



October 6, 2014

The Honorable Arne Duncan
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 Center for Law and Social Policy (CLASP) seeks to improve the lives of low-income people by advocating for policies that deliver results that matter. As you know, high-quality, comprehensive early childhood education is an essential support for vulnerable children and their families. Thank you for the opportunity to submit comments on the proposed changes to the Department of Education’s School Improvement Grants (SIG) program. CLASP applauds the Administration’s strong commitment to advancing high-quality early learning opportunities for children from birth to age five. The proposed Early Learning Intervention Model is the latest effort to provide more children with high-quality preschool experiences, and we support the inclusion of early learning as a turnaround strategy. High-quality early education can improve important long-term outcomes for our most vulnerable young children.

We provide the following recommendations to strengthen the proposed Early Learning Model:

1. **Ensure that high-quality community-based providers are able to provide preschool services under the Early Learning Intervention Model.** In addition to providing preschool services directly, the Early Learning Intervention Model should allow Local Education Agencies (LEA) to partner or contract with community-based preschool providers, including high-quality child care and Head Start, to expand preschool services. Most states currently use this type of mixed-delivery model to provide preschool services. Additionally, high-quality providers already exist in many communities and may be better equipped to rapidly expand capacity and serve additional children. Moreover, there is a long history of LEAs partnering with community-based providers; many school districts use federal funding sources, particularly Title I of ESEA, to pay for preschool services in community-based settings. Finally, including community-based providers would better align the Early Learning Intervention Model with other preschool efforts, including Title I preschool education guidance and the Preschool Development Grants competition.

2. **Allow LEAs to provide directly (or through partnerships and contracts) home visiting services as part of the Early Learning Intervention Model.** Home visiting is an important service-delivery model that brings much needed parenting support and child development services to vulnerable families. The Administration has led the way in promoting early learning as a birth-through-five continuum that begins with home visiting. Many LEAs already use Title I of ESEA funds to provide home visiting services prior to school entry. Title I has long been used for children beginning at birth. A broad approach to preschool services that includes home visiting would better align, the SIG with other ESEA-funded programs.
3. **Do not allow Early Learning to become the *only* turnaround strategy.** While CLASP supports the idea of expanding high-quality preschool services to improve low-performing schools, we feel strongly that no single year of education should be the sole focus of a school's turnaround strategy. This is especially critical in early childhood; research shows that early childhood programs have the greatest impact when high-quality education and family support services continue into early elementary school. We recommend adopting the early learning model as a turnaround strategy *only in conjunction* with at least one other strategy. Moreover, the SIG plan should describe how the impacts of high-quality early learning experiences will be sustained over time.

Thank you for considering the above comments and for your concerted efforts to advance early learning in this country.

Sincerely,

A handwritten signature in blue ink, appearing to read 'H M', on a light-colored background.

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