

National Association for the Education of Young Children

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May 16, 2014

Secretary Arne Duncan
U.S. Department of Education
Washington, DC

Secretary Kathleen Sebelius
U.S. Department of Health and Human Services
Washington, DC

Dear Secretaries Duncan and Sebelius:

The National Association for the Education of Young Children (NAEYC), the nation's leading professional association for those working with and on behalf of high-quality early childhood education, is pleased to submit comments to the draft Executive Summaries of the Preschool Development and Preschool Expansion Grants authorized under the fiscal year 2014 Appropriations Act. We will be submitting these comments on the Department of Education's blog as requested in the public notice.

Strengthening the commitment to mixed delivery system

The majority of state and local prekindergarten programs pursue a "mixed delivery" system – child care, Head Start, and school providers who can meet the state quality standards can apply for funds directly or through subcontract. A mixed delivery system has several positive features: it allows parents flexibility in where they will enroll their children and creates seamless experiences in the same setting often from the time the child is an infant. A mixed delivery system also strengthens the entire early childhood system by raising and supporting quality in all settings serving young children. Although the definition of Early Learning Provider is an inclusive list, the mechanism for state-to-local grantmaking is not.

The Development and Expansion Grant applications should have a competitive priority for States that agree to use these funds for quality support and expanded services across the diversity of child care, Head Start, and school providers. A requirement of a diverse delivery system will result in better quality across the states' early childhood system, benefit working families who need more than a school-length day for their children's care and learning, and provide young children with greater consistency of quality care throughout the day and year. **The application should be clear that subgrantees can be child care and Head Start programs that meet the quality standards so long as a teacher is enrolled and making progress toward the Bachelor degree requirement. This has been a policy used effectively in some states to build a high-quality, diverse delivery system for preschool.**

In addition, the application should require that States describe how they conducted thorough and transparent outreach to the array of eligible Early Learning Providers to receive funding. The State should collaborate with the Early Childhood Intermediary Organizations to conduct that outreach across all of the types of Early Learning Providers.

The MOUs, even preliminary, may be difficult to acquire in a short application phase. These letters of intent or MOUs could be required in the 90-day Scope Of Work period. However, they are not necessary for the application. The State will have determined - based on a state needs assessment - a geographic area to serve and the application will also describe uses of funds for quality and infrastructure development, as well as any expanded number of children to be served. While large systems (school districts) can respond quickly to such an MOU request, it will be difficult for state systems to obtain individual MOU's with the small, independent, and diverse providers intended to participate in a mixed delivery system.

In order to promote a state-federal partnership, the application should allow states to subgrant in the same manner and to the same diversity of providers as permitted under its current state-funded programs. States should be required to demonstrate the quality commitment that their state systems require in order for programs to be eligible.

Aligning to and using NAEYC early childhood program standards to define research-based standards for high-quality preschool and program standards

The definition of Program Standards and High-Quality Preschool Program should reflect the 10 research-based NAEYC early childhood program standards. (The standards are described at www.naeyc.org/files/academy/file/OverviewStandards.pdf) The draft Development and Expansion Grants document names the Head Start program performance standards and the NIEER benchmarks in its state prekindergarten report, but fails to note NAEYC early childhood program standards. There are states that use NAEYC's early childhood program standards as an eligibility threshold. For example, Connecticut's School Readiness Program and the newly enacted preschool program in public schools both require providers to meet NAEYC early childhood program standards. Boston Public Schools have committed themselves to NAEYC accreditation for their preschool and kindergarten programs. Their studies show a relationship between NAEYC early childhood program accreditation and children's better academic outcomes. www.bostonpublicschools.org/cms/lib07/MA01906464/Centricity/Domain/111/4-9-12_early_childhood_presentation.pdf

The 10 NAEYC early childhood program standards – some of which are captured in (a) through (l) – are research-based and have been (externally) tested for their validity as program standards. If the federal government names in the application or accompanying materials private entities that have developed indicators, standards, or benchmarks of program quality, then NAEYC must be named as well. At a minimum, the ten standards areas should be explicitly listed in the definition. The areas not currently listed in the draft include 1) the program establishes and maintains collaborative relationships with each child's family to foster children's development in all settings. These relationships are sensitive to family composition, language, and culture 2) The program promotes positive relationships among all children and adults to encourage each child's sense of individual worth and belonging as part of a community and to foster each child's ability to contribute as a responsible community member 3) The program uses developmentally, culturally, and linguistically appropriate and effective teaching approaches that enhance each child's learning and development in the context of the program's curriculum goal 4) The program effectively implements policies, procedures, and systems that support stable staff and strong personnel, fiscal, and program management so all children, families, and staff have high quality experiences; and 5) The program is informed by ongoing systematic, formal, and informal assessment approaches to provide information on children's learning and development. These assessments occur

within the context of reciprocal communications with families and with sensitivity to the cultural contexts in which children develop. Assessment results are used to benefit children by informing sound decisions about children, teaching, and program improvement. The item (g) on curricula should be modified to “the program implements a curriculum that is consistent with its goals for children and promotes learning and development in each of the following areas: social, emotional, physical, language, and cognitive.”

Supporting early childhood educators across all settings to reach the teacher qualifications requirement

The Congressional report accompanying the fiscal year 2014 appropriations bill that created the Preschool Development and Expansion Grants states that “funds may also be used to help early childhood educators to attain higher credentials and degrees.” This is not reflected in the list of the uses of funds in the Development and Expansion drafts. A genuine commitment to a high-quality system of early childhood education, including a diverse delivery system of preschool, requires a commitment to helping teachers earn the required Bachelor degree. Both Development and Expansion grants should require States to spend a portion of the funds to help teachers in child care and Head Start programs meet the degree requirement through scholarships, release time, and other supports. New Jersey’s Abbott preschool program and North Carolina’s state preschool program made this commitment, and their preschool systems are stronger as a result.

The quality of the teacher-child interaction is the linchpin of quality and deserves more directed attention with these resources. **We strongly suggest the following language in the Development and Expansion grants: States are required to use a portion of the quality and infrastructure funds to provide scholarships, release time, and other supports to help teachers in child care and Head Start programs to meet the degree requirement and be given four years of such assistance. States should also be required to use the grant funds on other early childhood workforce support.**

Directing the competition with Competitive Priority points for Promise Zones

The Promise Zones (compared to the Promise Neighborhood awards) reach only five localities. The additional points for states – and the federal suggestion to partner with certain localities that may or may not be the best selection for the use of Development or Expansion grants – tips the competition to five states and pre-determines the selection of the local catchment area for preschool quality and expansion funds. **We urge you to eliminate this as a competitive priority and instead include Promise Zones in the list of programs and funding streams which the State needs to leverage and coordinate to improve and expand high-quality early childhood programs.**

Creating flexibility to serve younger children

The drafts state that the funds will be used to pay for delivering preschool to 4-year old children. **If State or local preschool programs are serving four and three-year-olds in their preschool programs, they should be allowed to serve eligible four-year-olds and with remaining resources serve 3-year-olds in families under 200% of the federal poverty line.** The prekindergarten program is part of a larger continuum of learning that starts at birth, and the earlier children have access to quality experiences the better prepared they will be for school and life successes.

NAEYC looks forward to discussing these recommendations with you, and working toward high-quality early childhood education for all children from birth through age eight.

Sincerely,

A handwritten signature in blue ink that reads "Rhian Evans Allvin". The signature is fluid and cursive, with the first name "Rhian" being the most prominent.

Rhian Evans Allvin
Executive Director