

July 11, 2011

The Honorable Kathleen Sebelius
U.S. Department of Health & Human Services
200 Independence Avenue, SW
Washington, D.C. 20201

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

Dear Secretaries Sebelius and Duncan:

We support the goals of the Race to the Top-Early Learning Challenge (RTT-ELC) and welcome the Administration's recognition of the importance of early learning for a young child's future success in school and in life. The commitment of \$500 million to this important initiative will allow a group of states a greater opportunity to focus on improving the quality of early learning experiences for our most disadvantaged children. We also appreciate the significant effort that went into developing the Selection Criteria and would like to submit several comments that we believe would strengthen the competitive grant process and the uses of these new grant funds to improve the positive development and education of young children.

Ensuring Early Learning Programs Can Meet High Standards

We encourage adding to the criteria a requirement for states to indicate how they intend to spend RTT-ELC funds in a balanced manner that addresses both data systems and kindergarten entry assessments as well as supports to help early learning programs improve their ability to meet the tiered program standards, including through training, technical assistance, financial rewards or incentives, higher subsidy reimbursement rates, and teacher compensation, as well as support for a strong and high-quality early childhood workforce.

In addition, it is critical that the criteria highlight the importance of practices and policies that support the improvement of early learning programs in ensuring the effectiveness of quality rating and improvement systems (QRIS). To that end, **we recommend** that this "improvement" component stand on its own as a new (C)(4) in the selection criteria, rather than be grouped together with rating and monitoring as currently in criteria (C)(3). **We also strongly recommend** that the Program Requirements section include the following language:

"The State will use a significant portion of the funds under this grant for resources to help programs improve and sustain higher quality and for improving the workforce under [our proposed new] (C)(4) and section D of the draft."

Ensuring Appropriate Assessment and Uses of Assessment

We are pleased that in a number of places the use of child assessment is tied to improving instruction. To be consistent throughout, **we strongly recommend** that the following language be added to the Program Requirements section: The state will use assessments of children as part of the Comprehensive System of Assessments and the Kindergarten Entry Assessments for the purposes of improving professional development, instruction and program quality, and shall not use such child assessments to provide rewards or sanctions for children, teachers, or programs.

We support efforts to encourage a comprehensive approach to assessment that addresses all domains of children's learning and development. As a way to strengthen the language in the Selection Criteria, in keeping with the National Academy of Sciences (NAS) reports on child assessment, **we recommend the following:**

- That the definition of Comprehensive Assessment System make clear that there should be multiple assessments across all domains of development and learning for infants, toddlers, and preschoolers, and that these include assessments based on teacher observation that would help improve instruction.
- That a fully comprehensive assessment system should include community needs assessments which are essential to put child development and progress into context. There are states conducting "reach" and "risk" and states that participate in the Getting Ready Indicators work, along with a number of communities that are using the Early Development Instrument, another tool for looking at the needs and assets of a community that support the school readiness of children in that community.
- That the state should have the option of using a sample of children (which would be weighted to include more low income and disadvantaged children) for the kindergarten entry assessment.

The current state of child assessment remains as stated by the NAS in *Eager to Learn*: "in flux." More and better assessments are needed in some domains, for infants and toddlers, and for dual language learners. As to the kindergarten entry assessment in the draft criteria, we would like to raise several concerns. A one-time snapshot of a child entering a kindergarten classroom cannot adequately reflect the accumulation of child's experiences over the previous five years. They should not be seen as reflecting on the quality of early care and education during the pre-kindergarten year in isolation from demographic risk, other early care and education experiences, and the resources available to support professional development and improve quality.

Moreover, assessing every child that enters a public kindergarten classroom is very expensive and time-intensive. If the purpose is to use the kindergarten entry assessment to help inform better professional development, better selection of curricula, and other factors that would improve the quality of learning for children before kindergarten, then a sample of children would serve that purpose.

Creating a Strong Early Childhood Workforce

Focusing attention on the early childhood workforce in the performance measures is a positive step. However, the criteria also should include the policies that provide overall systems governance, as well as the linkages across and among system elements.

The workforce measures section represents a significant opportunity to encourage not only some essential elements, but also the overall importance of an integrated state professional development system itself and its integral role in states' overarching quality improvement efforts. This comprehensive, integrated systems approach is more clearly expressed in the Child Care and Development Fund (CCDF) preprint and we **recommend** that the RTT-ELC program criteria be closely aligned with that guidance, which also includes professional development in the program/workplace such as mentoring and other technical assistance, articulation of credits, degrees and coursework, quality assurances, an advisory structure, and financing for the system.

In addition, given that a well-trained and well-compensated workforce is so fundamental to high-quality programs, **we encourage the addition of a commitment** to the workforce as Performance Measure (A) (2) (d).

Ensuring Low-Income Children's Access to High-Quality Child Care

We share the goal of ensuring that all children, especially high-needs children, have access to high-quality early learning and development programs that help them get ready for school. Yet, we are concerned that existing resources, even with these additional grant funds, will not be sufficient for moving toward or meeting this goal. Early learning and development programs, unlike primary and secondary school, do not have a base of substantial state and local funding. Early childhood investments are particularly vulnerable now due to funding cuts at both the federal and state levels. While the appropriation for the Child Care and Development Block Grant (CCDBG) was increased by \$100 million in the FY 2011 budget, this replaced only a fraction of the \$1 billion per year provided under the American Recovery and Reinvestment Act for 2009 and 2010.

As a direct result of this loss in federal funds and state funding cuts, many states are reducing access to child care assistance. For example, Florida's waiting list for child care assistance had nearly 68,000 children on it as of February 2011, and a funding cut of \$68 million could result in 15,000 fewer children receiving assistance. Arizona has already cut the number of children receiving child care assistance from 48,000 to 29,000 since February 2009, and the state's 2012 budget eliminates the entire state general fund appropriation for child care, which could further reduce the number of children receiving child care assistance.

It is not possible to ensure that more low-income children attend higher-quality early learning and development programs solely or even largely by repurposing or reallocating existing funding. **We recommend** that the final criteria for the RTT-ELC include some mechanism for states to show that they have maintained participation in federal early childhood programs, maintained state investments in child care, prekindergarten, Head Start, Early Head Start, and full-day kindergarten, and will not cut children from these programs in response to state budgetary shortfalls. In addition, to maintain basic supports for children, we encourage the Departments to expand the criteria and/or guarantees to:

- Ensure that states maintain a strong core licensing system that ensures the health and safety of children in all child care settings must be maintained. It is important to increase the staff available to monitor and assess programs participating in a state's QRIS system, but it is equally important to maintain the critical health and safety of children in child care by **not** reducing investments in core licensing and monitoring functions.
- Ensure that states maintain child care assistance policies that provide high-need children and their families with access to assistance with the cost of care. Child care assistance is an important family support, and without it families are at risk of financial stress and economic insecurity, which jeopardizes children's healthy development. States should be required to provide assurances that low-income parents receiving child care assistance will not be asked to take on the costs of improved quality through increased co-payments. States should also be disincentivized from reducing reimbursement rates for child care

providers, which are already far too low, or setting more restrictive eligibility criteria for child care assistance. In addition, while the focus of this grant is early learning, states should be expected to maintain access for older school-age children to child care assistance funded through the CCDBG, which serves children up to age 13. Before- and after-school programs are crucial for ensuring the safety and well-being of school-age children, and CCDBG funding provides an essential source of support for these programs, especially as state resources are cut back.

- Emphasize the importance of full-day, full-year programs for working families. If high-quality programs are not available on a full-day, full-year basis, children in working families will have less positive outcomes. Research suggests that for many children at risk of school failure, more hours in high-quality programs have a positive impact on school readiness. States should incentivize programs in QRIS and other innovative approaches to offer full-day and year programming.

We greatly appreciate the work that went into the development of these guidelines and criteria and many of the elements that were incorporated in the competition. In particular, we appreciate the collaborative approach encouraged by the guidelines, through steps such as the requirement that not only the various agencies support children's early learning but also key individuals with expertise in these areas participate in the development of and sign off on the application. We believe that our recommendations will help the RTT-ELC better meet its goal of increasing the availability of and access to high-quality early learning and development programs.

Sincerely,

American Federation of State, County and Municipal Employees
Children's Defense Fund

CLASP

Early Care and Education Consortium

Easter Seals

First Five Years Fund

First Focus

HighScope Educational Research Foundation

Learning Disabilities Association of America

National Association for Regulatory Administration (NARA Licensing)

National Association for the Education of Young Children

National Association of Early Childhood Specialists in State Departments of Education
(NAECS-SDE)

National Head Start Association

National Women's Law Center

RESULTS

Voices for America's Children

YMCA of the USA

ZERO TO THREE