



**Jessica Vega Pederson**  
**Multnomah County Chair**

501 SE Hawthorne Blvd., Suite 600  
Portland, Oregon 97214  
Phone: (503) 988-5090  
Email: [mult.chair@multco.us](mailto:mult.chair@multco.us)

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Jennifer McGuirk, MPA, CIA  
Multnomah County Auditor  
501 SE Hawthorne Blvd., Room 601  
Portland, OR 97214

Dear Auditor McGuirk,

On behalf of myself, the Chief Operating Officer, the Chief Financial Officer, and the Preschool and Early Learning Division, I would like to thank the Multnomah County Auditor's Office for performing a detailed audit of Preschool for All and providing recommendations for improvement. We value your office's insights and are committed to continuous improvement as we implement the program.

Preschool for All (PFA) is implementing an ambitious program model for our community. A program that allows all children to have the opportunity to attend a preschool that's right for them and that every family can afford. In Multnomah County, we believe every child deserves the best possible start in life—no matter their background, ZIP code, or family income.

Early learning has been historically devalued and underinvested in. Preschool for All represents a crucial opportunity to improve the lives of children and families in Multnomah County. It is an investment in the essential infrastructure of our community, Universal preschool also enables more parents to enter and participate fully in the workforce, benefitting employers and the County as a region.

PFA is now in its third year of serving children and families and growing to universal preschool in 2030. Implementing a new program inevitably comes with deep learning, iterating, and improving. Many program changes, including recommendations from providers and changes focused on the inclusion of children with disabilities, have already been implemented. Preschool for All must balance families' expectations for quality care while increasing the number of providers and preschool seats. The program remains on track to reach universal in 2030 and will need to adeptly navigate the risks ahead, including increasing the workforce and the number of preschool facilities.

Early learning is complex and involves multiple systems. PFA incorporates a mix of small and large businesses, schools and non-profit organizations into a cohesive system that focuses on inclusion, racial equity, and family choice. PFA leverages existing state and federal investments and strengthens the early learning eco-system. It is nuanced work that is difficult to capture in one report.

The Preschool and Early Learning Division (PEL) is committed to building a strong and sustainable program that meets the needs of families and providers. Many of the improvements highlighted in this report are already underway. We appreciate your partnership in this effort and look forward to sharing our progress in the future.

**Recommendation 1**

*Develop and implement a process to verify the accuracy of families' application answers used for priority weighting. At a minimum, the process should verify income with documentation, since income is the highest weighted and is straightforward to document.*

We do not have sufficient time to consider and evaluate this recommendation for inclusion during this application round, which opened on April 2nd. However, PFA is committed to reviewing this recommendation further, including examining best practices and weighing the potential benefits against the associated burden, before making a final determination on next steps.

Requiring verification of application data beyond the eligibility criteria contradicts the principles of universal preschool. The two eligibility requirements for PFA are clearly defined as age and residency within Multnomah County. Documentation to prove PFA eligibility is reviewed and verified when families enroll. Our approach is consistent with other universal preschool programs- verification is tied directly to eligibility. For example, programs that use income as an eligibility requirement for some or all of their seats require income documentation.

We use application data for prioritization when demand exceeds capacity at specific locations. This is different from eligibility, and families' responses do not impact their eligibility. We verify eligibility requirements, but other application details are self-reported. Families complete an attestation of accuracy that is embedded in the application. As we make progress towards universal access in 2030, the gap between capacity and demand is expected to narrow, reducing the need for prioritization.

The addition of further verification requirements may create undue barriers, particularly for priority groups, and significantly slow down the application process. It may also increase administrative burden and cost, requiring the storage of unnecessary sensitive data and an increase in administrative staff.

**Recommendation 2**

*Adjust budgets and the forecast to better reflect actual spending.*

The report highlights underspending in FY24. PEL has been aware of this issue and decreasing underspending was one of key FY25 budget priorities that we shared with the Board of County Commissioners last spring.

Although there is still room for improvement, PEL continues to decrease the rate of underspending every year. Underspending will continue to dramatically decrease in FY25. In the most recent monthly budget period, PEL's budget is 80% spent compared to 50% at the same point in FY24.

Budgeting for a new initiative involves many unknowns. PEL underestimated the amount of planning and capacity building needed to develop and implement new services and contracts. At the same time, we have also worked hard to be thoughtful stewards of Preschool for All dollars. PFA forecasting is updated on a yearly basis and any unspent funds incorporated into future planning. We also update the forecasting assumptions with new data every year.

With two years of implementation data to guide us, the FY25 budget is much more accurate than previous years. We have established key contracts for workforce development and the PFA Facilities Fund. This work is now well underway. Spending in these areas will ramp up significantly as we continue our path to universal preschool in 2030.

### **Recommendation 3**

*Ensure communications to providers, the Board of County Commissioners, and the public reflect current practices and note in a timely manner when changes from the plan and county code have occurred.*

We agree that our communications surrounding operational and/or programmatic changes can be strengthened and accept this recommendation. PEL staff are continually looking for opportunities to improve Preschool for All. This means that there are regular changes that we seek to communicate in advance and after stakeholder input has been received, to the Board, providers, and the public.

We currently provide two annual briefings to the Board of County Commissioners, quarterly community newsletters, monthly provider newsletters, regular provider emails, and a yearly implementation update. In order to ensure that our communications reflect current practices and note changes in a timely, we will:

- Create a document that includes the key elements of the PFA plan and county code and how they have been operationalized. Post this document on the website and share with the Board, providers, and public.
- Create regular, structured opportunities for PEL program staff to document changes
- Incorporate changes into existing communications methods (newsletters, emails, briefings, website updates, etc)
- Use monthly communications meetings with the PEL Director as an accountability check on where changes have been communicated and what additional communication needs to happen.
- Host quarterly meetings with both PFA Advisory Committee and newly forming PFA Provider Advisory Group
- Offer quarterly briefings to Commissioners

### **Recommendation 4**

*Make priority group language consistent across all communications, including contracts, applications, program instructions, and communications to the public.*

We agree that this is a needed change, accept this recommendation, and are in the process of implementing it. It is important that the priority group language is consistent across our communications. We will be doing a thorough review of all of our documents to ensure that the language is clear and the updates are complete.

**Recommendation 5**

*Provide information about the availability of seats at each preschool on the website, to provide more information for families that are applying.*

We accept this recommendation. In previous years from approximately July- January, a PDF has been updated regularly and posted to the home page of our family application showing which sites currently have seats available.

Our application system vendor, BridgeCare, recently released a feature that automates the process of providing information about availability of seats. It is already incorporated into the 2025-26 PFA family application that opened on April 2. The feature identifies where there are "seats available," "low availability," and "no availability" when families conduct a search for PFA preschool sites.

**Recommendation 6**

*Create focused outreach strategies for each of the priority groups in the Preschool for All Plan.*

We will use this recommendation as an opportunity to reflect on outreach to each of the priority groups, to consider new outreach strategies that can be added, and to identify additional organizations that we can partner with for family recruitment.

Our current outreach includes strategies focused on each of our priority groups. PFA has been successful in recruiting families from these groups and there are always additional ways to deepen this work. We add new strategies each year and are interested in continuing to improve our outreach.

One of the most effective ways to reach families in our priority groups is through organizations they trust. We offer opportunities for these organizations to learn more about the PFA family application. We want them to be able to confidently refer families to PFA. We've cultivated relationships with many organizations to do this well. This includes the Oregon Department of Human Services to connect foster families with PFA and the Multnomah Early Childhood Program to connect families who have children with developmental delays and disabilities. Last year, 31 staff from community based and governmental organizations attended our family application information sessions.

This spring we sent PFA postcards to almost 7,000 families on the Oregon Health Plan. We partnered with Health Share to identify eligible children. Each family received a postcard about the PFA family application in their preferred language.

This program year we have also built a presence at community outreach events (along with our FCO partners) that specifically targets our priority populations. Our FCO partners and PEL staff support families with the application process and collect contact information for interested families at these monthly community outreach events.

**Recommendation 7**

*Add more training on culturally responsive and accessible preschool.*

We agree with this recommendation and are creating additional training opportunities this year. Teachers and assistants that work in state licensed childcare facilities are required to have minimum training hours in these subject areas. PFA is building upon that core knowledge that we expect all PFA providers to have.

PFA has offered training and will continue to offer courses connected to equity, cultural responsiveness, and inclusion. The following trainings will be offered for this spring and upcoming fiscal year:

- Foundation of Anti-Bias Education
- Equity Empowerment
- Recommitting to Anti-Bias Education with the Threads of Justice Collective
- Antibias Preschool Tools and Practices
- Culturally Responsive Preschool Systems
- Trauma-Informed and Strengths-Based Practices

### **Recommendation 8**

*Provide instructions to family navigator organizations, encouraging them to visit and get to know at least some preschools.*

We accept this recommendation. Starting in summer 2025, we will invite Family Navigator partners to preschool site visits. This will give them additional information to share with families about the different types of preschool settings in our mixed delivery system.

### **Recommendation 9**

*Add the provider program guide to the website.*

We agree with the recommendation to create more transparency for interested providers. We have been working this year to develop a [provider resources page](#) for the website. The page is live and includes the program guide, a sample contract, key PFA policies, and resources. We will continue to add more to the page as we get new questions and requests from providers.

### **Recommendation 10**

*Create a system to improve data tracking of all preschools that have applied, the outcome, and the reason for the outcome.*

We accept this recommendation and have already begun taking steps to make significant improvements to our data tracking process. The preschool application and allocation workflow has been refined to assure consistent documentation throughout the process.

In addition, we will be working on a process to identify a customer relationship management (CRM) system that will organize information about prospective and current preschool providers. We are planning for the CRM to hold data about provider application and qualification, seat allocation, reporting, and contract monitoring.

### **Recommendation 11**

*Create and implement a process for engaging with preschools that have applied but did not participate.*

We accept this recommendation. Expanding the number of PFA providers by engaging preschools who have demonstrated interest by applying but chose or were not able to participate has been a top priority for the program's pilot phase.

PFA's FY26 submitted budget included a new Preschool Partnerships Coordinator. Part of that new role will be to create and implement improvements to PFA's current provider application process, including connecting with and supporting interested providers. This will include:

- Outreach and communication prior to the application process
- Invitations to information sessions
- Communication about changes to PFA requirements
- Updates to the website and frequently asked questions
- Data tracking, including why providers choose not to participate in PFA
- Gathering feedback from providers to inform future program improvements

#### **Recommendation 12**

*Create and implement a formalized mechanism for preschools of various sizes (both participating and not participating) to provide input on the Preschool for All program.*

We accept this recommendation. PFA agrees that there needs to be a formal way for providers to give feedback about Preschool for All. We are currently developing a PFA Provider Advisory Group. The application for interested providers to join the advisory group will open in mid-April. That group will include current PFA providers and providers who are not participating in the program. Group members will include small and large preschool providers.

PEL will use the group's ideas and suggestions to inform changes to Preschool for All. The group will support PFA's efforts to meet the needs of preschools across the community. This will create a stronger and more equitable early learning system grounded in the investments our community made through Preschool for All.

#### **Recommendation 13**

*Work with central purchasing and the county attorney to review contract requirements for opportunities to reduce burdens on preschools, while still protecting the county. Consult with the county equity contracting group as a resource.*

We accept this recommendation. Our team is always looking to reduce barriers for providers while ensuring that children and families have positive PFA experiences. Central Purchasing and the County Attorney's Office have been great partners to PFA. We appreciate their openness to discussing potential changes. Provider contracts for 2025-26 include updates to the intellectual property clause to address provider concerns. PEL also worked with Central Purchasing this year to adapt the procurement process for currently contracted providers. This change will reduce the administrative burden for providers.

We are working to schedule a meeting with the equity contracting group. We look forward to learning more about how we can leverage their expertise.

#### **Recommendation 14**

*Publicly report annually on the progress of the facilities fund. Include updated analysis on the estimated number and capacity of existing private and public preschools, as available data allows.*

We accept this recommendation. We agree that this data is essential to report and plan to share yearly updates on the progress of the facilities fund, beginning with the April 2025 PFA Board briefing. PEL will include updated analysis on publicly funded seats and private-pay seats in the community as that data is available.

**Recommendation 15**

*Specify and communicate facility fund guidelines to include requirements for creating Preschool for All seats specifically.*

We accept this recommendation. Our current review process includes ensuring that the amount of PFA grant funding is aligned with the number of intended PFA seats that the project will create. The numbers below reflect the expected number of PFA seats based on funding levels. These are based on \$25,000 per new PFA seat:

- Projects that receive \$1M for new center development should create 40 or more PFA seats
- Projects that receive \$750,000 for new center development should create 30 or more PFA seats
- Projects that receive \$500,000 for new center development should create 20 or more PFA seats

PEL may consider exceptions to these numbers, such as when the project is happening in multiple stages (and the number of PFA seats is expected to grow over time), when the project is located in a high-needs area, when the project also benefits other publicly funded preschool seats, or it is a program that meets an identified strong community need.

We are working with our partners at BuildUp Oregon to include these expectations in the updated program guidelines.

**Recommendation 16**

*Adjust reporting requirements for academic navigators to better monitor if the investments are building new teacher capacity.*

We accept this recommendation. It's important that the reporting for PFA's workforce development efforts help us understand both the short and long term effects of these investments. This includes post graduation metrics. We are currently working with our partners to update our requirements and ensure that they gather post graduation data.

Sincerely,

A handwritten signature in black ink that reads "Jessica Vega Pederson". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Jessica Vega Pederson  
Multnomah County Chair