



## **CLASP Comments to U.S. Department of Education and U.S. Department of Health and Human Services on Preschool Development Grants Competition – March 21, 2014**

The Preschool Development Grants competition is an excellent opportunity to use funds to continue moving forward on the important goal that was established in previous Race to the Top Early Learning Challenge competitions: More High Needs Children in Higher Quality Early Learning and Development Programs. As you know, too few high needs children have access to high quality preschool. The competition should give states the flexibility to make progress on meeting high quality standards, including family engagement and comprehensive services, or expanding high quality slots for children that meet nationally recognized standards.

***How should the competition address the direction in the Conference Report to the FY14 Consolidated Appropriations Act for awards to be made to two types of grantees: low-capacity States with small or no State-funded preschool programs and high-capacity States that have a larger State-funded preschool program?***

All states should be eligible for funding including those without state-funded preschool programs, those with low-capacity programs, and those with high-capacity programs. Low-capacity states should use funds to make progress towards meeting high quality standards in existing preschool slots and high capacity states should make progress on specific quality standards and/or expand slots to low-income children meeting high quality standards. Because states are in various stages in implementation of preschool programs, they should have discretion to decide whether funds are best used for expansion or quality improvement. We note however that even high capacity programs can make progress on meeting high quality standards, including family engagement and the provision of comprehensive services. The conference report notes that funds should be used to promote “culturally and linguistically competent strategies that encourage parent involvement,” which we note is an area where many states currently fall short. States without state funded programs should be permitted to compete and to use funds for planning purposes, infrastructure development and/or a pilot program.

***How should subgrantees that are early learning providers demonstrate strong partnerships with local education agencies and how should local education agencies demonstrate strong partnerships with early learning providers?***

The competition should allow for flexibility for different types of partnerships to be established at the local level. Communities partner in various ways including by providing joint professional development, establishing shared expectations for children’s learning and development, and implementing strategies for the transition of children from early learning programs to kindergarten. States should include coordination

and partnership requirements in the required activities for subgrantees but it should not be prescriptive. Local education agencies and community-based early learning providers should be required to describe the types of partnerships they will seek and how they will establish and maintain these partnerships.

***How should States distribute funds within the State in order to scale-up of proven preschool models in local communities?***

States should not be required to use the funds statewide but should have the flexibility to target specific disadvantaged populations or geographic areas without access based on a statewide assessment of need. States should prioritize communities most at risk and use data from the needs assessments to decide how to target resources to underserved populations of at-risk children. In their applications they should write to their approach at reaching the most disadvantaged children without access to preschool, including concentrations of low income children and dual language learners. States that are using funds for expansion and to scale-up high quality programs should conduct an assessment of local areas readiness to meet high quality standards and target funds in areas where they may fall short.

***What factors should we consider, if any, in distinguishing State applicants based on their past commitment to early learning and/or participation in federal or state grant programs, e.g., success or lack of success in previous related grant competitions, current federal support for early learning, or past State investment in early learning)?***

The greatest weight should be the state's plan to reach disadvantaged children with high quality preschool who currently lack access. Past state investment in early learning should not advantage or disadvantage a state. States who have received previous Race to the Top Grants should not be disqualified from this competition but they should also not be given a preference. Funds under this grant should coordinate with efforts under existing RTT grants, but should not duplicate or support further systems building work given the considerable need for preschool expansion for low-income children.

***How can we use these grants to support a more streamlined system of high-quality programs and services for children across the birth through age five continuum?***

States should describe their efforts to align and coordinate state and federally funded early childhood programs and how they will promote continuous access to high-quality programs from the prenatal period to age five (including home visiting and Early Head Start). To assure alignment across early childhood programs, the application must include multiple signatories from the State Early Care and Education Advisory Council and state agencies with jurisdiction over early childhood programs, such as CCDBG and home visiting.

***What can we do to encourage the sustainability of services after the grant ends (e.g. encouraging or requiring nonfederal matching funds, maintenance of effort provisions, or supplement not supplant policies)?***

Every effort should be made to allow states with limited state funding to compete for a grant. States should be held accountable for maintaining existing resources for early childhood and the competition should include "supplement not supplant" language including in earlier RTT ELC competitions. Strong MOE provisions should also be included. States should have a plan to describe how they intend to

maintain and expand funding over time and build the infrastructure for preschool, including supports for the workforce.

***What kind of absolute, competitive or invitational priorities should we consider in designing the competition?***

There should be absolute priorities in three areas: designing preschool programs that meet the needs of low-income working families including the use of mixed-delivery systems; supporting the educational and professional development needs of the workforce; and addressing the needs of special populations including low-income children, children with disabilities, and dual language learners through high quality standards.

1. **Designing preschool programs that are accessible for low-income working families.** This should include using a mixed-delivery system that includes community-based providers, including child care and Head Start providers, that may better meet the needs of working families for full day child care. The conditions of low wage work make it increasingly difficult for parents to arrange care for their children and support their early learning. About half of low-wage hourly workers have nonstandard schedules, working evenings or weekends, and more workers have unpredictable, erratic or fluctuating work schedules. These conditions exacerbate the challenges of workers who already face significant barriers to accessing affordable, quality early childhood programs. Making full-day preschool available to all four year olds offers consistency for these young children, supports their development and learning, and provides help to parents who cannot afford other quality preschool.
2. **Supporting a well-qualified, well-compensated workforce.** States should address how they are supporting the workforce, including through the provision of scholarships for early childhood educators and related support services such as substitutes and paid release time. States should describe how their program supports compensation and benefits for early childhood teachers in all settings that are comparable to the K-12 school system.
3. **Addressing the needs of special populations, including dual language learners, through high quality standards.** States should have the flexibility to target specific disadvantaged populations or geographic areas without access based on a statewide assessment of need. States should prioritize communities most at risk and use data from the needs assessments to decide how to target resources to underserved populations of at-risk children. In their applications they should write to their approach at reaching the most disadvantaged children without access to preschool, including concentrations of low income children, dual language learners. States that are using funds for expansion and to scale-up high quality programs should conduct an assessment of local areas readiness to meet high quality standards and target funds in areas where they may fall short.