

**U.S. Department of Education**  
Washington, D.C. 20202-5335



**APPLICATION FOR GRANTS  
UNDER THE**

**Preschool Development Grants - Development**

**CFDA # 84.419A**

**PR/Award # S419A150015**

**Grants.gov Tracking#: GRANT11769478**

OMB No. 1810-0717, Expiration Date: 02/28/2015

Closing Date: Oct 24, 2014

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This application was generated using the PDF functionality. The PDF functionality automatically numbers the pages in this application. Some pages/sections of this application may contain 2 sets of page numbers, one set created by the applicant and the other set created by e-Application's PDF functionality. Page numbers created by the e-Application PDF functionality will be preceded by the letter e (for example, e1, e2, e3, etc.).

Non Responsive

**Application for Federal Assistance SF-424**

* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): _____ * Other (Specify): _____
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------

* 3. Date Received: 10/23/2014	4. Applicant Identifier: _____
-----------------------------------	-----------------------------------

5a. Federal Entity Identifier: _____	5b. Federal Award Identifier: _____
-----------------------------------------	----------------------------------------

**State Use Only:**

6. Date Received by State: _____	7. State Application Identifier: _____
----------------------------------	----------------------------------------

**8. APPLICANT INFORMATION:**

* a. Legal Name: Montana Office of Public Instruction	
* b. Employer/Taxpayer Identification Number (EIN/TIN): 81-0302402	* c. Organizational DUNS: 8095887000000

**d. Address:**

* Street1: 1227 11th Avenue
Street2: P.O. Box 202501
* City: Helena
County/Parish: _____
* State: MT: Montana
Province: _____
* Country: USA: UNITED STATES
* Zip/Postal Code: 59620-251

**e. Organizational Unit:**

Department Name: _____	Division Name: _____
------------------------	----------------------

**f. Name and contact information of person to be contacted on matters involving this application:**

Prefix: _____	* First Name: Debbie
Middle Name: _____	
* Last Name: Dunsaker	
Suffix: _____	
Title: _____	

Organizational Affiliation: _____
-----------------------------------

* Telephone Number: 406-444-0733	Fax Number: 406-444-1373
----------------------------------	--------------------------

* Email: ddunsaker@mt.gov
---------------------------

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

U.S. Department of Education

**11. Catalog of Federal Domestic Assistance Number:**

S4.419

CFDA Title:

Preschool Development Grants

**\* 12. Funding Opportunity Number:**

ED-GRANTS-102314-001

\* Title:

Office of Elementary and Secondary Education (OESE): Preschool Development Grants: Development Grants CFDA Number S4.419A

**13. Competition Identification Number:**

S4 419A2015 1

Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

[Add Attachment](#)

**\* 15. Descriptive Title of Applicant's Project:**

Montana Preschool Development Program

Attach supporting documents as specified in agency instructions.

[Add Attachments](#)

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="40,000,000.00"/>
* b. Applicant	<input type="text" value="(b)(4)"/>
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes  No

If "Yes", provide explanation and attach

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:  \* Date Signed:

## ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include, but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

<b>SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</b>  <input type="text" value="Jay Phillips"/>	<b>TITLE</b>  <input type="text" value="Superintendent of Public Instruction"/>
<b>APPLICANT ORGANIZATION</b>  <input type="text" value="Montana Office of Public Instruction"/>	<b>DATE SUBMITTED</b>  <input type="text" value="10/23/2014"/>

Standard Form 424B (Rev. 7-97) Back

# DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C.1352

Approved by OMB  
0348-0046

<b>1. * Type of Federal Action:</b> <input type="checkbox"/> a. contract <input checked="" type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	<b>2. * Status of Federal Action:</b> <input type="checkbox"/> a. bid/offer/application <input checked="" type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	<b>3. * Report Type:</b> <input checked="" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change
<b>4. Name and Address of Reporting Entity:</b> <input checked="" type="checkbox"/> Prime <input type="checkbox"/> SubAwardee * Name: Office of Public Instruction * Street 1: 1227 11th Avenue    * Street 2: P.O. Box 202501 * City: Helena    * State: MT Montana    * Zip: 59620 2501 Congressional District, if known: _____		
<b>6. * Federal Department/Agency:</b> US Department of Education and DSHS	<b>7. * Federal Program Name/Description:</b> Elemental Development Grants CFDA Number, if applicable: 84.419	
<b>8. Federal Action Number, if known:</b> _____	<b>9. Award Amount, if known:</b> \$. _____	
<b>10. a. Name and Address of Lobbying Registrant:</b> Prefix _____ * First Name Denise Middle Name _____ * Last Name Jureau Suffix _____ * Street 1 _____ * Street 2 _____ * City _____ * State _____ * Zip _____		
<b>b. Individual Performing Services</b> (including address if different from No. 10a) Prefix _____ * First Name Denise Middle Name _____ * Last Name Jureau Suffix _____ * Street 1 _____ * Street 2 _____ * City _____ * State _____ * Zip _____		
<b>11.</b> Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when the transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure. * Signature: Gay Phillips * Name: Prefix _____ * First Name Denise Middle Name _____ * Last Name Jureau Suffix _____ Title: _____ Telephone No.: _____ Date: 10/21/2014		
<b>Federal Use Only:</b>		Authorized for Local Reproduction Standard Form - LLL (Rev. 7-97)

PR/Award # S419A150015



## NOTICE TO ALL APPLICANTS

The purpose of this enclosure is to inform you about a new provision in the Department of Education's General Education Provisions Act (GEPA) that applies to applicants for new grant awards under Department programs. This provision is Section 427 of GEPA, enacted as part of the Improving America's Schools Act of 1994 (Public Law (P.L.) 103-382).

### To Whom Does This Provision Apply?

Section 427 of GEPA affects applicants for new grant awards under this program. **ALL APPLICANTS FOR NEW AWARDS MUST INCLUDE INFORMATION IN THEIR APPLICATIONS TO ADDRESS THIS NEW PROVISION IN ORDER TO RECEIVE FUNDING UNDER THIS PROGRAM.**

(If this program is a State-formula grant program, a State needs to provide this description only for projects or activities that it carries out with funds reserved for State-level uses. In addition, local school districts or other eligible applicants that apply to the State for funding need to provide this description in their applications to the State for funding. The State would be responsible for ensuring that the school district or other local entity has submitted a sufficient section 427 statement as described below.)

### What Does This Provision Require?

Section 427 requires each applicant for funds (other than an individual person) to include in its application a description of the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs. This provision allows applicants discretion in developing the required description. The statute highlights six types of barriers that can impede equitable access or participation: gender, race, national origin, color, disability, or age. Based on local circumstances, you should determine whether these or other barriers may prevent your students, teachers, etc. from such access or participation in the Federally-funded project or activity. The description in your application of steps to be taken to overcome these barriers need not be lengthy; you may provide a clear and succinct

description of how you plan to address those barriers that are applicable to your circumstances. In addition, the information may be provided in a single narrative, or, if appropriate, may be discussed in connection with related topics in the application.

Section 427 is not intended to duplicate the requirements of civil rights statutes, but rather to ensure that, in designing their projects, applicants for Federal funds address equity concerns that may affect the ability of certain potential beneficiaries to fully participate in the project and to achieve to high standards. Consistent with program requirements and its approved application, an applicant may use the Federal funds awarded to it to eliminate barriers it identifies.

### What are Examples of How an Applicant Might Satisfy the Requirement of This Provision?

The following examples may help illustrate how an applicant may comply with Section 427.

- (1) An applicant that proposes to carry out an adult literacy project serving, among others, adults with limited English proficiency, might describe in its application how it intends to distribute a brochure about the proposed project to such potential participants in their native language.
- (2) An applicant that proposes to develop instructional materials for classroom use might describe how it will make the materials available on audio tape or in braille for students who are blind.
- (3) An applicant that proposes to carry out a model science program for secondary students and is concerned that girls may be less likely than boys to enroll in the course, might indicate how it intends to conduct "outreach" efforts to girls, to encourage their enrollment.

We recognize that many applicants may already be implementing effective steps to ensure equity of access and participation in their grant programs, and we appreciate your cooperation in responding to the requirements of this provision.

### Estimated Burden Statement for GEPA Requirements

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. Public reporting burden for this collection of information is estimated to average 1.5 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The obligation to respond to this collection is required to obtain or retain benefit (Public Law 103-382). Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Education, 400 Maryland Ave., SW, Washington, DC, 20210-4537 or email [ICDocketMgr@ed.gov](mailto:ICDocketMgr@ed.gov) and reference the OMB Control Number 1894-0005.

## Optional - You may attach 1 file to this page.

	Add Attachment		
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## CERTIFICATION REGARDING LOBBYING

### Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

### Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

#### \* APPLICANT'S ORGANIZATION

Montana Office of Public Instruction

#### \* PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE

Prefix:  \* First Name: Denise Middle Name:

\* Last Name: Tineau Suffix:

\* Title: Superintendent of Public Instruction

\* SIGNATURE: Jay Phillips

\* DATE: 10/23/2014

## Abstract

The abstract narrative must not exceed one page and should use language that will be understood by a range of audiences. For all projects, include the project title (if applicable), goals, expected outcomes and contributions for research, policy, practice, etc. Include population to be served, as appropriate. For research applications, also include the following:

- Theoretical and conceptual background of the study (i.e., prior research that this investigation builds upon and that provides a compelling rationale for this study)
- Research issues, hypotheses and questions being addressed
- Study design including a brief description of the sample including sample size, methods, principals dependent, independent, and control variables, and the approach to data analysis.

[Note: For a non-electronic submission, include the name and address of your organization and the name, phone number and e-mail address of the contact person for this project.]

---

## You may now Close the Form

**You have attached 1 file to this page, no more files may be added. To add a different file, you must first delete the existing file.**

\* Attachment:

## **Montana Preschool Development Grant**

Applicant: The State of Montana

### **Project Overview**

Montana is focused on increasing high-quality preschool for children throughout the state as evidenced by Governor Bullock's Early Edge Preschool Initiative which would provide \$37 million in state funds for preschool education, new program and accreditation standards for state-funded preschool, and revised education requirements and licensure qualifications for public preschool teachers. These are critical steps to ensuring a quality education for Montana's youngest learners, but the state also faces some challenges. Montana is geographically vast with a sparse population. Nearly half of Montana children live at or below 200% of the federal poverty level.

This grant will help Montana improve access to high quality preschool education in 16 high needs communities, eight of which are on Indian lands. The Governor's Office, The Office of Instruction, and The Department of Health and Human Services will implement the grant. Montana has instituted successful early literacy programs in high needs communities and these programs will serve as models and mentors for new programs that are added each year of the grant.

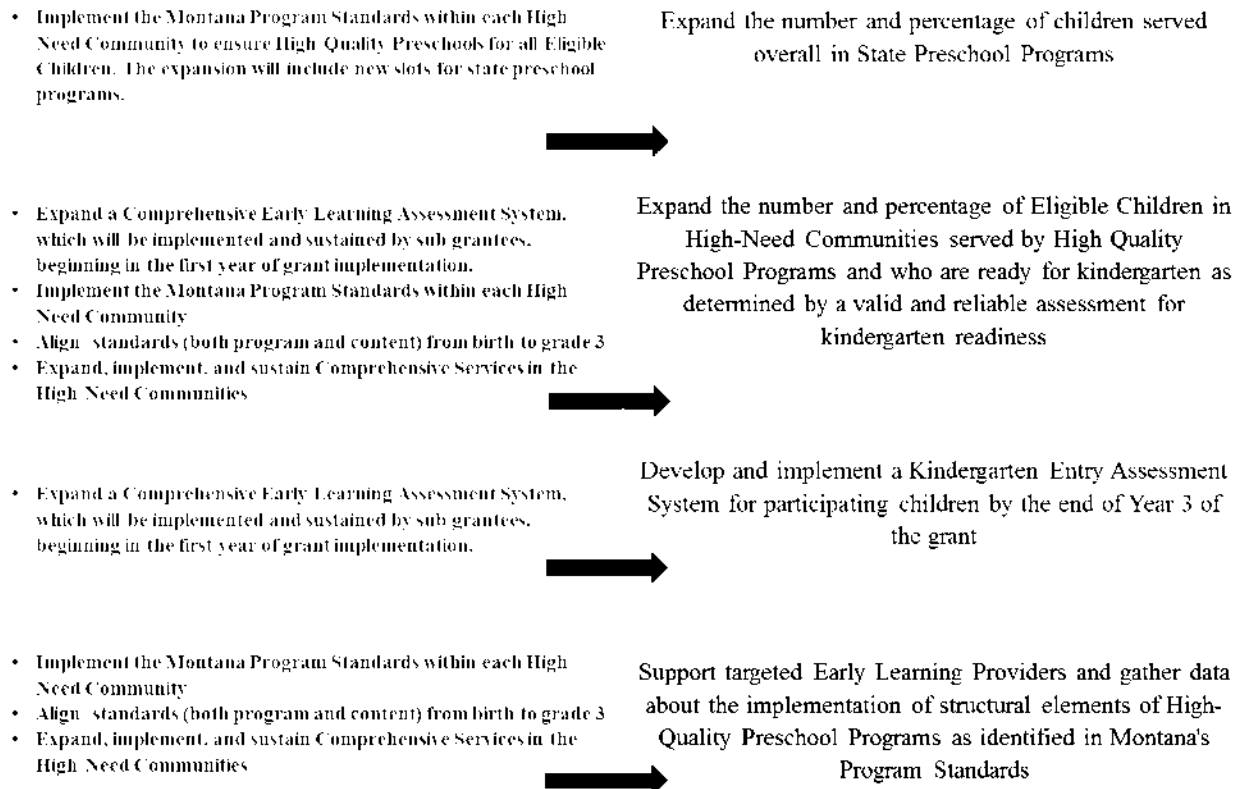
The Subgrantees have been categorized in Cohorts. Cohort I consists of Early Learning Providers that have been part of the Montana Striving Readers Project (MSRP) and have already begun to implement many of the components of Montana's Program Standards. Cohort II consists of Early Learning Providers who are in districts that are implementing a MSRP. Cohort III consists of Head Starts on Indian Reservations that do not have schools participating in the MSRP. Cohort I will serve as a mentor to Cohorts II and III through ongoing collaboration and site visits facilitated by the State Implementation Team.

### **Proposed Project Activities and Objectives**

The State will accomplish the project activities and objectives in phases: Phase 1: Developing, Phase 2: Expanding, Phase 3: Implementing, and Phase 4: Sustaining. All activities will ultimately lead to the sustaining phase. The State has four primary ambitious and achievable outcomes, which will be measured by our external evaluator Education Northwest. See table below for project activities and outcomes.

## Project Activities

## Project Outcomes



## Other Organizations

The State proposes to work in collaboration with the following organizations: 1) the three Cohorts of Early Learning Providers and LEAs, including Head Starts and Tribal Head Starts, 2) the Divisions within the OPI, including Title I, Special Education, Accreditation, and Indian Education For All, 3) the Divisions and bureaus within the DPHHS including Children's Mental Health Bureau, Child and Family Services Division, Family and Community Health Bureau which includes home visiting, and the Human and Community Services Division which includes the Early Childhood Services Bureau and Public Assistance Programs targeting low income vulnerable Montanans, 4) The Governor's Best Beginnings Advisory Council, 5) the Early Childhood Project through Montana State University and the Early Childhood Higher Education Consortium, and 6) Montana's Public Libraries.

## Project Narrative File(s)

---

\* **Mandatory Project Narrative File Filename:**

---

To add more Project Narrative File attachments, please use the attachment buttons below.

OFFICE OF THE GOVERNOR  
STATE OF MONTANA

STEVE BULLOCK  
GOVERNOR



JOHN WALSH  
LT. GOVERNOR

October 14, 2014

Preschool Development Grant  
The Honorable Arne Duncan  
The Honorable Sylvia M. Burwell  
400 Maryland Ave., SW  
Washington, D.C. 20202

Dear Secretary Duncan and Secretary Burwell:

As a father of three young children, I believe that our most important responsibility as a state is to ensure that the next generation has every opportunity to succeed and reach their full potential.

We know that when all children arrive at kindergarten ready to learn, it allows them to hit the ground running in their educational career, and it also helps to reduce disciplinary challenges, so teachers can focus on teaching, instead of dealing with behavioral issues. This means that all children will get the attention and focus that they deserve in the classroom.

We have made early childhood education a top priority in this state and over the last two years, and are improving access to and opportunity for high-quality early learning experiences.

- Funding from the 2013 Legislature into STARS to Quality (Montana's QRIS) allowed for an expansion that doubled the number of programs on the road to quality whole substantially increasing the number of children receiving high-quality services.
- The Board of Public Education has begun their work to develop content and accreditation standards and qualifications for teachers of preschool programs in or attached to public schools. These standards, which I anticipate will be adopted prior to the end of this calendar year, ensure that preschool classrooms are geared toward student success, and have the qualified educators necessary to support student learning. The standards are aligned with exiting measures of quality including STARS, Head Start standards and NAEYC accreditation.
- My FY16-17 Executive Budget Proposal will include (b)(4) for "Early Edge MT Block Grants" to support high-quality, voluntary preschool for four-year-olds across the state.
- Teachers and caregivers across the state, business leaders who convened in May to learn about the importance of early childhood education, school administrators and community leaders, legislators and editorial boards have all joined the conversation about how we can better support Montana's youngest learners.

While we have made progress, we still have a long way to go. Montana's unique geography and sparse population across most of the state pose unique challenges for access to many services, including high-quality early childhood programs. Our seven sovereign Indian Reservations are some of our highest need areas, and are generally far from large population centers. This grant presents an incredible

opportunity to give children in some of these high-need areas across the state access to high-quality preschool programs and a chance at success that they would not otherwise have.

Superintendent Denise Juneau, Department of Health and Human Services Director Richard Opper and I are honored to submit this application, which compliments and enhances what we are doing and will be able to do with state resources. Our proposal employs a cross-sector approach to early childhood that keeps the child and family at the center. Our proposal will support both new and expanded high-quality preschool slots where they are the most needed and will have the highest impact, specifically, Montana's reservation communities.

Thank you for your commitment to early childhood and for the opportunity to enhance and expand opportunities for Montana's children. It is the most important and exciting investment we can make.

Sincerely,



STEVE BULLOCK  
Governor





Montana  
**Office of Public Instruction**  
Denise Juneau, State Superintendent

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October 14, 2014

The Honorable Arne Duncan  
The Honorable Sylvia Mathews Burwell  
400 Maryland Ave.  
Washington, D.C. 20202

Dear Secretary Duncan and Secretary Burwell:

The Office of Public Instruction will be the lead agency for the Montana's Preschool Development Grant. This grant represents a great opportunity to move our state closer to providing high quality preschool for all Montana's children.

In the past year, I have recommended new standards to the Montana Board of Public Education that will ensure Montana's children receive a high quality preschool education. These new standards are set for adoption in November 2014 and will be part of Administrative Rule for the state of Montana. The recommendations include:

- program and accreditation standards for preschools funded with state dollars;
- licensure requirements for educators working in accredited preschools, and
- program requirements for institutions of higher education that offer a credential in Early Childhood Education.

While Montana is laying the groundwork for expanded preschool opportunities, many of the children in this state, particularly in high needs communities and on Indian lands, do not have access to high-quality early learning to help them reach their full potential. Research consistently shows that access to quality preschool education benefits all children and particularly those from low-income families.

This proposal builds on the strong collaboration of community leaders, early childhood educators, K-12 education higher education, and local and tribal Head Start programs to ensure that our most vulnerable children gain the knowledge and skills they need to be ready for kindergarten. The Office of Public Instruction has experience working on early childhood learning through its Montana Striving Readers, Early Reading First and the Indian Education Division's curriculum and professional development resources for early childhood programs.

In addition, the agency has the infrastructure capacity to administer and monitor grants, track longitudinal data, and oversee a multi-faceted project with many community and state level stakeholders.

Governor Steve Bullock and I share the commitment to expand high quality preschool education in our state. Investing in our youngest learners will greatly benefit Montana's future. I urge your support of Montana's Preschool Development Grant.

Sincerely,

A handwritten signature in black ink, appearing to read "Denise Juneau". The signature is fluid and cursive, with a large initial "D" and a long, sweeping underline.

Denise Juneau  
Montana Superintendent of Public Instruction

## **A. Executive Summary**

### **(A)(1) The State's Progress to Date**

Montana is building a strong foundation for implementing High-Quality Preschool Programs so that all young children, especially those with high needs, have the best opportunity for development of the knowledge and skills they need to succeed in school. (See Appendix, p. 126 for list of General Reference documents.) The State has increased collaboration among the Department of Health and Human Services (DPHHS), the Office of Public Instruction (OPI), and the Governor's Office to provide a continuum of quality services for birth through grade 3.

Montana has:

- Updated the Montana Early Learning Standards (MELS) to help ensure children birth to age five develop the skills and knowledge they need to be prepared for kindergarten;
- Established Preschool Standards of Accreditation (Montana Preschool Program Standards);
- Amended Educator Preparation Program Standards to prepare early childhood educators;
- Added new licensure opportunities for Early Childhood Educators..

Early Edge Montana initiative is the Governor's proposed plan to provide state funding for High-Quality Preschool Programs for four-year-olds, guaranteeing that every child in Montana has the opportunity to reach his or her full potential. The Governor's Office has also established the Best Beginnings Advisory Council, a broad group of early childhood stakeholders to improve collaboration and coordination across the spectrum of governmental and nonprofit organizations providing early childhood services.

### **Montana Early Learning Standards (MELS)**

Coming from the Early Learning Content Standards described in the Montana Preschool Program Standards, the Montana Early Learning Standards (MELS) are organized according to four core domains: emotional/social, physical, communication, and cognition. These core domains cover the Essential Domains of School Readiness (Table 1). They are universally designed and developmentally, culturally, and linguistically appropriate. (See Appendix, pp. 20-41)

<b>Table 1: Comparison of Essential Domains of School Readiness and Montana Early Learning Standards (MELS)</b>	
<b>Essential Domains of School Readiness</b>	<b>Montana Early Learning Standards (MELS)</b>
Language and Literacy	Core Domain 3: Communication
Cognition and General Knowledge (Early Mathematics and Scientific Development)	Core Domain 4: Cognition
Approaches Toward Learning	Core Domain 4: Cognition
Physical Well-being and Motor Development	Core Domain 2: Physical
Social and Emotional Development	Core Domain 1: Emotional and Social

The MELS outlines a set of expectations, guidelines, or developmental milestones that describe what all children from birth to kindergarten entry should know and be able to do. The standards can be described as broad categories, or dimensions, reflective of children’s learning and development, which provide a continuum of benchmarks and indicators without listing specific ages; each child’s development can be identified and observed over time on the continuum.

Montana Preschool Program Standards

The State is in the process of establishing new Preschool Standards of Accreditation. These Montana Preschool Program Standards are found in Chapter 63 of the Administrative Rule of Montana (Appendix, pp. 53-63). These standards were developed through cross-sector collaboration of a thorough crosswalk of the NAEYC Accreditation Standards, Montana Early Care and Education Knowledge Base, Montana OPI Chapter 55 Accreditation Standards for K-12, and Head Start Performance Standards, and reflect best practices for High-Quality Preschool Programs.

Educator Preparation Program Standards

The State is amending the Educator Preparation Program Standards found in Chapter 58 of the Administrative Rule of Montana. These standards are used by institutions of higher education to prepare early childhood educators. They will also be used to design early childhood programs of study; assess student’s knowledge, skills, and dispositions; and determine an early childhood higher education program’s effectiveness. See Appendix (pp. 10-13) for additional information about Educator Preparation Program Standards.

## Montana Preschool Development Grant

### Teacher Education and Licensure Requirements

The State is upgrading preschool teacher education and licensure requirements, which are found in Chapter 57 of the Administrative Rule, which includes educator licensure rules that govern the types of licenses and endorsements available and how teachers can apply for and renew their licenses. (See Appendix (pp. 8-9) for additional information about Endorsements.

### Governor's Early Edge Montana Initiative

Governor Bullock has proposed the Early Edge Montana initiative to ensure each child in Montana the opportunity to reach his or her full potential. During the 2015 legislative session, Governor Bullock will bring forward a funding proposal for voluntary, preschool that is open to all four-year-olds. The plan calls for \$<sup>(b)(4)</sup> over the next biennium. The funds will be block-granted to school districts that apply and meet the criteria for High-Quality Preschool Programs as defined by Montana Preschool Program Standards.

### Best Beginnings Advisory Council

The Governor's Office has established the Best Beginnings Advisory Council, a broad group of early childhood stakeholders to improve collaboration and coordination across the spectrum of governmental and nonprofit organizations providing early childhood services. In addition, local Best Beginnings Coalitions have been created to support community efforts. These Coalitions are located in High-Need Communities covering much of the state. Along with engaging local communities, the formation of the coalitions has also allowed Montana to build system capacity for delivering services to high-need families such as evidence-based maternal, infant, and early childhood home visiting services. The Best Beginnings Advisory Council will coordinate with the State Implementation Team to support Subgrantees in the implementation of High-Quality Preschool Programs. Local Best Beginnings Coalitions will be instrumental in collaborating with Subgrantees in High-Need Communities to ensure Eligible Children have the services and supports to attain the essential kindergarten readiness skills outlined in the Montana Early Learning Standards (MELS).

### **(A)(2) Provide High-Quality Preschool Programs in One or More High-Need Communities**

This grant will fund three cohorts of Subgrantees who will assure that our High-Need Communities have enhanced opportunities to support school readiness for Eligible Children. Cohort I consists of Early Learning Providers that have been part of the Montana Striving Readers Project (MSRP) and have already begun to implement many of the components of the

## Montana Preschool Development Grant

Montana Preschool Program Standards. Cohort II consists of additional Early Learning Providers who are in districts that are implementing the MSRP. Cohort III consists of Head Starts on Indian Reservations that do not have schools participating in the MSRP. Cohort I will serve as a mentor to Cohorts II and III through ongoing collaboration and site visits facilitated by the State Implementation Team.

### **(A)(3) Increase the Number and Percentage of Eligible Children Served in High-Quality Preschool Programs.**

The State will increase the number and percentage of Eligible Children served in High-Quality Preschool Programs during each year of the grant period through the creation of new, and the improvement of existing, State Preschool Program slots. In the first year of the grant, the number for improved Preschool Slots will be 248 children. This number will increase during the second, third, and fourth years. In the first year of the grant, the number for new Preschool Slots will be 1,138 children. This number will increase to 1,613 children in the second, third, and fourth years. See Table A (Excel Spreadsheets) for the number of Eligible Children to be served each year of the grant and the number and percentage of State Preschool Program slots.

### **(A)(4) Characteristics of High-Quality Preschool Programs**

The Montana Preschool Program Standards have all the characteristics, or structural elements, specified in the definition of High-Quality Preschool Programs.

#### Staff Qualifications

Teachers must have a bachelor's degree and must be licensed and endorsed in accordance with state statutes and Montana Board of Public Education rules. Early childhood paraprofessionals must have:

- (a) completed two years of study at an institution of higher education; or
- (b) obtained an associate (or higher) degree; or
- (c) obtained a high school diploma and be able to demonstrate the knowledge and the ability to assist in the instruction, and program delivery to support students' development of the knowledge and skills outlined in the MELS.

Subgrantees have committed to guaranteeing that instructional staff salaries are comparable to the salaries of local K-12 instructional staff. Additional information on staff qualifications is detailed in criterion (C)(1)(e) and (C)(1)(f), in accordance with Montana Board of Public Education Administrative Rule.

## Montana Preschool Development Grant

### Child-to-Instructional Staff Ratio and Class Size

Subgrantees will comply with Montana Preschool Program Standards of Accreditation, or Chapter 63 (Appendix, pp. 53-63), which states that there must be one appropriately licensed and endorsed teacher for every 10 children. In classrooms having over 10 children, there must be an early childhood paraprofessional for up to no more than 18 total children in a classroom with two adults. A class size of 18 preschoolers is the maximum number of children, regardless of the number of staff.

### Full-Day Program

Subgrantees will be required to provide full-day programs of no less than five hours per day and will include children with disabilities and English Language Learners (ELL) who will have access to and full participation in all learning opportunities. Subgrantees will also comply with evidence-based health and safety standards outlined in Chapter 55, Accreditation Standards for K-12. Additional information on program standards is detailed in criterion (C)(1)(b).

### High-Quality Professional Development

The State Implementation Team (Table 2) will coordinate with the State Leadership Team to provide ongoing professional development to Subgrantees through on-site support and annual summer institutes. Participating Early Learning Providers will learn how to provide High-Quality Preschool Programs that are developmentally appropriate, and culturally and linguistically responsive, through the delivery of evidence-based curricula and learning environments that are aligned with the Montana Early Learning Standards (MELS). Staff will receive training for providing individualized accommodations and supports so that all children can access and participate fully in learning activities. Refer to the rigorous Plan for Professional Development, which is outlined in the Appendix (pp. 90-111).

### Continuous Improvement of High-Quality Preschool Programs

The State will measure preschool quality through the Plan for Continuous Improvement of High-Quality Preschool Programs which outlines systemic processes for planning, implementing, and evaluating the success of a High-Quality Preschool Programs Program through a Continuous Improvement Cycle. Two times a year, Subgrantees will be required to complete the Montana Program Needs Assessment, which guides Early Learning Providers in implementing the Montana Preschool Program Standards. The State will utilize this information combined with student outcome measures, Measures of Environmental Quality, and Measures of the Quality of

## Montana Preschool Development Grant

Adult-Child Interactions to guide its decision making. This data will also be analyzed by an external evaluator, Education Northwest, to evaluate program effectiveness and direct state and local continuous improvement efforts.

### Family Engagement

Subgrantees will be required to hire a Family Engagement Coordinator who provides on-site parental support services and community engagement activities to include comprehensive services that promote children's learning and development. The Family Engagement Coordinators will also work with the Best Beginning Coalitions to ensure families receive comprehensive services by providing professional development to participating Early Learning Providers on strategies for engaging families. Additional information on family engagement is detailed in criterion (C)(1)(i), (C)(1)(j), and criterion F.

### **(A)(5) Set Expectations for School Readiness**

The State will implement a Comprehensive Early Learning Assessment System by expanding the current inventory of assessments that are currently being used. This expansion will include valid and reliable screening and formative assessments for measuring outcomes of participating children across the Essential Domains of School Readiness. The results of these assessments will be used to attain the skills and knowledge in the Montana Early Learning Standards (MELS), and to ensure successful transition from preschool to kindergarten. By the end of the second year of the grant, the State will also implement a Kindergarten Entry Assessment (KEA) to be used by all participating Early Learning Providers. The KEA will allow the Subgrantees and elementary schools to measure outcomes of participating children across the Essential Domains of School Readiness during the first few months of their admission into kindergarten. Subgrantee feeder kindergarten classrooms will administer the assessments in the fall of year three of the grant. This plan is communicated in goal three of the Plan for Comprehensive Early Learning Assessment (Appendix, pp. 69-76). Results of the assessment will be used to inform efforts to close the school-readiness gap at kindergarten entry, to inform instruction in the early elementary school grades, to inform parents about their children's status, and to involve parents in decisions about their children's education. Additional information on the development of expectations for the school readiness of children upon kindergarten entry can be found in (C)(3) and in the Plan for Comprehensive Early Learning Assessment in the Appendix (pp. 69-76).

### **(A)(6) Supported by a Broad Group of Stakeholders**



## Montana Preschool Development Grant

The Governor's Office, the Office of Public Instruction, the Department of Public Health and Human Services will work together to implement the State's plan. The Best Beginnings Advisory Council is the Governor's advisory group for early childhood. This group of stakeholders includes numerous early childhood advocates, service providers, reference and referral agencies, public health and safety agencies, and many others. The Best Beginnings Advisory Council focuses on the multiple systems for impacting young children and families, particularly those with high needs. The goal of the group is to improve collaboration and coordination across the spectrum of governmental and nonprofit organizations providing early childhood services, including health and mental health services, family support and parent education, and early care and education.

The State will form a State Leadership Team that will oversee the implementation of the State's grant. Team Members will include representatives from Montana's Governor's Office, Office of Public Instruction (OPI), and Department of Health and Human Services (DPHHS). The State Leadership Team will meet three times a year; these meetings will be scheduled at the same time as meetings of the Best Beginnings Advisory Council. At these meetings, current data from the State will be reviewed, and work groups will be formed to provide critical information and professional learning opportunities for the State Implementation Team. Table 2 outlines the plan for the State Leadership Team in supporting the State's grant application.

<b>Team Members</b>	<b>Roles and Responsibilities</b>
<b>State Governor's Office</b>	<ul style="list-style-type: none"><li>• Align existing OPI and DPHHS systems and services</li><li>• Develop a Preschool Guidance Document.</li><li>• Review State data and make recommendations to the State Implementation Team.</li><li>• Work with Best Beginnings Advisory Council and Best Beginnings Coalitions</li></ul>
<b>State Office of Public Instruction (OPI)</b>	
<b>State Department Health and Human Services (DPHHS)</b>	

The State has support from a broad group of stakeholders. See Appendix (p. 67) for Best Beginnings Advisory Council Members, which include Early Learning Intermediary Organizations and state and local early learning councils. See also Letters of Support and Letters of Intent from Subgrantees.

**(A)(7) Allocate Funds Between—**

**(A)(7)(a) Activities to Build or Enhance Infrastructure Using No More than 35% of Funds**

## Montana Preschool Development Grant

The State will allocate funds to build or enhance State Preschool Program infrastructure using no more than 35 percent of its federal grant funds. Activities include monitoring and evaluation and other quality-enhancing activities to improve the delivery of High-Quality Preschool Programs to Eligible Children. The State will use \$3,500,000 per year for State Level Infrastructure. Refer to Table A (Excel Spreadsheets) for the number of Eligible Children to be served each year of the grant and the number and percentage of State Preschool Slots.

### **(A)(7)(b) Subgrants Using at Least 65% of Funds**

**(A)(7)(b)(i)** State will provide High-Quality Preschool Programs to Eligible Children no later than the end of year two of the grant period. Cohort I will begin implementation by August 2015. Refer to Table A (Excel Spreadsheets) for the number of Eligible Children to be served each year of the grant and the number and percentage of State Preschool Slots. The State will implement High-Quality Preschool Programs as defined by the Montana Preschool Program Standards, for Eligible Children in 16 High-Need Communities, including 8 communities located on Indian Lands.

**(A)(7)(b)(ii)** The State will subgrant at least 65 percent of its Federal grant funds to its Subgrantees over the grant period as evidenced in Table A (Excel Spreadsheets). The State will allocate \$6,500,000, annually, which is 65 percent of the funds to Subgrantees over the grant period. In the first year of the grant, the State will serve 1,138 eligible children. In the second, third, and fourth years, the State will serve 1,613 children. See Table A (Excel Spreadsheets), Part III, 3A for evidence of number of children that will be served by grant funds and State (Governor Bullock's Early Edge Montana initiative) funds. See Table A (Excel Spreadsheets), 2C, 2D, 2H, and 2I for number of children that will be served in New Preschool Slots and Improved Preschool Slots.

**(A)(7)(b)(iii)** The State will support each Subgrantee in culturally and linguistically appropriate outreach and communication efforts in order to ensure that all families, including those who are isolated or otherwise hard to reach, are informed of the opportunity and encouraged to enroll their children in available programs. This outreach is particularly important in our communities on Indian lands. As evidenced in criterion (F) and Plan for Professional Development (Appendix, pp. 90-111), the Subgrantees and Best Beginnings Coalitions will conduct a Community Needs Assessment to work with families to ensure eligible children are encouraged to enroll in High-Quality Preschool Programs. See also information contained in Table A (Excel Spreadsheets) for

## Montana Preschool Development Grant

the number of Eligible Children to be served each year of the grant and the number and percentage of state preschool program slots.

### **B. Commitment to High-Quality Preschool Programs**

#### **(B)(1) Early Learning and Development Standards**

Montana's Early Learning Guidelines for Children 3 to 5 (2004) and Montana's Early Learning Guidelines for Infants and Toddlers (2009) were incorporated into one document that represents a continuum of growth and development for children from birth to age 5. This integrated document is called the 2014 Montana Early Learning Standards (MELS) (See Appendix, pp. 20-41).

The MELS outlines a set of expectations, guidelines, or developmental milestones that describe what all children from birth to kindergarten entry should know and be able to do. The standards can be described as broad categories, or dimensions, reflective of children's learning and development, which provide a continuum of benchmarks and indicators without listing specific ages; each child's development can be identified and observed over time on the continuum. The MELS reflect current evidence-based research for English Language Learners and children with disabilities particularly in the areas of brain development, the effects of traumatic stress, and cultural and linguistic diversity, including significant and meaningful inclusions of Montana Indian Education for All (IEFA) resources. The MELS were reviewed and modified by a task force of early childhood leaders and experts from across the state, including higher education, the Montana Early Childhood Project, Child Care Plus (inclusion experts), Montana Office of Public Instruction (OPI), Head Start Collaboration Office, Head Start representatives, resource and referral agencies, and preschool directors. Montana's plan is to establish a review process of these standards every five years to ensure they are informed by the newest and best evidence-based practices for working with children and establishing curriculum goals.

The MELS guides the work of early childhood professionals to ensure that children from birth to age five have the skills and knowledge they need to be successful when they enter kindergarten. It describes what all children from birth to kindergarten entry should know and be able to do and their dispositions toward learning. The MELS is organized according to four core domains: emotional and social, physical, communication, and cognition. These domains thoroughly cover the Essential Domains of School Readiness and are universally designed and developmentally,

culturally, and linguistically appropriate.

<b>Table 3: Comparison of Essential Domains of School Readiness and Montana Early Learning Standards</b>	
<b>Essential Domains of School Readiness</b>	<b>Montana Early Learning Standard (MELS)</b>
Language and Literacy	Core Domain 3: Communication
Cognition and General Knowledge (Early Mathematics and Scientific Development)	Core Domain 4: Cognition
Approaches Toward Learning	Core Domain 4: Cognition
Physical Well-being and Motor Development	Core Domain 2: Physical
Social and Emotional Development	Core Domain 1: Emotional and Social

**(B)(2) State’s Financial Investment**

For the 2014 biennium, the Governor included funding for the Best Beginnings STARS to Quality Program for the 2014 biennium. The Best Beginnings STARS to Quality Program is a voluntary, tiered quality improvement system comprised of set but achievable criteria designed to support early childhood programs in improving the quality of their educational and support services for young children. The State Legislature has identified one-time only funds through a (b)(4). Governor Bullock’s budget request for the 2016 biennium includes \$ (b)(4) in State funds to continue to improve early childhood settings for community based providers in 2014-2015. An additional \$ (b)(4) has been requested in the 2015 legislative session for each year of the 2016 biennium. See Tables A and B in the Excel Spreadsheets for evidence of funding in 2014.

**(B)(3) Enacted or Pending Legislation, Policies, and/or Practices**

Montana currently does not have a state preschool program. However, the State has demonstrated its current and future commitment to increasing access to High-Quality Preschool Programs for Eligible Children through the following enacted and pending legislation, policies, or practices: 1) Governor Bullock’s Early Edge Montana block grants; 2) Montana Preschool Program Standards; 3) Achievement in Montana (AIM) Longitudinal Data System; and 4) Best Beginnings STARS to Quality Program. Here is the evidence:

**1. Governor Bullock’s Early Edge Montana Block Grants**

During the 2015 legislative session, Governor Steve Bullock will bring forward a proposal for voluntary, preschool that is open to all four-year-olds. The plan calls for (b)(4) over the

