

National Association for the Education of Young Children

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October 14, 2015

The Honorable Lamar Alexander
Chairman, Senate Committee on
Health, Education, Labor and Pensions
United States Senate
Washington, D.C. 20510

The Honorable John Kline
Chairman, House Committee on
Education and the Workforce
United States House of Representatives
Washington, D.C. 20510

The Honorable Patty Murray
Ranking Member, Senate Committee on
Health, Education, Labor and Pensions
United States Senate
Washington, D.C. 20510

The Honorable Bobby Scott
Ranking Member, House Committee on
Education and the Workforce
United States House of Representatives
Washington, D.C. 20510

Dear Chairman Alexander and Ranking Member Murray, Chairman Kline and Ranking Member Scott:

Thank you for the opportunity to provide our recommendations on the reauthorization of the Higher Education Act (HEA). The reauthorization of HEA presents an important opportunity to support a strong early childhood education workforce that sets our nation's young children on a path to success. High quality early childhood education is critical to closing achievement gaps, preparing students for success, and building America's prosperity.

The National Association for the Education of Young Children (NAEYC) promotes high-quality early learning for all children, birth through age 8, by connecting practice, policy, and research. We advance a diverse, dynamic early childhood profession and support all who care for, educate and work on behalf of young children.

Our nation's higher education institutions and systems have a profound impact on the preparation of our early childhood educators, who are critically important in our collective ability to achieve the high-quality early learning systems that we all want. In particular, HEA plays an important role by:

1. Supporting those pursuing early childhood education credentials and degrees using federal financial aid and other federal benefits; and also providing support for some low-income students who need high quality childcare in order to pursue and complete postsecondary credentials and degrees.
2. Supporting the improvement of educator and leader preparation programs through Teacher Quality Partnership Grants and other Title II provisions, and
3. Supporting the identification of quality educator preparation programs through multiple measures of program productivity and quality.

A reauthorized law should:

1. Further strengthen student aid and include early childhood educators to the maximum extent possible in federal student aid benefits, while ensuring that students with their own children can afford to efficiently and effectively complete degrees and credentials.
2. Further support improving the quality of educator and leader preparation programs, expanding early childhood educators' access to these programs wherever possible, and advancing the quality and consistency of early childhood education State licensure systems and career advancement pathways.
3. Ensure that any accreditation reforms in the law preserve the accreditation of early childhood educator preparation programs and create a cohesive process for accreditation that maintains high standards across geographic boundaries.

NAEYC offers the following specific recommendations to ensure that HEA helps improve the quality and stability of the early childhood education workforce across our nation.

Improving the Clarity, Accessibility and Effectiveness of Federal Student Aid

Federal student aid helps current and prospective early childhood educators afford postsecondary education programs that yield important credentials in their field. This is particularly valuable since early childhood educators are often compensated at a salary level that renders them eligible for child care assistance for their own children, and thus they rely on financial assistance to complete postsecondary degree programs. Even faced with challenges of affordability and accessibility, however, early childhood educators and administrators are increasingly obtaining postsecondary degrees, because they know it is an important step towards gaining the necessary knowledge and skills needed to develop and maintain high quality early childhood education programs and systems.

Federal law currently provides for Pell Grants, the federal student loan program, multiple student loan forgiveness programs, and TEACH Grants, among the supports that early childhood educators can potentially access. Early childhood education is also considered an area of national need under the Section 428K of the Higher Education Act providing for loan forgiveness for employment in areas of national need – although this program has not been funded. Each loan-related program comes with differing repayment, forgiveness or loan cancellation criteria, differing eligible populations, and differing financial benefits that current and future educators must weigh.

We ask that a reauthorized law make benefits for early childhood educators as clear and robust as possible through the following:

- **Improve loan forgiveness and loan cancellation for early childhood educators.**
These sources of benefits and aid can encourage high quality educators to enter the early childhood field, making a postsecondary degree more affordable at a time when the quality of the early childhood workforce is more critical than ever.
- **Ensure that options for loan forgiveness programs and other financial aid are flexible, easy to understand, and robust enough to meet the needs of current and prospective early childhood educators.**
Many students pursuing early childhood education credentials are working students with families of their own, and they often do not make competitive salaries. Robust

federal aid with realistic and understandable requirements is key to attracting and keeping quality candidates and educators in this critical field.

- **In particular, fund the public service loan forgiveness program for Areas of National Need (Section 428K of current law) or provide loan forgiveness after 5 years for early childhood educators and other individuals employed in areas of national need under the Public Service Loan Forgiveness program (Section 455 (m) of current law).**
Early childhood educators and others who pursue public service in areas of national need often struggle financially due to salary levels. Making 120 on time payments over the course of 10 years is a challenge under current public service loan forgiveness and often not a robust enough incentive to attract strong candidates into the field. The Higher Education Act should make it easier to pay back student loans for this critical part of the workforce. Therefore we recommend a more robust incentive whether through a funded Areas of National Need Loan Forgiveness program, an amended Public Service Loan Forgiveness Program, or another policy alternative.
- **Clarify that all early childhood educators are eligible for these benefits.**
Current policy is set such that only early childhood educators in elementary school settings are eligible for certain loan forgiveness and cancellation programs, although families across the country choose to enroll their children in a range of early childhood education settings to meet their needs and find the right place for their children. In order to even the playing field, we encourage Congress to include early childhood educators across the spectrum of settings (including licensed and regulated child care programs and Head Start programs) in any loan forgiveness and cancellation programs that include early childhood education.
- **Reinstate Year Round Pell Grants.**
Because early childhood educators are often working while they are in school – frequently in community colleges which provide year-round academic offerings – year round Pell Grants (which were eliminated in FY 2012) are an important tool for completing valuable degrees more quickly to enhance their teaching skills, limit debt burden, and advance their careers regardless of the time of year.
- **Expand the CCAMPIS program.**
This program allows low-income students who are also parents to receive support to pay for child care. Because of their student status, these individuals may not qualify for other child care assistance programs, but, like all parents, need to know their children are receiving high-quality early care and education while they focus on their own educational access and completion.
- **Reinstate and amend the Perkins Loan Program and Loan Cancellation for early childhood educators.**
The Perkins Loan Program provides an important and unique loan cancellation option for students pursuing early childhood education in elementary school settings serving low-income students – where they are both greatly needed, and drastically underpaid. The Perkins Loan Program authorization has expired as of September 2015. We recommend the reauthorization of this program, and we recommend expanding eligibility for loan cancellation to all early childhood educators serving low-income students, not only those who work in elementary school or Education Service Agency settings.

- **Maintain the Community Service Work-Study priority for early childhood education activities, and increase the percentage of federal work study funds that institutions dedicate to community service-based work-study programs.**
- **Amend the TEACH Grant program to limit eligibility for the program to juniors, seniors and master's degree students to improve the likelihood of TEACH recipients completing their preparation and the required teaching service component.**

The TEACH grant has provided critical support to students preparing to teach in high-need fields and high-need schools, and in this case, limiting eligibility will increase the likelihood of success. We also recommend that the payback requirement be proportional to the teaching service that TEACH recipients have completed. Currently, TEACH recipients must pay back the full amount of their TEACH grant regardless of whether they have partially fulfilled their teaching service obligation.

Improving the Quality and Accessibility of Title II Educator and Leader Preparation Programs

Teacher Quality Partnership Grants

As the federal government's signature investment in educator preparation, the Teacher Quality Partnership (TQP) grant program is critical to strengthening the nation's educator pipeline and is having a tremendous impact in high-need communities. The program's focus on extensive clinical preparation, preparing all educators to work with students with disabilities, preparing educators to work with diverse learners, building partnerships between higher education institutions and high-need local educational agencies and schools, and requiring teacher candidates in these programs to commit to teaching for three years in high-need communities is a model for preparation programs across the country. Indeed, many institutions across the country have incorporated the components of the TQP program within their preparation programs. In particular, the TQP Grants, and the partnerships encouraged through these grants, are an important component of the law that help to foster better connections between early childhood education preparation programs and early childhood education settings.

The quality of educator and leader preparation programs is critical to the success of early childhood educators and program directors. As such, **we encourage a reauthorized law to continue to increase the focus on quality, while also ensuring that programs under these grants are open to prospective or current early childhood educators through the following:**

- **Maintain Title II Teacher Quality Partnership (TQP) grants, and include early childhood educators consistently in educator preparation initiatives** under Title II, including residency programs, clinical experience and interaction, induction programs, and leadership programs.
 - Congress should include language that ensures that partnership initiatives include early childhood educators in teacher preparation initiatives, and only allows them to opt out of doing so upon providing a specific rationale.
 - Language stating that early childhood educators and early childhood education programs are included in these teacher preparation initiatives "as appropriate" should be removed.
- Recognize the full spectrum of early childhood education by **clarifying that participants in educator residency and induction programs may be placed in licensed and regulated child care settings and Head Start programs**, in addition to school settings, under Teacher Quality Partnership Grants.

- **Maintain a continued focus on degree attainment and high quality educators through educator compensation programs, as currently included in Title II, Sec. 202 (d)(4).**
This section ensures that Teacher Quality Partnership Grants are used in part to implement initiatives that incentivize early childhood educators to attain an Associate's or Bachelor's degree through increased compensation.
- Implement incentives or other policies to ensure that institutions of higher education and their programs – particularly educator and leader preparation programs - are **providing the supports needed to ensure both access and completion**. We also encourage Congress to **support much needed innovations and research in this area**. Early childhood educators, like all students, should receive the supports and structures they need from colleges to successfully earn degrees. Too many are unable to finish degree programs under the current structures of higher education institutions, leaving gaps in quality in the early childhood education field.
- **Improve definitions in Title II to best reflect the unique needs of early childhood education programs, including:**
 - **Amend the definition of an "Early Childhood Educator"** to an "individual whose primary responsibility is supporting the education of children in an early childhood education program" to ensure that master and lead teachers, coaches, and classroom aides can also benefit and grow in their careers from Title II-funded programs.
 - **Amend part (C) of the definition of an "Early Childhood Program"** to include programs serving children through the "age of school entry", rather than through the age of 6 – to better reflect state laws and program realities on the ground.
 - **Amend the definition of a "High-Need Early Childhood Education Program"** to better reflect geographic boundaries of early childhood education programs by replacing the requirement that the program be "located within the geographic area served by a high-need local educational agency" with an alternate metric of the high concentration of poverty in the population served by the program (e.g. % of low-income families served by the program).
 - Early childhood education programs serving high concentrations of low-income families do not fit neatly into the geographic areas bounded by local educational agencies, and these boundaries may exclude important programs serving high poverty areas.

Title II Programs of National Significance for early childhood workforce preparation and advancement

The 2015 Institute of Medicine report, "Transforming the Workforce for Children Birth through Age 8" emphasizes the importance of higher education and professional learning – particularly pathways to credentials – to dramatically improving the quality of the early childhood education workforce.¹ We encourage Congress to leverage the reauthorization of the Higher Education Act to implement the research-based recommendations of this report and help meet the critical need for high quality early childhood educators across all program settings, communities, and states.

¹ Institute of Medicine (IOM) and National Research Council (NRC). 2015. *Transforming the workforce for children birth through age 8: A unifying foundation*. p. 10-22 – 10-25. Washington, DC: The National Academies Press.

Specifically, the report recommends that technical assistance, such as federally funded technical assistance, clearinghouses, and quality assurance systems, focus on better coordinating professional learning systems, including higher education preparation programs. The report also states that professional learning systems should be guided in part by the alignment between children's developmental needs and educators' needs in meeting core competencies and professional practice standards. There is work to be done to identify commonalities and best practices in those core competencies and professional practice standards, which the Higher Education Act could wisely support.

Therefore, based on this report, we recommend that a reauthorized law:

- **Create federal programs of national significance and create federal technical assistance authority as a set-aside under Title II Teacher Quality Partnership Grants, supported by an overall increase in appropriations.**

States and communities are seeking ways to build career advancement pathways and professional learning systems based on competencies, as opposed to those based only on educational attainment (i.e., certificate, associate's degree, and bachelor's degree). Early childhood educators and prospective early childhood educators also face the challenge of different competencies for licensure required depending on their locality or state. With an overall increase in appropriations for the Teacher Quality Partnership Grants, which would allow for a new set-aside, the federal government and national experts could help address this challenge and improve quality across the field and the nation through:

- **National demonstration authority:** HEA requires reporting on state licensure and preparation requirements, but the federal government and national experts should be partners in helping states better align and raise the quality of pathways and licensure and preparation requirements. We recommend that HEA **authorize national demonstration funding to help identify important early childhood educator competencies – based on research and evidence** – to inform state licensure requirements and high quality preparation and career pathways programs. Such work could be done through a competitive national grant to a non-profit or other research entity. The federal government has a clear role to play in advancing the overall quality of the field in this respect.
- **Technical assistance authority:** Create federal technical assistance authority and funding under Title II Teacher Quality Partnership Grants, and include as an allowable use the following:
 - Provide TA funds to a national nonprofit or research entity to assist states and teacher preparation partnerships to better align and elevate quality early childhood educator licensure systems and pathways.
- **Provide incentives for institutions of higher education to create clear, aligned, and high quality postsecondary pathways into early childhood education careers**, so that more individuals earn credentials and degrees in early childhood education and pursue careers in this area, whether through the current First in the World grant program or other incentives for innovation.

Teacher preparation program quality determinations

As Congress considers changes to the accountability provisions in Title II, Section 205 of the Higher Education Act, we recommend that:

- **The statute clarify that all educator preparation entities that receive funds from the federal government and/or that have students who receive funding through Title IV, HEA programs must submit institutional and program report cards on program quality.** In addition, states must report on all educator preparation programs that receive federal funding and/or have students who receive funding through Title IV, HEA programs.
- **The accountability provisions be streamlined** to require institutions and states to report on measures of productivity and quality that **provide meaningful data that is directly related to the level of preparation received by teacher candidates.** These may include results on state licensure exams and candidates' performance-based assessments, faculty observations from the clinical component of preparation programs, and program outcome data as appropriate and available, and which takes into account the realities of the early childhood field and the length of time needed for nontraditional students and part-time candidates to attain degrees.
- **The provisions requiring states to identify low-performing institutions be strengthened** so that states must provide technical assistance to those programs and also close programs that do not improve through technical assistance. In addition, states should be required to report on all programs that have closed, and identify the reasons and rationales behind those closures.

Finally, **we have strong reservations about any potential proposals to determine the quality of early childhood educator preparation programs based on child test scores (such as value-added measures).**

Both the American Statistical Association and the American Educational Research Association have raised significant concerns about using value-added measures to determine the effectiveness of teachers and teacher preparation programs. In addition, the Institute of Medicine report on "Transforming the Workforce" clearly reminds us that using assessments for high stakes purposes among young children is not good practice, nor good policy – and provides recommended alternatives that we can focus on to assess and reflect on improvements and accountability in early childhood educator preparation.²

Preserving and Strengthening Accreditation as a Quality Improvement System

Program accreditation is an important process within the broader context of accreditation of institutions of higher education. Accredited programs strengthen returns on investment for students, have public recognition that helps students select quality degrees and credentials, allow prospective employers to identify quality preparation, and provide evidence of student performance in relation to professional preparation standards.

² Institute of Medicine (IOM) and National Research Council (NRC). 2015. *Transforming the workforce for children birth through age 8: A unifying foundation*. p. 10-22 – 10-25. Washington, DC: The National Academies Press.

In addition to accrediting early childhood education programs that serve young children, NAEYC also accredits and recognizes degree programs preparing early childhood professionals. NAEYC recognizes high-quality early childhood baccalaureate and graduate degree programs at colleges and universities through a partnership with the Council for the Accreditation of Educator Preparation (CAEP) and directly accredits associate degree programs through the NAEYC Commission on Early Childhood Associate Degree Accreditation. NAEYC faculty peer reviewers and Commissioners evaluate evidence from programs to determine whether programs meet the NAEYC Professional Preparation Standards, a broad set of national competencies for the early childhood profession.

NAEYC and other programmatic accreditors create standards specifically focused on the quality of the degree program and hold programs accountable for meeting those standards by examining program outcomes and the competencies gained by the participants rather than at a static set of inputs. Currently, there are approximately 256 institutions with NAEYC recognized baccalaureate and graduate degree programs in 37 states/territories, and 2 international recognized programs. At the associate degree level, there are 180 institutions in 34 states with programs accredited by the Commission on Early Childhood Associate Degree Accreditation.

As changes to the accreditation of institutions of higher education are contemplated, we urge Congress to **preserve the accreditation of early childhood educator preparation programs, including its unique role as a quality improvement system.** Program accreditation creates a shared professional identity and improves professional practice. In addition, we offer the following recommendations:

- **Preserve and clearly recognize the distinction between institutional accreditation and program accreditation** in any reforms to the law, and **preserve the accreditation of early childhood educator preparation programs;**
- **Take lessons from some of the positive aspects of program accreditation,** such as a focus on partnerships between two- and four-year institutions and with community programs, competencies, and outcomes metrics;
- **Ensure that any new accountability processes do not make accreditation more burdensome for institutions and accrediting agencies than the current system;**
- **Ensure consistent definitions of quality across the system.** Accreditation should serve as a symbol of quality across state lines for students, employers, and other institutions;
- **Ensure that any required or suggested metrics on program or institutional quality, such as debt-to-income ratios or other employment and earnings metrics, account for programs that prepare students for careers in low-wage but high need, high value professions, such as early learning.** We need institutions to continue to see the value in early childhood education preparation programs and continue to improve the quality of these programs, regardless of their graduates' salaries. At the same time, we hope a reauthorization will be cognizant of, supportive of and integrated with efforts to improve the compensation of early childhood educators across settings.

Thank you for your consideration of these recommendations and for your important work to reauthorize the Higher Education Act. We look forward to further discussion on these issues, and we are available to provide further information or answer any questions you may have.

Sincerely,

A handwritten signature in purple ink, appearing to read "Rhian Evans Allvin", with a long, sweeping underline.

Rhian Evans Allvin
Executive Director