



The National Association of State Early Childhood Specialists in State Departments of Education (NAECS-SDE) commends the Administration for tackling the hard task of taking a cohesive and comprehensive approach to assuring the successful development and early learning of the Nation's most precious resource, its children. Thank you, too, and for modeling what the RTT-ELC asks states to do -- step up to the very complex and challenging systems work needed to assure that success, and transcending the divides that can erupt in cross-agency efforts. We think the draft proposal goes a long way toward realizing success. We are pleased to submit specific recommendations within the online provisions.

Priority 1: Absolute Priority – Using Early Learning and Development Standards and Kindergarten Entry Assessments to Promote School Readiness

“A Fully Comprehensive Assessment” system for early learning is a worthy goal, but one that is yet unrealized in any one state, regardless of its progress on systemic efforts for young children. Furthermore, the full costs of a well-implemented, comprehensive assessment system are not currently known. Using the principles of the NRC report is commendable, but is a complex and challenging enterprise. The ELC should stress the development of credible assessment plans that move states along a continuum and measure effectiveness against the plan.

Among the increments that should be required in successful state plans are the expansion of early learning standards and assessments to include the developmental domains, extending these trajectories beyond math and literacy and from Kindergarten into the early grades. (See Priority 4.)

We concur with many of our colleagues who have already submitted comments supporting an assessment system that includes the sampling of children within the assessment system. Allow states to use randomized, stratified assessment models (like 619) -- this is based on sound psychometric principles and is cost-effective.

Priority 2: Absolute Priority – Using Tiered Quality Rating and Improvement Systems to Promote School Readiness

We fully agree that a quality improvement system must include all programs serving children birth to age five. We request that you clarify the meaning of “validating” the QRIS linked to the progress children make in relation to the tiers. We know the overall objective is the highest quality for all children. States should develop the general plan for all children but then strengthen how specific objectives meet the needs of High Risk children.

However, we suggest that states do not yet have the research on which to base the assumption that children do better and better in each respective tier. The ELC should require successful applicants to evaluate, revise and consequently validate their QRIS systems.

State plans should state explicitly how they would use program standards for collaboration and alignment across programs and grade-levels. Where there is not a direct one-on-one equivalency – states should advise how they will provide “cross-walk” or system anchors.

The tools for monitoring and evaluating system effectiveness have yet to be developed. States should set ambitious yet achievable objectives. However, all states could use clarification on what that might look like and federal guidance on how to demonstrate reasonable progress.

Priority 3: Competitive Preference Priority – Including all Early Learning and Development Programs in the Tiered Quality Rating and Improvement System

We request you clarify the eligibility requirements to include how communities and local agencies will be expected to participate with state agencies and other programs that are directly regulated and monitored by states – including Head Start grantees and associations, home visiting programs, and non-center based care.

Priority 4: Invitational Priority – Sustaining Program Effects in the Early Elementary Grades

We are concerned that not emphasizing this invitational priority may suppress innovation – would we support making this a competitive priority.

We suggest incremental objectives for a strong submission should include realizable plans for the following:

- Explicit alignment between the 0-5 early learning standards and the “common core” standards for K-3.
- Developmental standards for K-3
- Extension of full-day K
- Expanding the school day and school year for Prekindergarten through grade 3
- Training staff and teachers on diagnostic assessment/formative assessment
- Developmental standards for K-3
- Developmentally appropriate K practice
- Building a professional development system that incorporates the K-3 stakeholders
- Development of 0-8 system growth models for the 0-8 system that results in reading and math achievement in 3rd grade

Selection Criteria

(A) Successful State Systems

We request a clarification on “sustainability” that encourages states to show how they will leverage and build on current activities and commitments already made, and takes into account state imposed fiscal constraints when calculating maintenance of effort.

(B)(5) Engaging and supporting families

Program standards for family engagement have not been developed by most states—incorporate this objective in the requirements for the development of state plans.

Definitions

We request that you further define “Lead Agency” so that fiscal agency does not preclude joint application

SUBMITTED BY THE NAECS-SDE PUBLIC POLICY COMMITTEE