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October 8, 2014

The Honorable Arne Duncan
Secretary
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Docket ID: ED–2014–OESE–0079
Comments on Proposed Requirements—School Improvement Grants

Dear Secretary Duncan:

The National Association for the Education of Young Children (NAEYC), a leading voice for quality early learning for children from birth through age 8, is pleased to submit comments to the Federal Register request of September 5 on School Improvement Grants (SIG).

NAEYC is pleased that high-quality, well-financed preschool and full-day kindergarten have been allowable uses of the SIG grants to date and that the impetus behind the proposed Early Learning Intervention Model is to provide more children with high-quality preschool and kindergarten experiences. NAEYC is also pleased that the proposed model would require educators be given time for planning across the grades, that schools would use a comprehensive, developmentally appropriate instructional program, embedded professional development aligned with the comprehensive approach to instruction, and the use of assessments for improving instruction to meet the needs of individual children.

We are concerned, however, that language in the proposed model would be interpreted as restricting the expansion of high-quality preschool programs to elementary school sites and that evaluations of teachers in the early grades would be based on child assessments. In addition, we recommend adding evidence-based home visiting partnerships with schools as an allowable use of the SIG early intervention model. NAEYC provides the following recommendations to strengthen the turnaround of low-performing schools with the SIG resources.

Preschool Delivered by the Range of Settings That Can Meet Standards of Quality

The Department proposes adding an Early Learning Intervention Model "in an elementary school" and that "under this proposed requirement, an LEA implementing the early learning intervention model in

an elementary school" must "establish or expand a high-quality preschool program." We raise two issues of concern with the language as written:

First, the language could be interpreted to allow only elementary schools to establish or expand preschool access. This language would be a stricter limit than the Department's current guidance on the use of Title I funds for preschool, which allows schools to use Title I funds to partner or contract with community-based preschool providers to expand preschool services. Most state prekindergarten programs rely on a range of eligible providers who can meet quality standards. The SIG Early Intervention Model should not create a parallel, new prekindergarten program within a district; instead, it should build on the state and district use of high-quality child care and Head Start programs as well as school sites. When an elementary school is low-performing, it may be particularly important to have the school partner with an established high-quality child care (such as those accredited by NAEYC) and Head Start programs instead of establishing a new prekindergarten program in the school with new staff as the school works to change its low-performing status.

We urge the Department to modify the language to read as follows:

"Under this proposed requirement, an LEA implementing the early learning intervention model <u>for</u> an elementary school must

(1) Implement each of the following early learning strategies –

(A) Offer full-day kindergarten <u>taught by teachers with specialized knowledge, certifications or endorsements in early childhood education</u>;

(B) Establish or expand high-quality preschool <u>opportunities through contracts with a licensed child care or Head Start program that can meet the definition of a high-quality program, or implement expansion of a school-based program that meets the definition of a high-quality preschool program;</u>

(6) Use data to identify and implement an instructional program that (a) is research-based, developmentally appropriate, and vertically aligned from one grade to the next <u>in a forward developmental progression</u>, as well as aligned with State early learning and development standards, and (b) in the early grades, promotes the full range of academic content <u>and other skills</u> across domains of development, including math and science, language and literacy, socio-emotional skills, self-regulation, and executive functions and physical development;

Second, to determine whether a provider is high-quality, the Department intends to use the definition of a high-quality preschool program in the Preschool Development Grants; NAEYC strongly urges the Department to add "<u>meaningful family and community engagement</u>" to that definition. Also, similar to the Preschool Development Grants, the elementary school receiving SIG funds for a turnaround model should be required to enter into a partnership with local child care and Head Start programs for joint professional development and transition services. Likewise, if a child care of Head Start program delivers preschool services with SIG funds, it should describe how it will partner with the local elementary school on appropriate and effective transitions to build continuity of high-quality early learning.

Early learning Should Not Be a Sole Turnaround Strategy

Whether the preschool program is provided by a child care, Head Start, or school, preschool should not be the sole strategy for the turnaround of a school in which children are not achieving at grade level. We believe that a single year of education should not be the sole basis of an entire school's turnaround strategy. Children's learning is a continuum that depends on high-quality, developmentally appropriate and effective teaching in each year – before, during, and after preschool. Therefore we strongly urge the Department to encourage high-quality preschool and high-quality full-day kindergarten, but not to allow them to be the sole turnaround strategies with a SIG grant.

Continuous Family and Community Engagement Should Be Required in the Turnaround Model

The definition of a quality preschool program is the same as the Preschool Development Grants. We note that the definition in the Preschool Development Grants fails to mention family and community engagement. We believe this is critical to the success of preschool, indeed of all educational, programs. Research of effective preschool programs, particularly those with low-income children, highlight the importance of continuous family engagement. We strongly urge the Department to add "continuous family and community engagement" to the early learning SIG proposal.

Kindergarten Attention Should be on Quality, Not Only Length of Day

Full-day kindergarten is required as part of the Early Learning Intervention Model. We are pleased that the Department would require the use of a research-based and developmentally appropriate instructional program that addresses all domains of development, including social and emotional development, through the early grades. As the National Research Council noted, "A parallel effort to raise the attention of practitioners in the K through 12 arena to the importance of social/emotional development and approaches to learning not only would improve the learning environment for elementary children, it would create a better environment to address alignment issues."

The final language should also require that schools assign to the early grades teachers with certifications and endorsements in early childhood education. Children's normal range of variation in development and the ability to individualize instruction continues through age eight. In order to promote effective teaching for young children, teachers in the early grades should have credentials and professional development that recognizes the specialized knowledge and skills needed to work with children in the preschool through third grade years. Our proposed language is "Offer full-day kindergarten that uses developmentally appropriate (including culturally and linguistically) standards, curriculum and assessments that address all domains of learning and development, with teachers who have specialized knowledge, credentials, and ongoing professional development relevant to the ages and development of the children in the program, with continuous, meaningful family and community engagement."

Include Home Visiting as an Allowable Use of the SIG funds

Many children start off life with fewer supports: mothers with less educational attainment; family incomes that make the basics of healthy homes and nutrition unstable; and other health and safety

concerns. In order for schools to do better, children must have conditions at home that can support good teaching. Evidence-based home visiting helps to create healthy development and engage families in their children's learning from a very early age. The SIG models often include family and community engagement, but they start when the child enters the school. Schools and school districts should be encouraged to partner with evidence-based home visiting programs so that children and families can have a stronger start before the child enters school, and then continue in the school with meaningful family engagement. This language should be added to the Increased Learning Time as well as the early childhood provisions.

Teacher and Principal Evaluation in the Early Grades Should Not Use Child Assessment as a Dominant Factor

The Department proposes that the Early Learning Intervention Model incorporate the same approach to teacher evaluation system that is used for teachers in the higher grades of schools. Researchers have issued cautions about using "value added" models of teacher evaluation. NAEYC promotes appropriate assessment of children to inform teaching practices and services. However, the linkage of child test scores to evaluations of teacher and principal performance is not an appropriate use of child assessments. The National Research Council's 2008 report, Early Childhood Assessment: Why, What, and How, defines high-stakes assessments as tests or assessment processes for which the results lead to significant sanctions or rewards for children, their teachers, administrators, schools, programs, or school systems."[1] In the same report, the expert panel urged "even more extreme caution" when using assessments of children from birth to age five for accountability.[2] The unintended consequences of using child assessments in preschool through third grade for teacher, principal and school accountability can lead to "teaching to the test," an undue amount of time spent in test-taking preparation.

We welcome the opportunity to discuss these issues further and to help every school be successful in supporting each child to reach his or her potential.

Sincerely,

Rhian Evans Allvin
Executive Director

[1] National Research Council, Early Childhood Assessment: Why, What, and How at page 425. (Washington, DC 2008).
[2] Ibid at pages 358-359.