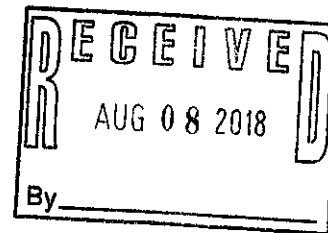


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August 8, 2018

To: Rulemaking Coordinator

From: Little Town Learning Center
Angela Beacham
PO Box 487
Burgaw, NC, 28425

Please consider the following rule amendment, as a rule making petition. (requested changes are denoted in red)

10ANCAC 09 .2902 (f) During the 185-day school year (as defined by the State Board of Education) the center shall comply with the staff-child ratio and maximum group size as follows:

AGE	RATIO STAFF/CHILDREN	MAXIMUM GROUP SIZE
0-12 Months	1 / 4	8
1 to 2 Years	1 / 5	10
2 Years and Older	1 / 6	18

For centers operating for 12 months, outside the 185 day school year (as defined by the State Board of Education), the center shall comply with the staff- child ratio and maximum group size as follows:

AGE	RATIO STAFF/CHILDREN	MAXIMUM GROUP SIZE
0-12 Months	1 / 4	8
1 to 2 Years	1 / 5	10
2 Years and Older	1 / 9	18

Reasons for the proposed rule: The change from a staff/child ratio for children age 2 years and older, of 1/6 to the still enhanced NCPK ratio of 1/9 during the time, in which school is NOT in session, is necessary for us to financially be able to continue to provide DD services for the children in our county. We are the only Developmental Day facility in our county. It is important to note that we do NOT receive any Developmental Day funds for the time when school is out for the summer and the current 1/6 ratio cannot be sustained with private tuition receipts alone for the 2 months school is not in session.

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Data supporting proposed rule: The NCCCC has already acknowledged and provided accommodations for the difference between the 185-day school year and the time that school is out for the summer in 10A NCAC 09.2903 (d) (e) by allowing for a reduction in staff qualifications. This decision recognized the fiscal and logistical impact placed upon Developmental Day Centers and Early Childhood Educators. It also acknowledged the substantial decrease in enrollment of students with diagnosed disabilities during the summer months. For our facility we may have one student whose family can afford the private pay rate that continues part time attendance during that time. Most summers we have no Developmental Day students that pay for private preschool.

Inclusion is a cornerstone of Little Town Learning Center. I strongly believe in family choice and the benefits of a diversified delivery system with respect to the field of education. Should rural facilities like Little Town Learning Center be forced to relinquish their Developmental Day Certification the prospect of a diversified delivery system may be eliminated. This would be the case for Pender County families! Your consideration and support with regard to the above-mentioned changes is greatly appreciated and respected. Please feel free to contact me if you have any questions or areas that require clarification.

Respectfully submitted,
Angela Beacham
Director/ Owner
Little Town Learning Center, Inc.
910-259-3311