



DISTRICT OF COLUMBIA

OFFICE OF THE STATE SUPERINTENDENT OF

EDUCATION

MEMORANDUM

To: FY20 Pre-K Enhancement and Expansion Programs

From: Elizabeth Groginsky, Assistant Superintendent
Division of Early Learning

Date: August 28, 2019

Re: Clarification of requirements for pay parity and hours of operations

The purpose of this memorandum is to provide guidance about the regulatory requirements to providers participating in the Office of the State Superintendent's (OSSE) Pre-K Enhancement and Expansion program (PKEEP) regarding pay parity and hours of operations.

I. Pay Parity

According to 5-A DCMR § 3501.1(f), a community-based organization designated as high-quality and providing pre-K education services must ensure that teachers and assistant teachers are paid **wages** equivalent to District of Columbia Public School pre-K teachers or assistant teachers, respectively, based on years of experience.

To comply with this provision, programs should follow the Washington Teacher's Union ET-15 FY19 Pay Schedule at <https://dcps.dc.gov/sites/default/files/dc/sites/dcps/publication/attachments/ET-15%20FY%2019%20Pay%20Schedule.pdf> for teacher salaries. It should be noted that, at this time, the DCPS salary schedule for para-professional or educational aides should not be used to determine the salary of PKEEP assistant teachers because educational requirements for DCPS para-professional/educational aides are not equivalent. PKEEP programs should establish an assistant teacher pay rate that **exceeds** the DCPS para-professional/education aides pay schedule and that appropriately compensates high-quality pre-K assistant teachers for their level of training and years of experience. For guidance, please see [Modeling the Cost of Care in the District of Columbia](#), where it was assumed a lead teacher in a center-based pre-K program with a quality or high-quality designation, who is required to meet the equivalent qualifications as an assistant teacher in PKEEP would earn at least \$39,758 in compensation annually (i.e., in a 12-month period).¹ Facilities with the PKEEP designation have the discretion to pay more than this baseline amount, though they cannot pay assistant teachers less than \$39,758 as an annual salary.

Wages for teachers should be paid based on the 10-month schedule listed in the above link. Providers shall **not** use PKEEP funds to pay high-quality pre-K teachers and assistant teachers for any hours worked beyond the 10-month schedule. The 10-month schedule provides for 196 teacher days, which includes

¹ The minimum 10-month salary for assistant teachers would be \$35,090.

180 days of instruction. Accordingly, salary for high-quality pre-K teachers and assistant teachers includes any pre-service training that occurs prior to the first day of schools so long as it aligns with the calendar provided in the section below.

Programs may employ high-quality pre-K teachers and assistant teachers during the summer months when there is no PKEEP program implemented. In these instances, the program is ***only*** required to compensate teachers/assistants based on the living wage requirements and not the pay schedule referenced above. For example, if a high-quality assistant teacher agrees to work during summer, the program and the assistant teacher will agree on a set pay schedule for the hours worked during summer that meets or exceeds the District of Columbia's living wage requirements.

If a program is unable to pay teachers at parity, a provider may apply for a waiver pursuant to 5-A DCMR § 3501.3 *et seq.* OSSE will review waiver requests upon receipt and may grant the waiver for no more than 12 months.

II. Hours of Operation:

According to 5-A DCMR § 3500.3(g) a community-based organization designated as high-quality and providing pre-K education services must “operate Monday through Friday, beginning no earlier than 7:00 a.m.; provide at least six and a half (6.5) hours of pre-K education services, at least thirty-nine (39) weeks a year, for a total of at least one hundred eighty (180) days; and follow the holiday and closing calendar schedule of the District of Columbia Public Schools.”

To comply with this provision, programs should follow the 2019-2020 School Year Calendar for DCPS at https://dcps.dc.gov/sites/default/files/dc/sites/dcps/publication/attachments/DCPS_SY19-20_TY_Calendar_Proposal.pdf. Compliance with this provision requires programs to observe all federal holiday closings and breaks.

Please contact Christina Crayton, early childhood education policy officer at Christina.Crayton@dc.gov or on (202) 442-4716 if you have questions.