

June 3, 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:

As organizations representing those who work with or on behalf of young children and high quality early childhood development and education, we have been strong supporters of the Early Learning Challenge Fund. We are pleased to see a \$500 million investment in grants to states to improve their integrated, cross-sector systems to improve the quality of programs across all settings and to increase the number of low-income and disadvantaged infants, toddlers and preschool children in higher quality settings. States are in differing stages of implementation of the components of a system, and these new resources can help them build on their current systems and support early childhood programs in meeting and sustaining higher levels of quality.

Together, we submit the attached recommendations for the state applications for the Race to the Top-Early Learning Challenge grant competition. The structure of our recommendations follows the outline of absolute, competitive and invitational priorities of the April 2010 Race to the Top Application. We have taken a comprehensive approach, looking at state examples and to the research of child development and learning on what children and families need and how programs can effectively and appropriately help them be successful.

As nationally recognized economists have noted, investments in high-quality early childhood education are important investments that our government must make to improve the long-term educational and economic health of our country. The Race to the Top-Early Learning Challenge grants, as well as increased investments in Fiscal Year 2012 for the other core early childhood programs such as the Child Care and Development Block Grant, Early Head Start, Head Start, the Child and Adult Care Food Program, Section 619 and Part C of IDEA, will help make it possible for states to have high-quality systems of early childhood education and for more disadvantaged children to get the strong start they need to become productive and successful citizens.

Sincerely,

American Humane Association
CLASP
Early Care and Education Consortium
First Focus
National Association for the Education of Young Children
National Black Child Development Institute
National Organization for Women
National Women's Law Center
Teaching Strategies, Inc.
ZERO TO THREE

As noted in PL112-10, which funded the Race to the Top Early Learning Challenge (RTT-ELC), there are two goals of the grant program. The legislation notes that states will take actions to “(A) increase the number and percentage of low-income and disadvantaged children in each age group of infants, toddlers, and pre-schoolers who are enrolled in high-quality early learning programs; (B) design and implement an integrated system of high-quality early learning programs and services.”

The design of the Early Learning Challenge should work to meet both of these goals, specifically by:

- Supporting states in the development and implementation of a cross sector integrated system designed to improve the quality of early childhood programs, including licensed and regulated center-based child care programs, family child care programs, state-funded prekindergarten, Head Start and Early Head Start programs, early intervention and special education, and school-based early childhood programs, and
- Increasing the number and percentage of low-income and disadvantaged children in each age group of infants, toddlers and preschoolers, accounting for disparities in service availability and delivery, who are enrolled in higher quality early childhood programs and services across the sectors.

Importantly, as states are designing systems to meet these goals, the legislation also requires that they will take actions to ensure that any use of assessments conforms to the recommendations of the National Research Council’s reports on early childhood.

The Early Learning Challenge should be designed as a competitive three-year grant that allows a range of states to access funds to support and improve their systems. States should be allowed to compete wherever they are in the development of their system, as long as they meet some basic requirements.

DEFINITIONS

1. **LOW-INCOME OR DISADVANTAGED-** The term ‘low-income’ means a child whose family income meets income eligibility for CCDBG as defined by the state. The term ‘disadvantaged’ includes those populations included in state eligibility for CCDBG services, including children with special needs, language minority children, children in protective services, children who are homeless, and other special populations.
2. **EARLY CHILDHOOD PROGRAM/EARLY LEARNING PROGRAM-**has the definition given to “early childhood program” in the Higher Education Act.

ABSOLUTE PRIORITIES:

1. General Eligibility:

- a. **DEVELOPMENT OF APPLICATION** - The Governor shall designate the state agency or agencies to oversee the development and implementation of the grant application. States must demonstrate joint development of applications with State Departments of Education and the agency that oversees CCDBG, as well as demonstrated participation of the Early Childhood Specialist, the administrator for IDEA Part B and Part C programs, the administrator of the state pre-kindergarten program, and the Head Start Collaboration Director, with specific sign off by the CCDBG administrator, in consultation with the Early Childhood Advisory Council and the state agency administering the Maternal, Infant, and Early Childhood Home Visiting program.
- b. **STATE MATCH REQUIREMENT** – States will meet a 15 percent state (non-federal) match spending requirement. The 15 percent non-federal share may be comprised of any non-federal resources, including state, local, private, or in-kind contributions.
- c. **SUSTAINABILITY** - States will maintain current investments in early childhood programs and will ensure the sustainability of the efforts supported in this grant beyond the period of the grant.
- d. **APPROPRIATE USES OF ASSESSMENT**--As part of their integrated systems, including data collection and its uses, the state must assure that assessments of individual children will not be used to provide rewards or sanctions for children, teachers or programs; that assessments of individual children shall be valid and reliable for the purpose for which they are developed and used; and that assessment information shall be used for improving instruction or classroom environment, targeting professional development, determining diagnostic needs and making referral to services, and informing quality improvement process at the state level. (See Appendix for a detailed discussion of appropriate assessment.)
- e. **REPORTING**– The state will report on an annual basis on system improvements and increases in the number and percentage of low income and disadvantaged children in higher quality programs. Such reporting shall include: additional early childhood credentials and degrees earned disaggregated by the setting in which the person works and the age of children the person works with; retention and compensation increases for individuals with improved credentials and degrees; number and percentage of settings that meet and sustain higher levels of quality and the ages of children served in those settings; increase in the availability of full-day and full-year services of

higher quality in communities of low- income families; increased access to higher quality programs for children disaggregated by income, age, geographic location, race, ethnicity and English language proficiency and for children with special needs; and implementation of a data system that coordinates early childhood data collection efforts regarding programs and services for children and the early childhood workforce.

2. Integrated Systems of High-Quality Early Learning and Development:

- a. **ESTABLISHING A SYSTEM OF QUALITY** --The state's application must detail a plan to address how the state will design and implement a cross-sector integrated system of early learning programs and services (including licensed and regulated center-based child care programs, family child care programs, state-funded pre-kindergarten, Head Start and Early Head Start programs, early intervention and special education, and school-based early childhood programs, as well as home visiting programs as appropriate) that establishes consistent definitions and expectations of high quality across all programs. The application must demonstrate coordination with other systems that could provide comprehensive services, including health and mental health, dental, and family support for low-income and disadvantaged children.

This system, which may include but is not limited to a quality rating and improvement system (QRIS) refers to a systematic framework for evaluating, improving, and communicating the level of quality in early childhood programs and contains four key elements:

- 1) Program standards.¹
- 2) Financial incentives and non-monetary supports to programs and providers to meet and sustain higher levels of quality program standards including higher compensation that reflects additional education and promotes retention;

¹ Experts recommend that to be effective, program standards should address physical environment (including health, safety, ratios, class size); staff qualifications and professional development; collaborative relationships with families and communities; developmentally and culturally appropriate curricula and teaching practices that addresses cognitive (including literacy and math), social, emotional and physical development and approaches to learning; use of ongoing formal and informal assessment approaches to help guide instruction and services for children; nutrition and health; and leadership and management that promotes strong staff, fiscal and program management.

- 3) Quality assurance and monitoring including regular evaluation and public reporting, an adequate number of well-trained evaluators and access for programs to technical assistance for continuous quality improvement;
- 4) Family engagement, outreach, and consumer education for families and early childhood education programs that are culturally and linguistically accessible and that are inclusive and respectful of the diversity of families and children.

States' integrated systems must include all of the above elements of a quality system. States will demonstrate the extent to which their integrated system serves low-income and disadvantaged children across the range of early childhood education programs. The integrated system of high quality early learning programs will seek to reduce disparities of access for low-income and disadvantaged children to high quality programs across all ages (infants, toddlers, and preschool age), geographic distributions, races and ethnicities, levels of English proficiency, and special needs.

- b. **STATE EARLY LEARNING GUIDELINES and/or STANDARDS**-- States will demonstrate the breadth and depth of birth to kindergarten early learning standards (e.g., language arts, math, social, emotional, and physical development, approaches to learning at a minimum) and that training is available to providers in the range of programs serving young children on those standards and their implementation. States will receive additional points if their application shows particular emphasis on training and professional development in children's social and emotional development and/or appropriately serving English Language Learners.
- c. **PROFESSIONAL DEVELOPMENT SYSTEMS** – States will demonstrate evidence of an early childhood professional development system whose policies and resources are integrated across the sectors (Head Start, Early Head Start, center-based child care, family child care and state- or locally-funded prekindergarten and early intervention). Policies must address professional standards and career pathways; quality assurances for the system; compensation; workforce data collection; articulation of credits, degrees and coursework; attention to workforce diversity; and an advisory structure for the system.
- d. **STATE DATA SYSTEM** – States will develop state data systems such that they have the capacity to track the number and percent of low-income and disadvantaged children in high-quality early learning programs and be able to disaggregate by:
 - 1) Child age and other demographic information, including race, ethnicity, English language proficiency, and geographic location delineated by urban or rural community

- 2) Type of early childhood program
 - 3) Workforce qualities including credentials, compensation, demographic information, types of professional preparation and development received. Workforce data must disaggregate by program, ages of children served, demographics of individuals in the workforce, financial resources for individuals, and compensation (salaries and benefits)
 - 4) Distribution of high quality early childhood programs in low-income communities
3. **FUNDS TO PROGRAMS** –States will ensure that a significant portion of funds received goes directly to early childhood programs, reflecting the disparate needs by age group, to increase and sustain the level of quality of programs and services for low-income and disadvantaged children.
 4. **FULL DAY, FULL YEAR SERVICES**—States will demonstrate how the integrated system will help expand the availability of high quality full-day and full- year early childhood programs in low-income communities throughout the state (including both rural and urban communities).
 5. **CHILD CARE QUALITY INVESTMENTS**—States will demonstrate how they have aligned spending on quality activities through their CCDBG state grant with the activities of their cross sector integrated system.
 6. **CHILD CARE LICENSING** - States will not diminish or reduce their federal, state, or local commitment to their state child care licensing and monitoring systems. States will demonstrate that they will, at a minimum, maintain their current commitment to the protection of children in licensed child care.
 7. **EARLY LEARNING PROGRAMS IN LOW-INCOME COMMUNITIES** – States will demonstrate that they will increase the availability of high quality licensed and regulated early childhood programs in low-income communities over the grant period.
 8. **SCHOLARSHIP AND COMPENSATION INITIATIVE** - States will design and implement a system of workforce supports such as scholarships to attain a credential or degree, salary/wage supplements and other compensation benefits (such as health care, pension) that is aligned with the elements of the integrated system of high quality early learning programs and services, including the professional development system.

COMPETITIVE PRIORITIES:

1. **CHILD CARE LICENSING IMPROVEMENTS** – States will make improvements that strengthen their child care licensing systems; for example, improving adult:child ratios,

improving group size requirements, increasing preservice and ongoing training requirements, improving the child development content of training requirements and increasing the number of monitoring visits programs receive.

2. **CHILD CARE SUBSIDY** – States will make improvements to their child care subsidy systems in order to align subsidy policies with the goal of increasing the number of low-income children in high quality early learning programs. For example, states may increase provider payment rates, provide differentials for higher quality care, promote contracts for higher quality services or expand partnerships and extend eligibility periods.
3. **CHILD CARE SUBSIDY AND QRIS** – States that have established quality rating and improvement systems (QRIS) must require all licensed and regulated programs that serve children in the child care subsidy system to participate in QRIS.
4. **COMPREHENSIVE SCREENING AND SERVICE DELIVERY**– States will design and implement a coordinated system to facilitate screening, referral, and provision of services related to health, mental health, dental, developmental delay and disability, and family support and home visiting for children participating in early learning programs.
5. **INTEGRATION AND ALIGNMENT WITH HOME VISITING PROGRAMS**—States will design improvements to strengthen home visiting programs’ support of early development and learning, including developing standards for home visiting programs, and alignment of home visiting programs with early care and learning programs through such means as training and promotion of the use of Early Learning Guidelines and/or Standards and access to comprehensive services.
6. **LEVERAGING FUNDS TO EXPAND HIGH QUALITY OPPORTUNITIES**—States will demonstrate that they are using the Race to the Top Early Learning Challenge to leverage new state investments in early childhood programs that meet the comprehensive Performance Standards of Head Start or Early Head Start.

INVITATIONAL PRIORITIES:

1. **BIRTH TO THIRD GRADE CONTINUUM OF DEVELOPMENT AND LEARNING**—the state shall examine its policies and practices to develop a system of supports for birth to third grade that includes:
 - a. learning and development standards for birth through third grade to ensure that standards are developed in all domains of child development and learning (including language, literacy, mathematics, creative arts, science, social studies, social and emotional development, physical development and health, and approaches to

- learning), that such standards reflect research and evidence-based developmental and learning expectations for each level and address cultural, linguistic, and ability-level diversity, and that the standards across levels reflects progression in how children develop and learn the requisite skills and content from earlier levels forward.
- b. joint professional development between schools and community-based early childhood education programs.
 - c. support and guidance for positive transitions between early childhood programs and early elementary programs.
2. **BIRTH TO THIRD GRADE ALIGNMENT**—States shall ensure appropriate transitions from early learning programs to early elementary school.
 3. **COMMUNITY RISK ASSESSMENT**—States shall develop community-based data tracking to identify communities with children at-risk that shows how the state is meeting the needs of underserved communities and demonstrating progress in these communities on expanding the supply of high quality early childhood programs.
 4. **IMPROVING EARLY CHILDHOOD OPPORTUNITIES IN HIGHER EDUCATION**—States will work to improve the quality and supply of degrees in early childhood education from postsecondary institutions, including leveraging new resources to fund such programs, improving the capacity of core staff and curricula, and expanding articulation agreements.

Appendix – Child Assessment

Public Law 112-10 creates a new early learning initiative to increase the number of low income or disadvantaged children in high quality early childhood programs and to create and enhance state integrated systems. The statute also directs that policies and uses of child assessment must conform to the recommendations of reports of the National Academies of Science.

The use of assessment for instructional purposes and public policy purposes has gained attention over the last decade with positive and unintended negative consequences for children, programs serving young children, communities and education systems.

Young children's development requires a different approach to the conduct and use of assessment than older children. Certainly very young children require different approaches to assessment, primarily those that rely on an assessor to deliver "items" and record "responses." The use of paper and pencil tests, like those used widely for older children, is not appropriate for infants, toddlers, and young children, who lack the motor skills to complete such assessments. Young children's performance on assessments are highly influenced by non-cognitive factors; for example, most young children perform best when assessed by a familiar adult, although children with different social skills and temperament may respond similarly to a familiar and non-familiar adult. Compared with older children, young children, especially infants and toddlers, are less able to keep focused on the same task repeatedly (as is often required in standardized assessments), and factors such as fatigue and hunger can greatly influence their attention to a given task. These characteristics of young children tend to favor assessment by adults who are familiar with the child, often requiring some degree of judgments about a child's response, and his or her abilities. While such assessments may be valuable in guiding instruction, many experts have noted that they are not appropriate for high stakes accountability uses.

This distinction between two of the key purposes of assessment, to guide and improve ongoing instruction and for purposes of accountability is a critical one. These different purposes of assessment require not only different assessment measures but also substantially different implementation approaches for conducting the assessments. Ongoing assessments aimed at improving instruction, carried out by familiar adults and largely involving ongoing observation and documentation of children's learning and progress is, without question, appropriate for use in programs with young (and even very young children). However, substantial caution is needed when assessments are used for accountability purposes in programs with young children. Cautions must include using change scores so that assessments reflect children's progress and program input, and do not penalize programs that serve the highest risk children (whose assessment scores at any one point in time will reflect their risk status). Cautions must also include contextualizing child assessment data in information about program characteristics and quality. Most importantly, reviews of the research on assessments for young children make clear

that assessments conducted for purposes of accountability should be used to strengthen programs. Resources must be in place to work with programs to strengthen the facets that child assessment data, taken together with data on program quality, indicate need further focus. When assessments are conducted for purposes of accountability, it is also critical that appropriate measures and assessment procedures are used for children who are dual language learners so that the assessments capture their development appropriately.

The current state of child assessment remains as stated by the NAS in *Eager to Learn* “in flux.” While progress has been made in the development of valid and reliable assessments for young children, program evaluation, and teacher-child interaction, the NAS also states in its 2008 report that there is a great need for additional research and development.

We are clear that child assessment, when done well and for the right purposes, is valuable in helping to improve children’s experiences and the continuous improvement of quality. The joint position statement of NAEYC and NAECS-SDE on the appropriate uses for assessments of young children underscores the parameters for such assessments based upon the latest research. Such assessments must be valid and reliable for the purposes for which they are intended to be used; developmentally, culturally and linguistically appropriate, and supported with professional development and resources for program quality improvement. Selecting and using assessment to inform effective teaching practices and services is one of the ten standards of NAEYC early childhood program accreditation system. The standard states that “[t]he 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.”

Children coming from disadvantage or living in poverty are at risk for a range of developmental and academic disparities compared with other children. The use of assessments to identify specific areas of strength and those of need would be especially appropriate for these children, and advantageous in planning their early educational experiences. Such assessments tend to have their greatest strength in identifying where particular children would benefit most in terms of specific instructional approaches.

There is much work to be done in early childhood education programs with the appropriate selection, use and interpretation of child assessments – formal and informal -- across all domains. In addition to the dearth of good assessments in all domains, the early childhood workforce in large part lacks of the education and training that would ensure the appropriate uses of assessments. Thus, a challenge for this initiative will be in supporting early childhood administrators, teachers and other staff in using assessment as part of their overall support of

children's learning and development in the program as well as individualized instruction and services for each child's optimal learning.

Lastly, in a rush to show accountability for public dollars, policymakers at every level must be cautious on policies that lead to inappropriate assessment selection, implementation, and reporting. These policies go beyond the assessments themselves – they speak to how information gained (possibly for one purpose) is used and reported (possibly for different purposes). The conditions for children's positive development and learning remain highly variable especially for low income and disadvantaged children. In this recession that has grown the number of children in poverty and increased family stress and instability, how this initiative promotes appropriate assessment of young children sets the stage for a larger body of work at the state and local levels for building high quality systems and programs grounded in the research of child development and the importance of family and community in children's lives in addition to experiences in out-of-home early childhood programs.

Thus, we remind the Secretaries of Education and Health and Human Services on the cautions raised by the NAS reports.

Cautions Raised:

Eager to Learn: Educating Our Preschoolers (2000)

All assessments, and particularly assessments for accountability, must be used carefully and appropriately if they are to resolve, and not create, educational problems. Assessment of young children poses greater challenges than people generally realize...Consequently, assessment results – in particular, standardized test scores that reflect a given point in time – can easily misrepresent children's learning.

....Assessment itself is in a state of flux....uses of assessment data for purposes external to the classroom, rather than to improve educational practice directly, place a particularly heavy burden both on the assessment instruments and on the responsible adults.... If the use of external standardized tests increases in the preschool environment for reasons of public policy, it is essential that they meet the highest standards of reliability and validity.

Early Childhood Assessment: Why, What, and How (2008)

Page 425 – definition of High-stakes Assessment

Tests or assessment processes for which results lead to significant sanctions or rewards for children, their teachers, administrators, schools, programs or school systems. Sanctions may be direct (e.g., retention in grade for children, reassignment for teachers, reorganization for schools) or unintended (e.g., narrowing the curriculum, increased dropping out).

Following the best possible assessment practices is especially crucial in cases in which assessment can have significant consequences for children, teachers, or programs. The 1999 NRC report *High Stakes: Testing for Tracking, Promotion, and Graduation* urged extreme caution in basing high stakes decisions on assessment outcomes, and we conclude that even more extreme caution is needed when dealing with young children from birth to age 5 and with the early care and education system. We emphasize that a primary purpose of assessing children or classrooms is to improve the quality of early childhood care and education by identifying where more support, professional development, or funding is needed and by providing classroom personnel tools to track children's growth and adjust instruction.

The problem of mismatch between assessment purpose and assessment use is evidenced in several ways...

There are not many tools designed for large scale program evaluation, so tools designed for other purposes often are adapted (e.g., shortened or administered differently) out of necessity, without sufficiently investigating the validity of the adapted tools in their new form and for their new purpose.

As professionals dedicated to the promotion of high quality programs for children from birth to age eight, we recognize the important role that assessment plays in supporting the optimal development of young children. However, we also echo the concerns raised by the NAS committee that was specifically tasked with surveying the field of young children's assessment in raising extreme caution. Assessments that have known sound psychometric properties and uses are a great strength of our scientific and practice communities. However, there is continuing need to develop and evaluate assessments that can be used in some of the ways called for in this initiative. Failure to recognize this need can result ultimately in harming those children it is intending to help.