

**National Association for the Education of Young Children**

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January 21, 2016

The Honorable John King  
Acting Secretary  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, D.C. 20202

***Request for Information: Implementing Programs under Title I of the Elementary and Secondary Education Act***

Dear Acting Secretary King:

The National Association for the Education of Young Children (NAEYC) appreciates the opportunity to provide comments regarding the U.S. Department of Education's Request for Information on the implementation of the Every Student Succeeds Act (ESSA). NAEYC celebrated ESSA's elevated focus on the importance of the early years to long-term student success and is pleased to be able to provide these comments to help inform forthcoming regulations and guidance from the Department, focused on our shared priorities of (1) promoting equity and excellence and (2) lifting up the teaching profession.

**PROMOTING EQUITY AND EXCELLENCE**

**Promote developmentally appropriate practice in teaching, learning and assessment for all children.**

NAEYC's Strategic Direction identifies five critical goals that define the work of our organization; the first of these is that "children birth through age 8 have equitable access to developmentally-appropriate, high-quality early learning." We believe the Department shares this goal and we strongly encourage you to intentionally and actively support learning environments that take into account children's developmental, individual and socio-cultural needs and strengths by embedding the language and tenets of [developmentally-appropriate practice \(DAP\)](#) into guidance and regulations as they relate to early learning for children birth through third grade. This focus on developmentally appropriate practice, in which teaching is grounded in the best practices and research on how children learn and develop, should be embedded in all aspects of ESSA's implementation in the early years and grades, from professional development and teacher evaluation to standards and assessment. The Department can play a critical role in ensuring that states, districts and schools recognize that academic rigor and developmentally-appropriate practice can and do exist side-by-side, in grades K-3 as much as in the preschool years, and that teachers' ability to implement developmentally-appropriate practice to help children succeed is supported, assessed and addressed.

**Encourage the use of Title I funds for early learning programs that meet high quality standards.**

Specifically, we encourage the Department to develop regulations that clarify states' responsibilities to support LEA's use of Title I dollars for early education. These regulations should also encourage LEAs to use Title I funds for early learning programs and the regulations and guidance should demonstrate how LEAs can incorporate developmentally-appropriate practice and prioritize equity and mixed-delivery systems in their implementation.

**Ensure alignment between early childhood indicators of quality and indicators of school quality in K-3.**

Within the framework of developmentally-appropriate practice that is also culturally and linguistically relevant, we encourage the Department to develop regulations and/or guidance related to the accountability indicators in the early grades, including additional information regarding what “indicators of school quality or school success” can look like and what “greater weight” means related specifically to academic indicators. We encourage the Department to require SEAs and LEAs to promote alignment with existing indicators of quality that have been incorporated into early childhood systems in states and communities, such as CLASS, QRIS, ECERS and [NAEYC program standards](#).

**Strengthen connections to Head Start.**

It will also be very important for the Department to clearly regulate how SEAs and LEAs must meet the law’s requirements regarding alignment and coordination with Head Start, particularly as it concerns reciprocal MOUs and the attainment of Head Start Performance Standards across all early learning programs funded with Title I dollars.

**Support equity goals through data collection for children birth to five.**

Finally, because we believe that one of the most important things we can do in these initial stages of implementation is ensure that ESSA continues to build on its critical nature as a civil rights law, we encourage the Department to provide regulations that support and enhance the data gathering and sharing required in the law, with disaggregation that shines a light on equity and equality. ESSA requires states to report on the number and percentage of students enrolled in preschool. We stand in agreement with partner organizations who call for regulations broadly defining preschool to include 0-3 programs, regardless of funding source, so that states are required to report on the participation of students and families across multiple settings and sectors, beginning at birth and disaggregated by race, disability, English-language learner status, and family income. In addition, we support efforts to ensure that students are not served at disproportionate rates by ineffective, out-of-field or inexperienced teachers, and encourage the Department to use state plans and allow states to include students with disabilities, English language learners and rural students in the process of assessing and addressing disproportionality in access to quality.

**LIFTING UP THE TEACHING PROFESSION**

**Improve transitions between early childhood programs and early elementary schools.**

Because we know that educators are the linchpin of quality, and because we are an organization committed to advancing a diverse, dynamic early childhood profession, the second goal within NAEYC’s Strategic Direction is that “the early childhood profession exemplifies excellence and is recognized as vital and performing a critical role in society.” With a shared focus on educators, we hope the Department will prioritize regulations and guidance regarding the law’s requirements for coordination and transition that connects early childhood and grades K-3. We strongly encourage the Department to provide guidance and use the opportunities provided by state plans to intentionally lift up and emphasize the need for professional development that promotes alignment and increases knowledge of child development, meaningful family engagement strategies, and developmentally-appropriate practice among principals, school leaders and K-3 educators. Teachers’ ability to create and sustain successful and effective early learning environments depends greatly on the understanding of and commitment to best practices from the instructional leaders in their programs, schools, districts and states; ensuring teachers of young children are supported to do what is right for these children and their families should be both an immediate and ongoing priority.

**Promote developmentally appropriate literacy instruction for children beginning at birth.**

Under the new law, educators will have the continued opportunity to focus on children’s literacy development and achievement, albeit under a new program and framework. While state flexibility is supported in the context of the law, regulations from the Department that reiterate the expectation and opportunity to promote literacy development beginning at birth will be welcome, as will information that clarifies the meaning of evidence-based programming and evaluations, particularly as it concerns the early years and the racial and ethnic diversity of children, families and communities.

**Implement the new Preschool Development Grant program.**

Finally, while early learning language was expertly woven throughout the bill, the Preschool Development Grant program remains the most obvious example of how Congress intended the law to support states and communities in planning, coordinating and expanding their early childhood programs for low-income children. We know the Department of Education will be working very closely with the Department of Health and Human Services in the implementation of this section of the law, and we look forward to additional guidance and funding announcements that support states in increasing children’s access to high-quality early learning that is led by strong and effective early childhood educators. We strongly recommend that the two Departments work to ensure continuity for the current grantees and that the new competition focus on helping states implement high quality programs and prioritize new services to underserved communities.

We thank you for the opportunity to provide these initial recommendations, and look forward to working with the Department and states across the country to ensure that this law lives up to its name, helping every teacher, every family and every student succeed.

Sincerely,

A handwritten signature in cursive script that reads "Rhian Evans Allvin".

Rhian Evans Allvin  
Executive Director, NAEYC