectiveness. While OSDE provides some examples of specific programs with pre- and post-measurements, LOFT did not observe the use of outcome-based measures for the majority of programs, and particularly for Universal Pre-K, the State's largest early childhood education program.

It should be noted that this evaluation did not seek to measure outcomes but rather determine if and how program outcomes are measured and whether benefits can be quantified. Absent outcome-based data, LOFT examined outcome indicators identified by OSDE, primarily the Reading Sufficiency Rate of students.

### **Clarification of Agency's Response:**

OSDE claims LOFT's evaluation "includes no mention of whether or not changing governance structures positively impacts the delivery of early childhood services...." LOFT highlights the observed benefits of other states' governance systems on page 22 of the report.

### **LOFT's response to claims of inaccuracy within report:**

***In response to Finding 3: "Oklahoma's Fragmented Funding Approach to Early Childhood Limits Accountability and Effectiveness,"*** OSDE challenges the basis of fact for the statement that Oklahoma funded Pre-K "beyond the minimum cost to provide full-day and high-quality Pre-K." The statement is taken directly from descriptions provided within the table on page 25 of the 2020 Report from the



August 16, 2021

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National Institute for Early Education Research (NIEER), the citation for which is provided in the report's footnotes.

OSDE also contends that Oklahoma is 25<sup>th</sup> among all states for **state** funding for Pre-K, while LOFT reported NIEER's ranking of Oklahoma among states based on **all sources of funding**. OSDE also suggests that NIEER's reporting of state spending may be unreliable as it is based on states' self-reported data and due to OSDE identifying an error in NIEER's description of Oklahoma's Pre-K program. LOFT does not dispute errors may exist, but maintains that NIEER is considered a reputable source for national data and the Institute's state rankings are often cited by OSDE.

***In response to Finding 4: "Lack of Data Limits the State's Ability to Assess Investments and Outcomes into Early Childhood Education,"*** OSDE incorrectly claims that LOFT did not seek information about program outcomes. OSDE is correct in noting that LOFT made clear that it would not be evaluating program outcomes; rather, LOFT inquired as to whether outcome data existed. OSDE cites examples of program goals and statutory compliance, but those metrics are not related to outcomes. Specific to outcome measurements for the State's Pre-K program, LOFT was directed by OSDE to the Reading Sufficiency Rates as a performance indicator.

Regarding OSDE's challenge of the factual accuracy regarding special education metrics being "centered more on renewal and compliance" than long-term outcomes, LOFT was referring only to **federal** reporting metrics, which are focused on fund renewal and compliance. The 10 years of state-level indicator data specific to IDEA Part C, referenced by OSDE, was reviewed by LOFT and determined to be focused on access to services as opposed to Oklahoma-specific outcomes.

OSDE refutes LOFT's assessment that the State's early childhood programs' "primary focus is on collecting data on student and family demographics and the number of families served." LOFT maintains this assessment, which was informed by survey results from programs across state government and not exclusive to OSDE. Further, OSDE provided information regarding the type of data collected under IDEA. LOFT found these data collection fields to substantiate the claim that data is not outcome focused, as the data captures programs' child counts, discipline counts, dispute resolution and other non-performance related inputs.

OSDE asserts that LOFT's use of data in Chart 14 is selective. In order to demonstrate longitudinal performance, LOFT selected a specific cohort of students to track from 2014 through 2018. The data referenced by OSDE represents the total Reading Sufficiency Rate for an entire age range, year over year, and is not longitudinal.

LOFT also presents the data OSDE references (entire student population and not a selected cohort) in Chart 13 of the report. The chart provided by OSDE in their response presents data reflecting performance measured from the beginning of the school year to the end of the school year, reflecting school-year gains that are not maintained over calendar year.



JOY HOFMEISTER

STATE SUPERINTENDENT *of* PUBLIC INSTRUCTION  
OKLAHOMA STATE DEPARTMENT *of* EDUCATION

**TO:** Legislative Office of Fiscal Transparency (LOFT)

**FROM:** Superintendent Joy Hofmeister

**DATE:** August 18, 2021

**SUBJECT:** Agency Response to the Priority Evaluation of Early Childhood Education

The Oklahoma State Department of Education (OSDE) would like to thank LOFT for its tremendous work in the review of Early Childhood programs in the state. The OSDE found the LOFT staff to be professional in their communication and responsive to feedback and concerns. The evaluation will be an important resource for years to come. In particular, it highlights the complexity of the state's system of early childhood, with educational programs being only a small part – only 5% of federal funding for early childhood services comes from the U.S. Department of Education and 31% of total funding for early childhood is spent on educational programs. This evidences the need for collaboration among state agencies and other advisory entities to ensure families are able to easily navigate services for their children. OSDE is committed to this task.

While the bulk of the LOFT evaluation is factual, and OSDE substantially agrees with the information presented, there are a few areas in particular where additional context and clarification is necessary. First, the LOFT evaluation highlights the work of two advisory committees – the Interagency Coordinating Council (ICC) and the Oklahoma Partnership for School Readiness (OPSR) – and asserts that neither is being used to its full potential. The OSDE maintains that it has and will continue to utilize these advisory entities within the scope of state and federal law.

Second, the LOFT evaluation implies that the third-grade English Language Arts (ELA) assessment and screening assessments used as part of the Reading Sufficiency Act (RSA) should be viewed as measures of performance for early childhood education programs. While these are important tools, neither was designed to be used for this purpose, and there are many other factors that impact both the third-grade ELA scores and the effectiveness of early childhood education. OSDE recognizes the need for a tool that educators can use to quickly understand the knowledge and skills of students as they enter kindergarten and first grade. As such, the OSDE has developed and just launched its Early Learning Inventory (ELI) to quickly assess student learning and development, inform instruction and create valuable opportunities to communicate with families and drive policy.<sup>1</sup> The OSDE also strongly supports the creation of an early childhood integrated data system (ECIDS), as highlighted in the evaluation, to provide a more holistic picture of early childhood services and outcomes in the state.

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<sup>1</sup> More information on this initiative is available at [readytogether.sde.ok.gov](https://readytogether.sde.ok.gov).



JOY HOFMEISTER

STATE SUPERINTENDENT *of* PUBLIC INSTRUCTION  
OKLAHOMA STATE DEPARTMENT *of* EDUCATION

The LOFT evaluation includes several agency recommendations for additional research, study and evaluation. In particular, six of the recommendations suggest the OSDE should collect additional data for and undertake additional study of early childhood education programs. While these are certainly worthy pursuits, each of these recommendations will require significant investment, time and resources to conduct. Unfortunately, there are very few of the agency recommendations that OSDE can pursue without additional funding.

In conclusion, OSDE cautions against rushing to change the governance structure of early childhood based on recent moves by other states, as highlighted in the evaluation. While centralizing services may sound appealing, many states that have recently undertaken this task are already facing significant challenges in navigating the complex funding streams and federal regulations that support early childhood services, including those to children with disabilities. *See*, for example, 20 U.S.C. § 1412(a)(11)(C). Additionally, the evaluation includes no mention of whether or not changing governance structures positively impacts the delivery of early childhood services and such a study should be undertaken before a significant change in governance is pursued. It is imperative that the educational services for the more than 40,000 children in early childhood education programs under IDEA Parts B and C and pre-kindergarten stay under one entity as they are integral to support the work of the 541 school districts of the state. However, OSDE is open to the discussion of housing the services of Head Start in order to better support districts in accessing these funds.

One thing is indisputable, effective early childhood programs are critical to a solid foundation for children preparing to enter the k-12 system and positively impact the state's economy for years to come.<sup>2</sup> The OSDE looks forward to working with the Legislature and other partners to continue providing high-quality services and programs for the birth through age five population.

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<sup>2</sup> Gormley, William T., Jr., Phillips, D., & Anderson, S. (2018). The Effects of Tulsa's Pre-K Program on Middle School Student Performance. *Journal of Policy Analysis and Management*, 37(1), 63–87.

Bartik, T. J., Gormley, W., & Adelstein, S. (2012). Earnings Benefits of Tulsa's Pre-K Program for Different Income Groups. *Economics of Education Review*, 31(6), 1143–1161.



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***Finding 1: Early Childhood is Not an Education-Driven System.***

**Does the agency agree with the facts as presented?**

OSDE substantially agrees with the facts as presented.

**Does the agency agree with the recommendations related to this finding?**

OSDE has no comments on the policy considerations for Finding 1. There are no agency recommendations for Finding 1.

***Finding 2: Oklahoma Has Opportunities to Streamline Early Childhood Investments and Improve Efficiencies Through a Unified State Strategy.***

**Does the agency agree with the facts as presented?**

OSDE partially agrees with the facts as presented, and provides the following additional information for consideration.

- OSDE contends that LOFT's description of the transition process between IDEA Parts C and B is incomplete (Page 32). LOFT excluded the following important contextual information from the report. In January 2017, the OSDE Office of Special Education Services implemented a mechanism to create a unique identifier (a student testing number) that stays with children from initial eligibility for the SoonerStart program through graduation from high school. This is done through the online IEP system (EdPlan). Children in SoonerStart are assigned a student testing number, already used for school-age children, that becomes part of their permanent record and is never rescinded or changed. This creates direct alignment between the two programs and data systems, opening access to historical information about special education referrals, eligibility and services and enabling long-term tracking of child services and outcomes. It allows a more fluid system for transitions from Part C (SoonerStart) to Part B (school-age special education service). This mechanism is specifically designed to increase the efficiency of that process and to ensure continued services across both programs. Additionally, SoonerStart staff does not rely on public school partners to determine if a child needs to be referred for services. With permission from the parent, SoonerStart refers all children that are potentially eligible. A Resource Coordinator works with the family to discuss all opportunities for referral in addition to public school services.



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**Does the agency agree with the recommendations related to this finding?**

OSDE partially agrees with the agency recommendations for Finding 2.

- LOFT Agency Recommendations: Regarding the recommendations that OSDE produce a comprehensive annual report for ECE, establish a review schedule and independent evaluation, and compile a comprehensive list of early childhood services, OSDE asserts that it has neither the capacity nor the resources necessary to undertake such significant projects.

***Finding 3: Oklahoma’s Fragmented Funding Approach to Early Childhood Limits Accountability and Effectiveness***

**Does the agency agree with the facts as presented?**

The OSDE partially agrees with the facts as presented, and provides the following additional information for consideration.

- OSDE is unable to verify the numbers presented in Table 07 of the Amended Draft report that were provided by OPSR (Page 36). OSDE has provided corrected information to LOFT.
- OSDE contends that additional information is needed to put Chart 11 in context (Page 38). NIEER reported in 2018 that Oklahoma was 34<sup>th</sup> among all states in state spending for Pre-K and one state in the region reported use of local funds and one reported use of federal funds. As the NIEER report is based on states’ self-reporting, states may not have reported local funds since they do not track those funds like Oklahoma. As a result, all spending from other states may not be included.
- The OSDE factually disagrees with the statement that Oklahoma funded Pre-K “beyond the minimum cost to provide full-day and high-quality Pre-K” in the call-out box and believes additional context is needed (Page 39). NIEER reported in 2020 that Oklahoma was 25<sup>th</sup> among all states in state spending for Pre-K and only three regional states reported use of local funds and no state in the region reported use of federal funds. As the NIEER report is based on states’ self-reporting, states may not have reported local funds since they do not track those funds like Oklahoma. As a result, all spending from other states may not be included, making this statement inaccurate. On the contrary, NIEER reported that no state in the region offers universal Pre-K to all students full-day despite family income and Oklahoma is one of five states reported as spending **enough** to pay for high-quality, full-day Pre-K (NIEER, 2020). Additionally, the increase in funding nationally during this same span of time is 64%.



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**Does the agency agree with the recommendations related to this finding?**

While there are no agency recommendations for Finding 3, OSDE offers the following regarding policy considerations.

- OSDE is open to the discussion of restructuring Head Start within the Department of Education. The OSDE would be able to support districts in applying for the much-needed federal grant funds available for Head Start that are currently going untapped.

***Finding 4: Lack of Data Limits the State’s Ability to Assess Investments and Outcomes into Early Childhood Education.***

**Does the agency agree with the facts as presented?**

The OSDE partially agrees with the facts as presented, and provides the following additional information for consideration.

- OSDE contends that LOFT’s portrayal of existing performance outcome metrics is incomplete (Pages 43-44). LOFT told OSDE that the evaluation did not include an evaluation of program outcomes, yet the report, in numerous places, asserts that outcomes for ECE programs do not exist or are lacking. Specifically, LOFT asked no questions regarding the OSDE’s implementation of 70 OS § 13-122 that outlines the goals of SoonerStart, did not acknowledge SoonerStart’s full compliance with the Oklahoma Early Intervention Act, nor did it ask any questions to determine the efficacy of the program in carrying out the statute.
- OSDE factually disagrees with LOFT’s conclusion that special education metrics are “centered more on renewal and compliance...[than] measuring long-term outcomes...” (Pages 43-44). States are required to develop a state systemic improvement plan (SSIP). Oklahoma, through ICC guidance, has chosen to focus on the social/emotional development of infants and toddlers with disabilities. The program has implemented new pre- and post-screening measures and will be partnering with the state Departments of Health, Human Services, Mental Health and Substance Abuse Services, Head Starts and the Pyramid Model Consortium to develop evidence-based services for Oklahoma’s infants and toddlers. Both IDEA Parts B and C include specific results for children receiving early intervening services including positive social-emotional skills and relationships, acquisition and use of knowledge and skills, and use of appropriate behaviors to meet their needs. This information can be found on the OSDE website as well as through the Office of Special Educations Programs. Although it is not reflected in the report, 10 years of state-level indicator data for Part C was provided to LOFT, and much of it is easily accessible through the OSDE website.



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- OSDE factually disagrees with the statement “Discussions and survey results from the Oklahoma State Department of Education (OSDE) confirm that the State’s early childhood programs primary focus is on collecting data on student and family demographics and the number of families served.” This statement is incorrect and OSDE provided evidence to the contrary to LOFT for their review (Page 43).
- OSDE contends that the statement “According to OSDE, measuring reading sufficiency rates (RSR) of kindergarten through third grade would be a direct performance measure to correlate with the State’s ECE” (Page 45) is inaccurate or a misinterpretation of discussions between LOFT and OSDE. When asked if the state collects any academic data on students in kindergarten, OSDE conveyed that the agency collects beginning- and end-of-year screening data for reading from districts under the requirements of the Reading Sufficiency Act, but never indicated that this would be a direct performance metric to correlate with the State’s early childhood education programs.
- ODSE contends the portrayal of the reading screening assessments referenced in Chart 14 and surrounding text is lacking context (Page 46). These assessments are designed as predictive measures, indicating how students’ abilities at the beginning of a school year compare to the targeted skills for the end of the school year. The grade-level targets for the screening assessments, and which determine if a student is reading at benchmark, are based on national norms. Unlike in Oklahoma, kindergarten in most states is often the first formal learning experience for students. Therefore, the nationally normed targets for kindergarten screening assessments are based on an average of the data from students who attend Pre-K as well as those who did not attend Pre-K. The nationally normed targets for first-grade screeners are based on the average of students who have attended one year (kindergarten) of formal schooling. Therefore, the targets for kindergarten are much lower than those for first grade, and states and districts report a higher percentage of first-grade students not meeting benchmark screening assessments at the beginning of the year than kindergartners. The OSDE asserts that LOFT’s use of the data in Chart 14 is selective and that additional trend data should be included in the report.
  - While LOFT’s analysis looks at cohort data alone, the percentage of kindergarten students identified as at-risk at the beginning of the school year overall has declined from 2014 to 2018, signaling improvement not recognized in the LOFT report. The percentage of students identified as at-risk of reading difficulties at the end of the school year also declined over the same period, even though in 2017 more rigorous expectations were first approved in new screeners by the State Board of Education. Additionally, note that for kindergarten – and, in fact, for all grades – the percentage of students at-risk at the beginning of the year significantly declined by the end of year, meaning that students improve in their skills throughout the school year.





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Year	KG At-Risk BOY	KG At-Risk EOY
2014	37.2%	23.1%
2015	34.3%	20.8%
2016	36.3%	22.5%
2017	35.3%	21.4%
2018	33.2%	21.7%

**Does the agency agree with the recommendations related to this finding?**

The OSDE partially agrees with the agency recommendations for Finding 4.

- LOFT Agency Recommendations: The recommendation that OSDE “should examine school-level factors that may help explain the kindergarten performance disparities for students who utilized any of the State’s early childhood education services” is a lofty but costly one that presents a host of validity and reliability issues. Collecting data on such factors would be costly, requiring new systems for data collection, personnel to analyze, track data and verify accuracy of data entries, as well as require additional capacity within districts to provide such data. OSDE asserts that it has neither the capacity nor the resources necessary to undertake such data collection and recommends that a full fiscal analysis for this request be provided before decisions are made about this recommendation.
- LOFT Agency Recommendations: The OSDE strongly supports the concept of an integrated data system and stands willing to partner with other agencies to achieve this goal. The three-year Preschool Development Grant, which was not awarded to Oklahoma, would have provided much needed funding to pursue such a data system. Additionally, the OSDE made a proposal for use of state digital transformation funds, as matching funds for the U.S. Department of Education Statewide Longitudinal Data System (SLDS) grant, for data system improvements that would have funded the foundation of such a system, but the proposal went unfunded. As a result, the OSDE was not able to apply for the SLDS grant.