



CLASP Comments to U.S. Department of Education and U.S. Department of Health and Human Services on Preschool Development and Expansion Grant Competitions– May 16, 2014

Thank you for the opportunity to comment on the preschool development and expansion grant competitions. CLASP appreciates the leadership of the Departments of Education and Health and Human Services and their strong commitment to advancing high quality early learning experiences for young children. CLASP supports many provisions in the draft executive summaries of the Development and Expansion Grant competitions, including a recognition of the time it will take development states to make infrastructure and quality improvements in development states. The following recommendations are areas where think the competition could be strengthened by additional emphasis on developing and expanding mixed-delivery preschool systems, supporting the development of the early childhood workforce and meeting the needs of English learners.

Eligibility requirements

- States should not be required to have executed MOUs with each Subgrantee in advance of submitting an application. This requirement could prevent States from conducting an open competition for Subgrantees or conducting thorough needs and capacity assessments in order to determine the most effective use of development grant resources in High Need Communities. States should have ample time to conduct outreach and enter into agreements with early learning providers. It may take States longer to identify qualified early learning providers in areas where there is not a supply of high quality preschool. Letters of intent or MOUs could be required in the 90-day Scope of Work period but should not be required for eligibility.

Application requirements

- Subgrantees should not be required to sign the state's application. We recommend changing this requirement so that States are required to submit letters of support from a broad group of early childhood stakeholders, including, if possible, early learning providers, and describe a process for selecting early learning providers.
- In addition to having letters of support from the entities listed, applicants should also have letters of support from the CCDF administrator, Head Start collaboration director, and the State Education Agency.

Competitive priorities

- We recommend that you remove Competitive Priority 4 as it unfairly advantages 5 states with federally-designated promise zones. Instead, we recommend adding a requirement that applicable states must consider the needs of promise zones and leverage and coordinate funding as appropriate.
- We recommend adding a Competitive Priority for designing preschool programs that meet the needs of low-income working families through the use of mixed-delivery systems. 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 preschool children offers consistency for these young children, supports their development and learning, and provides help to parents who cannot afford other quality preschool.

Selection Criteria

Executive Summary

- States should be **required** to use a portion of funds to support the early childhood workforce to attain higher credentials and degrees, including paying for scholarships, substitutes and other educational supports. States should ensure that these funds are used for teachers in community-based child care and Head Start programs and 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.

Ensuring Quality in Preschool Programs

- Improving teacher training and professional development programs and practices should be a mandatory use of funds.
- Under the list of areas for program quality improvement, we recommend adding:
 - *Improving standards and practices related to meeting the needs of English Language Learners*

Collaborating with Subgrantees

- We recommend requiring states to describe the process they will use for selecting Subgrantees, including sufficient outreach to diverse early learning providers in all settings.

Definitions

- Comprehensive Services: We recommend adding the italicized text below:

(b) Family engagement opportunities (taking into account home language *and culture*), such as parent conferences (including parent input about their child's development) and support services, such as parent education;

- Eligible child: States should have the flexibility to use funds for 3- and 4-year old children under 200 percent of poverty in order to be consistent with existing state preschool programs which may serve younger children and to meet the needs of younger children in high needs areas where significant numbers of 4 year olds may already be served in high quality preschool.
- High quality preschool program: We recommend adding NAEYC accreditation to the list of evidence-based and nationally recognized program standards for high quality preschool. In addition, under the minimum components of a high quality program we recommend including:
 - Adequate attention to the needs of diverse learners throughout program and content standards and teaching practices, including English language learners.