

May 25, 2016

Secretary John King
U.S. Department of Education
Washington, D.C. 20202

Dear Secretary John King,

We are writing to offer input on ways to expand early learning in areas of the Every Student Succeeds Act (ESSA) on which the Department of Education could provide non-regulatory guidance to assist states, districts and other grantees in understanding and implementing the new law. The Grow America Stronger campaign is a coalition of early childhood advocates dedicated to making high-quality early childhood education a national priority and advancing greater federal investments. With respect to the need for guidance within Title I, we refer the Department to comments that were submitted by individual organizations that are part of the Grow America Stronger campaign. This letter restates a few of the Title I priorities, while also addressing additional provisions of the law that would benefit from targeted guidance to support the work of states and districts related to early learning.

The Elementary and Secondary Elementary Act (ESEA) previously included early learning as an allowable use of funds; the Every Student Succeeds Act (ESSA) takes the allowable use of funds a step further by explicitly naming early learning as an area for states, districts and other grantees to further their commitment to developing and expanding high quality early learning opportunities for their families. Ensuring that children can access a high-quality continuum of care and learning from birth through third grade is the best strategy to improve education, health and economic outcomes for children. ESSA's provisions highlight opportunities promoting early learning coordination within communities; supporting greater alignment and the early elementary grades; encouraging greater engagement between schools and families, and supporting early childhood education focused capacity building among teachers, leaders, and other staff serving young children. The law as a whole aims to prepare students for college and career readiness. Decades of research has established the importance of learning in the early years, when children's brains are rapidly developing, and ensuring children have access to high-quality early learning is critical to creating a strong foundation upon which all subsequent learning will follow. With the renewed charge to invest in high-quality early learning in ESSA, state and local leaders who have previously focused primarily on supporting K-12 will benefit from additional clarification. Through targeted guidance, the Department can support state and

local understanding of the intention of the law in order to optimize the expansion of early learning opportunities for families that require the greatest support.

The Grow America Stronger campaign intends for the comments below to highlight and expand areas throughout the law where guidance would assist states and districts in better understanding how to most effectively use the law to promote quality and integrate early childhood into the K-3rd continuum. Guidance will also support state and local decision-making efforts to expand access to children from low- and moderate-income families that are not already receiving services or have been underserved.

We seek non-regulatory, evidence-based guidance and examples for the following provisions of the law:

Ensure Stakeholder Engagement is Inclusive of Diverse Early Childhood Educators and Experts

Effectively promoting equitable access to high quality early learning will depend in part on states' and districts' abilities to engage a diverse group of early childhood educators and experts in the development and implementation of their ESSA implementation plans. As with Title I, Title II and Title IV, state applications for funding require meaningful consultation with stakeholders, and consultation in developing local applications is also required. In light of this, we believe stakeholder engagement is one of the most pressing areas of the law and therefore requires guidance from the Department. We strongly encourage the issuance of guidance that addresses the creation of state and local structures and processes for engagement. In addition, the guidance should emphasize, specifically and explicitly, including a diverse group of educators who draw upon expertise spanning early childhood development, including various settings and sectors.

ESSA also requires State educational agencies (SEAs) to consult with other state stakeholders, including agencies responsible for administering early childhood education programs and services, upon receipt of a Literacy for All, Results for the Nation (LEARN) grant under Title II. Guidance in this area would be useful in order to empower early childhood education stakeholders to meaningfully engage in determining how local funds are used for early literacy focused professional development and training.

Clarify and Elevate Professional Development & Principal Support and Training

States and districts interested in building early learning capacity can use Title II funding to engage in meaningful professional development strategies. Guidance related to the types of

professional development (PD) and PD systems that can support high-quality training and delivery will enable early learning PD to be prioritized. The early childhood field has long called for joint professional development in states and districts; the explicit inclusion in ESSA is a tremendous step forward. We now encourage the Department to develop guidance that clarifies the breadth of this provision and provides best practice examples of how joint professional development is structured and supported across grades, sectors and settings, including community-based settings. Guidance should also emphasize the need for ongoing – not one-off – professional development activities. These activities should focus on alignment from birth through third grade, increase knowledge of child development across domains, foster meaningful family engagement strategies and promote developmentally-appropriate practice.

- States interested in using Title II resources to build early learning capacity could consider using the Title II state set-aside, including the new 3% set aside for leaders, to support joint professional development, which is consistent with early learning best practices, for Pre-K through Third Grade educators and school leaders.
- At the district level, Title II funds could be used to provide early childhood professional development opportunities for elementary principals, school leaders and educators, in addition to training that addresses students’ needs and school readiness in their transition to the Kindergarten through 3rd grade years.
- We encourage the Department to develop guidance around state prioritization of school leadership in their spending of the three percent set-aside for statewide professional development activities. Creating the PD programs, trainings, and materials for principals and other school leaders are crucial to student and school success. Guidance should support principals in tailoring their instructional leadership in ways that promote the learning of young children.

Enhance Coordination and Alignment of Early Learning and Kindergarten through Grade Three Programs

Building off the existing federal investments in early childhood under ESEA, ESSA articulates opportunities for states and districts to expand and enhance early learning and improve coordination and alignment of early learning programs from birth through third grade across Titles I, II, III and IV. Additionally, states could use this opportunity to improve coordination amongst the various early childhood programs that makeup the existing mixed delivery system. Departmental Guidance that identifies and elevates these opportunities is critical in order to ensure states and districts are aware of, and supported in, their efforts to prioritize high-quality early learning starting at birth. We note that Title I requires states to support LEAs who choose

to prioritize early learning investments. As other Titles also allow districts to use funds in this way, we encourage the Department to develop guidance that helps states understand their role in supporting early learning across the various Titles. We recommend developing guidance that specifically elaborates on some of the following opportunities and provisions in the law:

- Within Title I, guidance should clarify the many opportunities related to embedding early learning namely:
 - The development and approval of state and district plans; ○ Addressing transition and Pre-K through 3rd grade alignment; ○ Promoting the appropriate use of behavioral and developmental screening of young children to identify possible delays or concerns, ensuring appropriate supports and interventions, including family support;
 - Ensuring early childhood programs funded through Title I meet all Head Start standards; ○ Ensuring SEAs LEAs use developmentally-appropriate and culturally-relevant assessments solely as a tool for improving academic achievement of the disadvantaged, and not as an accountability tool; and
 - Using early learning as a core school turnaround strategy under the school improvement provisions.
- In addition, Title I guidance in the following areas should also be considered:
 - New requirements as part of the McKinney-Vento Act to serve homeless children in state and local preschool programs requires that the responsibilities of state and local liaisons to be clarified.
 - As states and local communities identify schools in need of improvement, guidance should encourage the inclusion of community-based early learning programs and other supports for young children in the required needs assessment.
- Within Title II, guidance should highlight the opportunity for states to use direct funding and leverage the early learning focus of the LEARN program. This early investment in children's literacy development will positively impact progress and success in literacy and other areas of learning.
- Within Title III, guidance should address serving the growing population of English / Dual language learners through the National Professional Development Program by supporting preschool teachers to effectively teach English language learners in their

earliest years of school.

- Within Title IV, the Student Support and Academic Enrichment Grant (SSAEG) Program should be used by states and districts to support Pre-K programs. Specifically, SSAEG could be used to fund the inclusion of early learning as a focus area in the program's mandatory needs assessment. SSAEG could also be used to fund developmentally appropriate early learning projects aligned with SSAEG's well-rounded educational components, such as STEM, music, cultural competency, language, social and emotional development and other enrichment activities beneficial to young learners.
- Similar to other public schools, charter schools and charter management organizations, should use federal funds, including those available through ESSA's Charter Schools Program within Title IV, to support well designed early learning initiatives. Charters interested in creating or strengthening their early learning programs could develop educators' effectiveness, instructional tools, learning environments, data-driven improvements, family engagement, continuity and pathways, cross-sector work, and administration in early learning.
- Within Title IV, guidance should reiterate the opportunity to use Promise Neighborhoods grants to invest deeply in early childhood and family engagement to start a pipeline that supports children throughout the early years and beyond.

Thank you for the opportunity to provide feedback that will inform Departmental guidance in state and local implementation of ESSA. These recommendations should be read with the understanding that some organizations within the Grow America Stronger campaign support additional or varied policy positions. The coalition looks forward to working with the Department as it continues implementation efforts that include improving access to high-quality early learning and development opportunities for children. Though not specifically addressed in this letter, the Grow America Stronger campaign also looks forward to working with the Department on the forthcoming transition and implementation of the Preschool Development Grants Program.

Sincerely,

First Five Years Fund
National Association of State Boards of Education
Save the Children

Child Care Aware of America
National Association for Family Child Care
National Association for the Education of Young Children
Save the Children Action Network
National Women's Law Center
Early Care and Education Consortium
First Focus
New America's Early & Elementary Education Policy Program
National Association of Elementary School Principals
Center for Law and Social Policy
Partnership for 21st Century Learning
Common Sense Kids Action
Build Initiative
ZERO TO THREE
National Parent Teacher Association

Advocates for Children of New Jersey
Alabama School Readiness Alliance
Arkansas Advocates for Children and Families
Center for Children's Initiatives from New York
Children Now
Children's Action Alliance
Children's Advocacy Alliance
Children's Alliance
Children's Institute
Clayton Early Learning
Colorado Children's Campaign
Early Edge California
First 5 LA
Hawaii Children's Action Network
Kansas Action for Children
LAUP
Maine Children's Alliance
Maryland Family Network
New Mexico Association for the Education of Young Children
New Mexico Voices for Children
North Carolina Early Childhood Foundation
Ounce of Prevention
Pennsylvania Partnerships for Children
Rhode Island KIDS COUNT
Strategies for Children
The North Carolina Partnership for Children, Inc.

VOICES for Alabama's Children
Voices for Georgia's Children
Voices for Virginia's Children
Washington State Association of Head Start & ECEAP
Wisconsin Council on Children and Families