

November 13, 2017

Ms. Jennifer Bell-Ellwanger
U.S. Department of Education
400 Maryland Avenue SW,
Washington, DC 20202

RE: Docket ID: ED-2017-OS-0078

Dear Ms. Bell-Ellwanger,

On behalf of the undersigned early childhood education organizations, thank you for the opportunity to comment on Secretary DeVos' Proposed Supplemental Priorities and Definitions for Discretionary Grant Programs as outlined in the Federal Register from October 12, 2017.

We collectively share a commitment to some of the Department's proposed priorities, as they are designed to "empower parents and educators," "utilize and build evidence of what works," and "take strides towards ensuring equal access to the high-quality, affordable education every American student deserves." In fact, while we appreciate the reference to "increasing the number of children who enter kindergarten ready to succeed" in Proposed Priority 9, we believe our broadly shared priorities lead directly to the need for a significantly more elevated and integrated focus on high-quality early learning.

Education is a continuum, and children need an aligned, high-quality educational experience from cradle to career. Research and science, from fields as diverse as neurology, developmental science, and economics, are clear that early experiences for children from birth through age 8 build the foundation for a lifetime of learning and growth. In this extended period of rapid brain development, high-quality early childhood education, delivered in partnership between families and educators across states and settings, can ensure that all children are on a path to success.

Indeed, the dual purpose of early childhood education—helping parents work and helping children learn—along with the increasing scientific, economic and political consensus regarding the importance of early childhood education, reflects the need to have a dual federal focus on this issue, with attention from the US Department of Education, as well as the US Department of Health and Human Services.

We firmly believe that the Department of Education has a critical role to play in ensuring that children entering kindergarten are ready for school—and in ensuring that schools are ready to effectively support every child's unique development and learning. We strongly encourage the Department to ensure discretionary grant programs provide equitable opportunities to address the critical early learning experiences for young children and their families. As such, we encourage the Department to incorporate the following recommendations into the final list of supplemental priorities to highlight the importance of early investments in children's success, beginning at birth:

Overall, we encourage the Department of Education to:

- Use the phrase “early learning and education” throughout the priorities instead of “education” alone. For instance, in Proposed Priority 4, Priority 7 and Priority 10, the Department acknowledges the importance of literacy, problem solving, interpersonal and social skills to support instruction and school climate. These priorities, along with others, should be expanded to address early childhood. The Department has funded valuable projects in ensuring social emotional development and skills in young children and the need in this area continues to be great.
- Revise the language of the priorities to emphasize the critical role and involvement of families in their own child’s growth, development and learning as well as in the policy and systems development essential for successful outcomes.
- Expand references to “teachers and principals” to explicitly include early childhood educators and the related professionals who support successful outcomes for young children and their families. This includes, but is not limited to, administrators, early interventionists, therapists, family liaisons, health professionals, service coordinators, etc.

In addition, we would like to share the following specific recommendations:

- Definitions:
 - Amend the definition of “educational choice” to include an additional number indicating that educational choice is inclusive of “early learning and development programs in all settings that successfully prepare children beginning at birth for success across all domains of development.”
 - Amend the definition of “high-poverty school” to include “early learning and development program.”
- Proposed Priority 1:
 - Add “beginning at birth” to the end of the sentence “Likewise, the Secretary believes that every child, regardless of his or her ZIP code or family income, should have access to a high-quality education.”
 - Add (b) (xv) to explicitly address “children prior to the age of school entry.”
- Proposed Priority 2:
 - Add an additional bullet point (f) to read “Ensuring that any efforts to improve and assess student outcomes are developmentally-appropriate for young children from birth through third grade.”

- Proposed Priority 3: Because of the important post-secondary focus on preparing students to become teachers themselves,
 - Amend (a), (b), (c) and (d) to include “in-demand *and/or high-value*” industry sectors or occupations.
 - Add (g) to read “Promoting alignment and articulation pathways that provide students the ability to transfer credits efficiently and seamlessly.”

- Proposed Priority 4:
 - Add (e) so that it reads “Supporting developmentally-appropriate practice and instruction in promoting positive social-emotional development in early childhood education.”

- Proposed Priority 6:
 - Amend (a) so that it reads “Increasing the number of educators adequately prepared to deliver rigorous, *developmentally-appropriate* instruction in STEM fields, including *early math*, computer science...”

- Proposed Priority 7:
 - Amend (a) to read “Promoting literacy interventions supported by strong evidence, including by supporting educators *beginning in early childhood* with the knowledge, skills, and professional development...”

- Proposed Priority 8:
 - Amend the first paragraph of the background section to read, “Teaching, *beginning in early childhood*, is critically important, challenging, and complex work...”
 - Add a final sentence in the second paragraph of the background section that reads “In elementary settings in particular, effective leaders play a unique and important role in ensuring that our nation’s students have a high-quality learning experience, and it is critical to ensure that they have professional development related to developmentally-appropriate practice in the early years and early grades.”
 - Amend (c)(i) to read “Schools and early learning and development programs generally.”
 - Amend (d) to read “Developing or implementing innovative staffing or compensation models to attract effective educators, inclusive of educators working in early learning and development programs.”

- Proposed Priority 9:
 - Amend (d) to explicitly attend to the strengths of a mixed-delivery, choice-driven system for families seeking early learning opportunities in communities, so that the bullet point reads, “Increasing the number of children who enter kindergarten ready to succeed in school and in life by supporting families *to participate in the high-quality early learning setting of their choice, inclusive of community-based early childhood education*”

programs, in order to help more children obtain requisite knowledge and skills to be prepared developmentally.”

- Amend (e) so that it reads, “Creating or expanding partnerships between schools, LEAs, and/or SEAs, and community-based organizations, *including community-based early learning providers*, to provide supports and services.”

- Proposed Priority 10:
 - Add (d) to read “Creating systems, policies, and practices that reduce disciplinary disparities across race and gender, preventing and eventually eliminating expulsions and suspensions particularly in early childhood settings and up through grade 3.”

Moving forward, we hope you will include early learning, beginning at birth, as an absolute priority, or if more appropriate given the area of investment, a competitive or invitational preference priority in all Department of Education discretionary grants. This, along with full and critical funding for the Department’s core programs, including but not limited to, IDEA and Titles I and II of ESSA, will ensure continued emphasis on the importance of early investments in young children’s success.

Thank you for the opportunity to submit comments on these proposed priorities. As always, the organizations below are available and willing to provide any additional information or clarification that may be needed.

Sincerely,

National Association for the Education of Young Children
Child Care Aware of America
First Five Years Fund
ZERO TO THREE