

I am not able to attend any of the listening sessions or the Webinar, however I would like to add my voice to the discussion. I am a mother of a gifted child with multiple neurological disabilities. I am also part of a Family as Faculty team through our local PIRC in New Mexico.

I urge that you and your colleagues take seriously the parents and educators that are championing the effort to continue, and hopefully expand, early childhood education support. Because my son was "lucky" to have parents who were educated and recognized that he had exceptionalities early in his education he was able to live in an enriched environment. We sent him to Montessori Preschools that gave him mental and sensory stimulation in a manner he needed to succeed and support his giftedness. There are so many children who do not have the opportunities that my son was given. Children need to have a rich environment early in life allowing their brains to be stimulated so they are competitive with their peers. It is imperative that any neurological challenges or learning disabilities be identified before children start school to insure services will be made available to them removing any deficit when they begin school.

The result of lack of early learning support which I have encountered as an advocate is children enter the system behind their peers have huge difficulty catching up. Many schools do not want to bring children into a Rtl or have them assessed and these children are just passed up the grades without actually learning what the need to succeed. Having teachers who are well educated to identify deficits and then an education system that is committed to monitoring and assessing all children is a critical as well.

It may sound trite, but I truly believe our children are our greatest natural resource. If we do not give all children an equal chance to be successful, we are doing damage to our country's future. How will we compete in a world economy if our children have not been successful in the education process?

Thank you for listening to my feedback,
Kate Doyle

Kate Doyle
UncommonSuccess4Kids

To Whom it may Concern,

I have been a teacher in a kindergarten for 12 years. Out of my study, observations and experience I would like to comment on the Early Learning and Listening Discussion.

I am extremely concerned that the continued push towards more rigorous academics and testing of children in their early years will cause great harm to them. This harm will take many forms. One example will be the development of low self-esteem when some are unable to perform to the “standards” set for them. Anxiety issues (already prevalent in many children) will increase. Social skills (an essential ingredient for the development of emotional intelligence) will decline because more time will be spent drilling the children and less time will be spent on group interactions. Sadly, this is already a reality in many programs and as a result there has been a huge increase in the number of nursery and kindergarten children being expelled. As we require more of the children intellectually, they will lose physical capabilities. More desk time means less time for movement. Childhood obesity (and accompanying disease such as diabetes) is already a growing problem in this country.

As you contemplate the issues involved in making a decision on behalf of young children, please consider the following: Young children need ample time to play and move their bodies in order to be healthy. This creative process is a way for the children to engage their imaginations, work through emotional challenges, develop social skills and learn about the world. In a realm of personal discovery, the child cultivates his/her abilities and a sense of security.

Look back into your own childhood. What do you remember? Did you get to play? How did you feel when you had to take a test? These are not idle questions but speak to the essential nature of young human beings.

Please refrain from imposing the core standards because they appear to have been written without a comprehensive understanding of the needs of young children.

Sincerely,

Robin O’Brien

May 12, 2010

TO: The Honorable Arne Duncan
Secretary of Education
United States Department of Education

FROM: Scott P. Plotkin
Executive Director
California School Boards Association

RE: Comments to Federal Panels on Listening and Learning about Early Learning

The California School Boards Association (CSBA) Policy Platform has long supported universally available, developmentally appropriate preschool programs and early educational opportunities. As federal, state and local education leaders examine strategies to address achievement shortfalls, expanding public funding for preschool programs is often cited as one potential approach to raising student achievement. Research shows that one way to raise student achievement and bridge the achievement gap, as well as to make certain all children are ready academically, socially and emotionally to enter school, is to enroll more children in high-quality preschool. A 2007 study conducted by the RAND Corporation suggests high-quality preschool programs may narrow existing achievement and readiness gaps; however, the favorable effects from preschool programs are not likely to be significant enough to greatly reduce the large achievement shortfalls between group differences. To achieve the goal of full proficiency for all students, the researchers recommend that preschool be considered along with other strategies for raising student performance.¹ Communities throughout California have long embraced this concept. They are carrying out innovative and exciting work to provide access to quality preschool for all children, as well as related, comprehensive services for children, parents and families.

Understanding Preschool – Grade 3 Structures

In California, school districts and county offices of education often play a pivotal role in these activities by directly providing preschool services at school sites and/or working closely with local partners and families to make certain high-quality services are available. Districts and county offices are examining ways in which they may become further engaged in local preschool efforts as part of their overall plans to raise student achievement. In many communities, school districts and county offices of education are considering the research-based benefits of establishing an even more comprehensive and cohesive approach to early education, extending from preschool through the third grade.

Currently, California's preschool programs are administered through a mixed delivery system (and a patchwork system of financing), with a variety of public and private entities including school districts and county offices of education offering preschool services. California has a 40-year history of providing subsidized preschool programs for children from low-income families. Nearly \$2 billion of federal, state and local funds is spent annually in California to provide early childhood education services for

¹ Cannon, Jill S., Karoly, Lynn A. Who is ahead and who is behind? Gaps in school readiness and student achievement in the early grades for California's children, (2007). RAND Corporation. <http://www.rand.org>

preschool-age children. However, not all eligible children are being served by the existing targeted programs, and not all children who could benefit from preschool are eligible for these programs. Funding mechanisms in California provide little incentive for raising quality despite several reviews that suggest higher quality settings produce greater positive development results. Ongoing and future funding must include requirements for raising program quality to a high level, and eligibility requirements that allow access for children with the greatest needs. Fundamentally, CSBA has supported two goals for early learning in California – to simultaneously increase access while improving program quality. Given the current fiscal climate, CSBA believes the expansion of publicly-funded early learning opportunities must be phased in over a period of time, with the community prioritizing which neighborhoods and children receive services first.

In California, many in both the preschool arena and school districts acknowledge that historically, different perceptions have existed about and among the K-12 and early child care/preschool systems. These systems have often been viewed as operating separately. However, the future success of efforts to expand access to quality preschool depends upon a strong commitment from both to work in a coordinated manner. Leaders from early childhood education and K-12 agree that both systems can learn from each other and need to work to understand and appreciate each other's strengths. The nationwide movement to expand access to quality preschool presents ongoing opportunities locally for preschool providers and school districts to promote dialogue with each other, build mutual understanding, and to better integrate the roles they play in the full life of a child. Although the current programmatic and funding structures are complex and often confusing, great strides are being made at state and local levels to align and simplify. Support and direction from the federal government should provide states and local communities significant latitude to develop their own best practices.

Quality preschool programs help ensure that children are ready to learn when they enter kindergarten. A vital element of any approach to expanding preschool access involves strengthening communication between preschool staff and kindergarten/elementary school staff, as well as parents, about what is expected of children when they enter kindergarten. This also involves making certain there is a consistency in the lessons and types of instruction that all children receive before they enter kindergarten. CSBA supports incentives for outreach and collaboration between local providers, and district and school staff to share information and ensure alignment, particularly in communities where preschool programs are not located at school sites.

Workforce and Professional Development

Effective teachers, paraprofessionals and administrators are essential to delivering a high-quality early learning experience for young children. Research indicates that when preschool staff is well educated and trained, the children they teach are more successful in school. Particularly in California, a tremendous need exists in the field of early learning for high-quality professional development around family/community engagement, special education instruction, English learner instruction and articulation strategies. CSBA supports funding to states, school districts, county offices of education and other providers of publicly-funded early childhood education with the flexibility to develop and offer professional development. CSBA also supports the dissemination of professional development best practices and research from the federal government to the field of early learning.

Family Engagement

Preschool is an integral part of the effort to ensure school readiness. Other essential components may include parent and family services, and health and social services. Preschool sites are well-suited to

becoming a point-of-contact for many of these other comprehensive services, especially preschool that is located on school sites. CSBA believes reaching out to parents is critical to the success of any school readiness effort: programs solely for children do not bring about systemic change. The federal government must support and incentivize local efforts to engage families and communities through linguistically- and culturally-appropriate trainings and other programs.

Standards and Assessments

Quality early learning experiences can open doors for children who might otherwise enter kindergarten lacking the necessary foundation to succeed in school. An integral component of that experience depends on the learning foundations and lessons being utilized. The state of California is in the process of finalizing the rigorous yet developmentally-appropriate Preschool Learning Foundations – CSBA supports the completed Foundations and the highly collaborative input process facilitated by the California Department of Education. If the federal government plans to create a set of uniform evidence based standards for three- and four-year-olds, CSBA recommends the following: that the standards be based on current research as well as culturally and developmentally-appropriate practice; include multiple and diverse stakeholders; reach a level of quality at or above that of the California Preschool Foundations; and that participation be voluntary. In addition, standards should be used solely as achievement benchmarks to inform instructional practice and evaluate programs. Early learning standards and assessments must not be used as a measure for punitive actions or sanctions.

CSBA supports federal support and resources to states so they may fully develop integrated longitudinal data systems that include the linking of early learning program data. An integrated approach would support alignment with K-12 schools and provide a greater knowledge base for the field about the children served in local programs.

In California and across the nation, policymakers and organizations are working to expand access to high-quality preschool programs in an attempt to provide preschool for all children. Many school districts are becoming more involved in building partnerships and providing programs to support preschool-age children. Because each school district, county office and community is unique, CSBA supports locally determined decision making around early education. The federal government's role in early childhood education should be to support states and local communities through the funding and dissemination of research and best practices, as well as programmatic resources which may be used at the discretion of the provider for, but not limited to: start-up costs, facilities, lesson materials, staff development and other ongoing program costs.

CSBA encourages the federal government to work in partnership with local governing boards of school districts and county offices of education as it examines the federal early learning landscape. There is a full continuum of activities school boards and district staff can pursue to support efforts to expand access to high-quality preschool programs. School boards are especially well positioned to be engaged in and provide leadership on statewide efforts to create, modify or expand quality preschool programs and access. Boards may also play a critical role in local efforts to increase the supply and quality of preschool programs.



Child Care System Quality Improvement Strategies In Durham, North Carolina

Durham's quality improvement efforts build on state-wide strategies and resources to offer a comprehensive and integrated early childhood system.

- Durham's Partnership for Children facilitates Durham's Early Childhood System through research-driven strategies to build and support a comprehensive system which provides a continuum of early childhood programs and initiatives to support children and families to be healthy and strong.
- As the convener of the early childhood system, Durham's Partnership for Children provides key leadership and support in the areas of: Program Evaluation and Monitoring, Technical Assistance, Fiscal and Contract Management, Community Education and Engagement, Research, Policy and Advocacy, and Collaborative Fund Development.
- Federal, state and local resources and strategies are maximized to ensure children will be ready for success in school including: Smart Start, More at Four, Child Care Subsidy, Early Head Start and Head Start, TEACH scholarships, child care technical assistance, WAGE\$ salary supplements and others.

Quality Improvement Aligned with Key Areas of Child Development

- Language and communication development
- Cognitive development
- Emotional and social development
- Health and physical development
- Approaches to learning

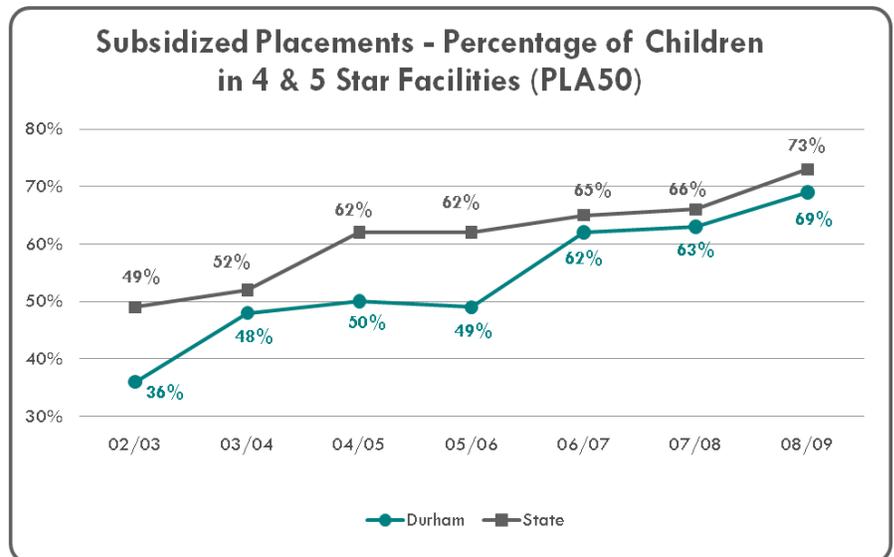
Durham Child Care Facts

- Nearly 24,000 children birth-5 live in Durham County
- Nearly half of young children (45.5%) live in low income families
- 62.5% of children are in households where parents or single parent is in workforce
- 338 licensed child care facilities in Durham. 127 centers and 211 family child care homes
- 57% of children in regulated child care are in 4- and 5-star child care settings
- 9,602 children birth-5 in regulated child care settings²

² Of the 9,602 children, 6,690 are in star rated child care centers, 912 children are in centers with a GS-110 license, 1,104 children are in license-exempt part day preschool programs and 896 are in licensed family child care homes.

Durham has made dramatic gains in the quality of child care over the past 10 years.

- The average star rating for licensed child care for all children has increased in Durham from **2.52** in 2001 to **3.61** in FY 08/09.
- In 2001, only **17%** of children receiving child care subsidy were enrolled in 4 and 5 star settings. In FY 08/09, **69%** of children receiving subsidy were in 4 and 5 star care.
- **10%** of children enrolled in regulated child care programs are enrolled in nationally accredited programs in Durham compared with 4% statewide.



Durham's Strategies to Improve Quality Child Care

Consultation, Technical Assistance and Training

- **Technical assistance, consultation and training to increase and maintain star ratings** - On-site technical assistance including observations, modeling/coaching, support groups, training, and non-cash incentives. Specialized curriculum training series and accreditation trainings.
- **Nutrition consultation** - Licensed Dietician/Nutritionist provides consultation services to child care sites using the Nutrition and Physical Activity Self Assessment for Child Care (NAP-SACC) tool to assess policies and practices, develop plans, review menus, provide educational materials for parents, and conduct staff workshops.
- **Mental health consultation and training** - Using the Center on the Social and Emotional Foundations for Early Learning (CSEFEL) model the following services are provided: assessment of children, child specific consultation for child care professionals, coaching, case management for families, and training for child care staff on social/emotional development and behavior.

- ***Inclusion support services*** - Consultation, technical assistance and training to child care providers and families who care for a child for whom there is a developmental, behavioral or social-emotional concern. Services include individualized consultation plans, emergency, rapid response services, trainings, and referrals and resource linkages for families.

Professional Development for Early Educators

- ***Professional development counseling*** - On-site professional development counseling and mentoring. Assists teachers in applying for college, accessing financial aid, and developing written professional development plans.
- ***WAGE\$ salary supplements*** – Education-based salary supplements that reward education and continuity of care offered each six month period the participant completes in same child care program while completing education.
- ***TEACH Early Childhood AmeriCorps program*** – Trained AmeriCorps members provide educational release time for teachers in non profit child care sites, implement early literacy and nutrition projects and enhance teacher-child ratios.

More at Four Pre-Kindergarten Program

Durham offers a high-quality pre-kindergarten program for eligible 4-year-olds through collaboration with private child care centers, Head Start and Durham Public Schools. Enhanced program standards set by the state More at Four guidelines have raised the level of quality for pre-kindergarten in Durham. More at Four program staff provide program monitoring, technical assistance, training, universal pre-k application process and community outreach.

Financing Strategies

Smart Start funds have been used to support and promote quality child care through collaboration with existing subsidy and scholarship programs.

- Match state More at Four funds to provide full cost of full day pre-k program.
- Bonuses for nationally accreditation and More at Four programs with BK certified teacher.
- Smart Start Scholarship funds may be used only for 3, 4 and 5 star care.
- Enhanced rates for high-quality infant and toddler child care.



Opportunities and Next Steps in Building a High-Quality Early Education System in Durham

- Early Head Start will provide opportunity to expand quality services to infants and toddlers.
- Regional and statewide planning around professional development for early childhood professionals will develop comprehensive plan/strategies.
- Build on trainings, education and technical assistance to focus teaching techniques on early literacy.
- Develop and expand strategies to work with children, families and child care professionals whose first language is not English to provide the services/supports that meet the needs of Durham's community.
- Engage community in developing and supporting additional high quality child care.
- Expand existing strategies and identify new strategies to support teacher education, compensation, benefits and retention.



For 15 Years, Durham's Partnership for Children, a Smart Start Initiative, has mobilized and unified the Durham community to create and support innovative and successful collaborative approaches to meeting the needs of young children birth to age 5 and their families.



Dear US Departments of Education and Health & Human Services,

Thank you very much for the opportunity to provide input into the collaboration between the two departments in regards to early childhood professional development. First of all, I would like to commend you for collaborating to best meet the needs of children, families, and educators. I have been working in the field for almost 12 years and have observed a lot of "talk" about early childhood professional development, but not enough action to really make a difference for the people affected. In my opinion, there are two primary problems with our current system.

1) There are too many programs that serve very specific populations (ex. Head Start, 4year old pre-k, subsidy for parents making very low incomes, developmental day programs). I would like to see a system that served all children birth to five. This would be beneficial to families for several reasons, but mainly children would have continuity of care without children being juggled from program to program based on their age, their family's income, or identifiable delays. Having one seamless system, would only benefit educators and their professional development as well. All educators, regardless of setting, would meet pre-service education requirements, be fairly compensated, and have access to high quality continuing education.

2) The second problem I see is that too much time and money is wasted on getting educators of young children to go "back to school", with little effort being made to make early childhood education a more appealing and financially rewarding career. Many educators will receive scholarships, but then decide to leave the field because they cannot support their family on their current income in the early childhood field. I suggest focusing your time and financial resources on developing a compensation system based on education levels that is adequate, accessible and dependable for all educators serving children birth to five. There is no reason why all children should not have access to a highly qualified teacher (similar to North Carolina Birth-Kindergarten licensed teachers)if compensation funds are available.

Lastly, I think we need to continue to emphasize the importance of early childhood education to other federal departments. High quality early childhood education (including high quality educators) can have many long-lasting effects in our society, including crime prevention, reduced health care costs, and economic development.

Thank you again for this opportunity.

Sincerely,

Randall Hardgrove

I am writing to provide comments about Understanding Pre-school – Grade 3 Structures. Specifically, I am writing to address the need for system alignment and the creation of a federal floor in federal early childhood programs which states will not be permitted to fall below.

Currently many differences exist between Head Start/Early Head Start programs and Child Care and Development Fund programs – both federal early childhood programs administered by HHS. These differences hinder partnerships and contribute to a fragmented early care and education system for low income families. Low income families need *affordable*, quality early care and education services for their children that are all-day, all-year to support parental employment. The following recommendations would help build an aligned system that provides this needed set of services for low-income working families:

1. Amend federal regulations in Head Start and CCDF to align parental eligibility.
2. Amend federal regulations in Head Start and CCDF to align performance standards.
3. Increase federal funding levels in CCDF to make funding in this program equitable with Head Start so that providers participating in CCDF can afford to meet improved performance standards.
4. Require Head Start programs to make services all day and all year to serve working parents.
5. Require states to ease access and improve retention of child care services for low income working families in CCDF programs. Appendix C of the attached Urban Institute report entitled, “Designing Subsidy Programs that Meet the Needs of Families” lists Key Steps Subsidy Agencies Can Take To Improve Subsidy Access and Retention.
6. Require states to adopt child care subsidy policies that support alignment between CCDF and Head Start at the state level. Specific recommendations for such policies are included in the attached policy brief done by the Center on Law and Social Policy entitled, "Head Start and Child Care Partnerships Policy Brief."
7. Require states to verify that quality improvement efforts do not adversely impact low income families’ access to affordable child care services.

Thank you.

Carol Burnett
Mississippi Low Income Child Care Initiative
Moore Community House
P. O. Box 204
Biloxi, MS 39533
phone) 228-669-4827
fax) 228-436-6605
email) cburnett@mschildcare.org
web) www.mschildcare.org

Listening and Learning about Early Learning: Family Engagement

Date: May 17, 2010

To: Office of the Secretary, Department of Education, Early Learning

From: Leticia Liera, Education Director and Head Start Director

Children's Learning Center in Jackson, Wyoming (Teton County)

Isabel Zumel, Assistant Director

Teton County Library in Teton County, Wyoming

Thank you for the opportunity to submit input on the important topic of improving early learning outcomes for children from birth through third grade. We understand that the focus on birth through third grade is a part of the President's commitment to a cradle through college and career agenda. We're pleased to share with you our local experience with promoting Family Engagement as a means to supporting the learning outcomes and academic achievement of young children, as well as a pilot initiative to encourage family engagement from K-12th grade, with the ultimate goal of students in our county completing post-secondary education.

Local Background

Located in Northwest Wyoming, adjacent to the Grand Teton and Yellowstone National Parks, Teton County Wyoming's natural beauty attracts millions of tourists annually and is home to a number of wealthy second home owners. The area is also home to a notable low-income Latino immigrant population, which has settled in Teton County to help meet the service industry demands from tourism and the affluent community settling in the area.

Since 2000, the Children's Learning Center has run Teton County's Head Start/Early Head Start program. The Head Start program has progressively served more monolingual Spanish - speaking children of immigrant Mexican parents. Through the efforts of Teton County Library, a Latino Services Network (LSN) was formed to coordinate services for the Latino population, who represent about 15% of Teton County residents. LSN has been a tremendous support for meeting the range of educational, health, mental health and social needs of the families and children of the Head Start/Early Head Start program.

Teton County Head Start/Early Head Start Experience

Today, Teton County's Head Start/Early Head Start program serves 100 low-income children and their families. Overall, 96% of children enrolled in the Head Start/Early Head Start program are Latino. Over 90% of the children entering our Head Start program are non-English speaking. In our community assessment, families expressed that:

- They value education;
- They believe that the most important skill for their child is English proficiency; and that once their child is able to communicate in English that they hope their child will gain other skills to successfully prepare for Kindergarten.
- They have a high level of concern about their lack of familiarity with the public school system and their inability to provide educational support to their children. With our Head Start families, this is often a consequence of feeling inadequate in supporting their child's learning because the average educational attainment of our Head Start parents is a 5th grade level and because nearly all of our children have immigrant parents from Mexico, parents lacking an understanding of and confidence in navigating the U.S. educational system.

- They have a great desire for their children to be successful and to finish high school
- Notably, not a single parent commented about attending college as a desire or goal for their child.

We are aware that accumulated evidence and research points to parent involvement as a one of the strongest predictors of children’s school success.³ Among our Head Start/Early Head Start families and other families with similar socioeconomic demographics, our challenges in Teton County are:

- (1) To build a strong culture of parent engagement in their child’s education that will carry into elementary school and beyond; and
- (2) To redefine the level of educational aspiration as completion of post-secondary education for Head Start families and, ultimately, all families in our community.

We have attained a level of success with developing the a culture of parent engagement among Head Start/Early Head Start families through intentional program design and a strong referral network to multiple family engagement programs targeting Latino families that our community has developed.

The Head Start/Early Head Start program builds a culture of active family engagement in the Head Start program through 2-4 parent and family engagement touchpoints per month. These touchpoints include participation in Policy Council Meetings; parent committee meetings with education on a pertinent child health and safety issue; home visits to assess and address child development, mental health, financial/social service needs and family dynamics; and interactive parent socialization meetings to learn home-based techniques to engage children’s learning through arts and crafts, play and reading. Parent meetings have over 95% attendance rates because of the trust and confidence our bilingual and bicultural Head Start staff have formed by demonstrating a committed interest in the success not only of their child’s development, but also of the entire family’s overall health and well-being.

To assist parents in developing stronger literacy skills and more confidence in supporting their children’s education, we work with multiple nonprofits and educational institutions – Teton Literacy Program, Latino Services Network, Teton County Library, University of Wyoming extension and Central Wyoming College, which provides free ESL, GED preparation and Adult Education basic classes. Parents are encouraged to obtain their GEDs to enhance their employment skills and to gain some experience with the U.S. educational system. On average, 72 parents each year participate in activities to advance their education.

Through a strong community referral network, we’ve successfully linked Head Start graduates to community and Teton County School District programs that specifically support ongoing involvement of Latino parents in their child’s education through the elementary years. For example, several of our Head Start graduates participate in Teton County School District’s “Exitto Para Todos” program targeting high-need children entering and in Kindergarten primarily

³ Weiss, H.B., Bouffard, S.M., Bridglall, B.L. & Gordon, E.W. (2009). *Reframing Family Involvement in Education: Supporting Families to Support Educational Equity*. New York, NY: Columbia University Campaign for Educational Equity.

from families with immigrant parents. Thirteen of our 36 Head Start children enrolled in the 5-week summer enrichment portion of the Exito program and six of the Head Start children are participating in the morning enrichment program in the current school year. We work to link Head Start children to the School District's Dual Language Immersion Program by encouraging the native Spanish speaking Head Start children to apply for this program, which is designed to bring together native English speaking and native Spanish speaking children for instruction. We encourage family enrollment in Teton Literacy Program's "La Puerta Abierta" program, which offers training and support to families with children enrolled in elementary school in navigating the school system and supporting parent-teacher communication. Finally, we encourage parent participation in the Parent Teacher Association. In the last year, one of the parents of a Head Start graduate was elected to the Elementary School's PTA.

Pilot Initiative: System of Education

Our local challenge of redefining the level of educational aspiration as completion of post-secondary education for Head Start families and, ultimately, all families in our community requires a long term strategy. Whereas the Children's Learning Center has focused on providing a successful educational beginning for low-income, at-risk children, Teton County Library has for the last four years provided a highly regarded College Prep program that has successfully assisted over 75 low-income Latino young adults in pursuing post-secondary education – Latino youth who previously thought post-secondary education was irrelevant or out of their reach. What both of our organizations realized was that we were serving the same target group with essentially the same goals of high educational attainment, but that without a system of continual engagement with parents and youth throughout the PreK through 12th grade, we would continue to do good work but only with a discrete group of youth at both ends of the K-12 grade spectrum.

Since the end of 2009, Children's Learning Center and Teton County Library have been developing a System of Education concept. The concept is to coordinate community organizations and institutions involved in education, human services and youth services to encourage active, ongoing parent involvement in their children's educational success, and to cultivate the expectation and create the family and community-wide conditions for every child in Teton County to complete post-secondary education. For our Head Start children and the numerous children in similar economic and social conditions it is education as a means out of the cycle of poverty.

One component of the System of Education will be supporting parents in learning educational engagement strategies with their children at home and through participation in out-of-school time programs as their children progress from elementary school through high school. A key focus will be parent involvement in helping their children successfully make transitions at critical times in their education (transition to Kindergarten, early Middle School years in determining class "tracks" in High School, and High School into Post-Secondary). A second component will be providing parents with the information to understand the processes and costs for post-secondary education and creating opportunities and incentives for parents to develop a financial strategy for their children's education.

Since the beginning of 2010, Children's Learning Center and Teton County Library have engaged and brought together Teton County School District, all area private schools, and a broad range of organizations and individuals in Teton County to launch the Systems of Education idea with an October 2010 parent conference. Dr. Manuel Escamilla, a leading regional speaker and

thinker on parent engagement, will be our keynote speaker. The conference will include concurrent English and Spanish language workshops by grade spans (PreK-K, 1st-4th Grade, 5th-8th Grade, 9th-12th Grade) that will give parents practical home and out of school time tools to support their child's learning and academic success. It will also include concurrent English and Spanish language workshops on financial strategies for post-secondary education.

While the conference will be advertised broadly for all parents and their children in the county, our intention is to work closely with Teton County School District and community organizations to help us identify parents and their children for whom this kind of information would be new or whose access to this type of information is limited. From our perspective, those who would particularly benefit include families with parents who are low-income, whose parents didn't pursue or complete post-secondary education, or whose parents didn't have post-secondary education experience in the United States. As such, we will be encouraging Head Start families and graduates of Head Start to attend the parent conference and participate in Systems of Education follow-up activities.

A reproducible product from the conference will be a parent engagement roadmap to help their child navigate school through the different grade spans to reach post-secondary education. We hope to be able to distribute this roadmap broadly even to families who aren't able to attend the conference. The roadmap will include information unique to Wyoming, such as post-secondary opportunities with Hathaway Scholarship eligibility and potential for earning college credit prior to college through Wyoming's community college system, as well as information for parents with children grades Pre-K through 4th grade about how they can work with their children to form the strong literacy and numeracy foundations that will ultimately strengthen their child's ability to take advantage of these Wyoming post-secondary opportunities. We anticipate that the roadmap information would have statewide applicability and see the potential for sharing this statewide.

Through the summer of 2010, we will continue to investigate parent and student engagement follow-up strategies in order to keep momentum in between what we anticipate will become annual parent conferences. For example, we have begun to investigate the Parent Institute for Quality Education (PIQE) model. We also hope to develop a longitudinal study of families who are involved with the System of Education conference and follow-up activities on a sustained basis.

Planning a Pilot Initiative: Head Start Re-Start

Children's Learning Center's Head Start technical assistance providers shared an interesting idea of a Head Start Re-Start, or re-establishing an educational and service relationship with Head Start graduates and their parents when they are in middle school to assess their needs and give children and their families a "head start" in pursuing post-secondary education.

The Children's Learning Center and Teton County Library are intrigued with this idea because of the opportunity to continue to a longer term relationship with Head Start families, and our observation that this critical middle school age⁴ is when we tend to "lose" the engagement of

⁴ ACT (2009). *The Forgotten Middle: Ensuring that All Students Are on Target for College and Career Readiness Before High School*. Iowa City, IA.

parents⁵, particularly among our Latino families. We see this idea as an important middle touchpoint between Head Start graduation and participating in Teton County Library's College Prep program. We see potential for CLC, TCL and other community organizations to collaborate on engaging Head Start graduates and their families in middle school and connecting them to TCL's College Prep middle school efforts, which we feel could be further developed in order to augment the success of College Prep efforts for high school students. In the next couple of years, CLC's first few classes of Head Start graduates will be middle school-aged. Towards the end of 2010, after the October System of Education parent conference, we are considering how we may implement a Head Start Re-Start with the Head Start graduates who are middle school-aged and target them for the parent and student Systems of Education engagement follow-up strategies that will continue in between annual parent conferences.

The Children's Learning Center and Teton County Library also see the potential for continued engagement with Head Start graduates and their families through 3rd grade by targeting them for Systems of Education engagement follow-up activities in between annual parent conferences and in coordination with existing Teton County School District and community group program initiatives targeted to children and their families in elementary grades.

Through these coordinated efforts, we are hopeful about building a System of Education in our county that weaves together parents, schools and community and encourages strong family involvement at all grade levels to support educational aspirations all the way to completion of post-secondary education.

Thank you again for the opportunity to share our local experience and pilot projects to encourage strong family involvement through the third grade and beyond.

For more information, please contact:

LetyLiera, Education Director and Head Start Director, Children's Learning Center
lliera@learningcenterwy.org or 307-733-1616

Isabel Zumel, Assistant Director, Teton County Library
izumel@tclib.org or 307-733-2164, ext. 101

⁵ Kreider, H., Caspe, M., Kennedy, S., Weiss, H. (2007). *Family Involvement In Middle and High School Students' Education*. Cambridge: MA: Harvard Family Research Project, Harvard Graduate School of Education.

Listening and Learning about Early Learning
Workforce and Professional Development
Department of Education
Office of the Secretary

May 17, 2010

Thank you for providing this opportunity for public discourse and input about early learning and what's important for us to consider as we re-set our national framework pertaining to young children and those who care for them. I am hopeful that under your leadership our country will come to a new intentionality about providing high quality early childhood that begins with considering the professional development needs of early childhood teachers and providers.

My name is Autumn Gehri and I am the Program Director of the T.E.A.C.H. Early Childhood® Wisconsin Scholarship program administered by the Wisconsin Early Childhood Association. We have operated our T.E.A.C.H. program for 10 years in Wisconsin, providing scholarships to more than 4,000 early childhood teachers, directors and family providers. We are proud to be a part of the national T.E.A.C.H. Early Childhood® Project providing scholarship for continuing credit-based education in more than 20 states for over 20 years.

In Wisconsin, the T.E.A.C.H. program is supported by CCDGB funding allocated through our biennial state budget process. Over the past ten years, Wisconsin's state budgets have included smaller and smaller pockets of funding for programs that improve the quality of child care. In fact, quality investments are less than one third of what they were ten years ago, from \$38 million in 2001 to \$11 million in 2010. Whereas Wisconsin early childhood advocates once proudly described state investment in quality early childhood programming at 16% of our CCDBG dollars, we now spend only the required 4%. In fact, although overturned in the current biennium's budget process, in 2007 our legislature limited the amount that could be allocated to quality initiative to the required 4%.

We've seen reductions in funding for our T.E.A.C.H. scholarship program from a high of \$6 million in 2002 to the current level of \$3.5 million. At the same time, college tuition is on the rise. In the past ten years, the cost of bachelor degree tuition has increased by approximately 84% and the cost of associate degree tuition has risen by approximately 63%.

The decrease in funding for quality initiatives has affected early education professionals, and the children and families across Wisconsin in measurable ways. A 2002 study by the Wisconsin Child Care Research Partnership found that 50% of children subsidized through Wisconsin Shares, our child care subsidy program, were receiving care by providers that received lower wages, were less likely to have a degree, and more likely to turnover than the Wisconsin average. In other words, children from low-income families, who could most benefit from high-quality child care, are less likely to receive it in Wisconsin due to inadequate funding of quality professional development initiatives. According to a series of workforce studies, Wisconsin has seen a steady decline in the

percentage of early childhood teachers with a higher education degree. In 2004, only 14% of Wisconsin's providers had a 4-year degree and less than 30% had a 2-year degree or higher. In comparison to other early education sectors like 4-year-old kindergarten, Head Start, and Birth to Three, Wisconsin's child care field lags far behind in terms of educational qualifications, compensation and infrastructure supports. This inequality of care across sectors is especially harmful as the majority of children in early childhood settings in Wisconsin are in child care. Moreover, according to a 2004 workforce study, the turnover of staff in child care programs in Wisconsin is higher than the national average. Child care providers leave the field at an alarming rate-sometimes as much as 40%- because of the inadequate professional development support and low compensation found in the field.

The alarming instability of the Wisconsin early childhood workforce creates a weak foundation for building quality early childhood initiatives. As you consider critical elements of early childhood quality: family engagement, workforce and professional development, standards and assessment, curriculum and environment, I urge you to construct your plan upon the strong foundation of a well educated and fairly compensated workforce. I ask you to consider the following in designing a new blueprint for quality childhood:

1. Create a set-aside within the reauthorization of CCDBG for early childhood professional development and compensation initiatives. Dedicated funding for these initiatives will create and support high quality early education professionals and will encourage them to remain in the field. Build upon the 20 year history and experience of the T.E.A.C.H. Early Childhood® Project.
2. Substantially increase the required investments in programs that enhance the quality of early education. In Wisconsin we are working hard to stretch our 4% of quality dollars, but have found year after year that it isn't enough to substantially improve quality for children and provide meaningful support to the workforce. Please increase the percent of CCDBG dollars that must go towards quality initiatives so that Wisconsin, and other states, can make noticeable, widespread improvements in the quality of early education programming.
3. Create incentives for states to exceed minimum investments in quality early childhood programming.
4. Require states to develop a comprehensive, coordinated plan to address the education, compensation and retention of the early education workforce, including child care, Head Start, early intervention and PreK.
5. Define elements of the Early Childhood Professional Development System that must be addressed within the plan for ELCF and require states to address issues of access, quality, articulation, diversity and inclusion, compensation parity and career pathways.
6. Identify federal funding for states to conduct an early childhood workforce study, using common, predefined data elements to culminate in a national body of data pertaining to the workforce.

There are approximately 30,000 people in our state engaged in providing care and education to children. Despite T.E.A.C.H.'s low turnover rate, just 11%, to date only 4,000 of these 30,000 people have benefited from the T.E.A.C.H. scholarship in Wisconsin – so you see, we've just begun! Eighty (80%) of these 4,000 are working in

programs that serve subsidized children, so we're also on a path to equalize educational opportunities. T.E.A.C.H. requires recipients to give back by requiring that they remain in their programs for a specified period of time after completion of their education. Turnover among program participants has been cut by over 66%. Children and families are benefiting by receiving care from more highly educated and consistent providers, teachers and directors. But so many others are yet to benefit from T.E.A.C.H., are yet to increase their knowledge in early childhood education, are yet to improve their care to children. Let's not wait any longer. Please recommend increases in the CCDBG quality investments requirement and establish a unique early childhood workforce and professional development set-aside.

Thank you for the opportunity to contribute to the design of a comprehensive national plan for improving quality in early childhood education. I am confident that under your administration we will celebrate a new day for children, their families and the field of early childhood education. I look forward to working with you in the future.

Respectfully submitted,
Autumn J. Gehri

Autumn J. Gehri
Program Director, T.E.A.C.H. Early Childhood® Wisconsin
Wisconsin Early Childhood Association (State Affiliate NAEYC)



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

May 17, 2010

Arne Duncan
Secretary of Education
Office of the Secretary
Attn: Listen and Learning about Early Learning-Public Input Meetings
U.S. Department of Education
400 Maryland Ave, SW
Room 7W219
Washington, DC 20202

Dear Secretary Duncan:

The American Speech-Language-Hearing Association (ASHA) is pleased to have the opportunity to respond to the U. S. Department of Education's (ED's) outreach efforts soliciting comments on Early Learning. ASHA is the professional, scientific, and credentialing association representing 140,000 speech-language pathologists (SLPs), audiologists, and speech, language, and hearing scientists qualified to meet the needs of the estimated 49 million (or 1 in 6) children and adults in the United States with communication disorders. With more than half of ASHA's members working in education settings, education is a major priority for the Association.

SLPs and audiologists provide services to children in both general and special education settings served under the Elementary and Secondary Education Act (ESEA) and those identified for services under the Individuals with Disabilities Education Improvement Act (IDEA). It is estimated that approximately 1.5 million students receive some form of intervention from these professionals. The high incidence of speech, language, or hearing disabilities in school-aged children requires a large, highly qualified pool of SLPs and audiologists to meet the needs of these students.

Good communication and literacy skills are fundamental to academic achievement, social well being, and lifetime opportunities. SLPs play important roles in ensuring that all children gain access to appropriate instruction in spoken language, reading, writing, and spelling. They provide assessment, evaluation, early identification, and intervention in language and literacy. There is a well-established connection between spoken language and reading and writing. Spoken language provides the foundation for the development of reading and writing. Spoken and written language has a reciprocal relationship that results in language and literacy competence. Instruction in spoken language results in enhanced written language, and conversely instruction in written language can result in improvement in spoken language. SLPs are often the first professionals to identify the root cause of reading and writing problems through a child's difficulty with spoken language. SLPs help children build the literacy skills they need to succeed in school and life.

May 17, 2010

Page 2

SLPs have extensive education and experience identifying and understanding individual differences in typical language development and disorders. This knowledge base, combined with proficiency using diagnostic-prescriptive approaches for assessment and intervention, is particularly valuable in school settings. Specifically, SLPs possess the foundational knowledge of language and its subsystems—phonology (speech sound systems), morphology (word structures), syntax (grammar), semantics (vocabulary), and pragmatics (social language use). Consequently, SLPs are instrumental in designing emergent and early literacy programs in phonological awareness, sound-letter correspondence, word recognition, and vocabulary development, which are fundamental to a child's ability to read. SLPs use their knowledge and expertise to prevent, identify, assess, evaluate, diagnose, and intervene with individuals confronted with literacy problems.

ASHA is pleased to submit the following comments/recommendations on Early Learning for the Department's consideration. Should you have questions about our comments, please contact Catherine Clarke, ASHA's Director of Education and Regulatory Advocacy, at 202-624-5953 or by e-mail at cclarke@asha.org.

Sincerely,

Tommie L. Robinson Jr., PhD, CCC-SLP
President



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

ASHA Comments on Early Learning Issues Addressed at the April/May - 2010 Public Meetings

Issue 1: Understanding Preschool – Grade 3 Structures

RECOMMENDATION:

Involve SLPs in the provision of services to children in the general education setting (under ESEA), including pre-referral and consultative services. These services are in addition to SLP's more traditional role in the provision of special education and related services (under IDEA). SLPs have a critical role to play in enhancing the speech and language skills of all children. SLPs are involved in the following ways:

- Provide information about developmental milestones so that families and teachers know what to expect at each grade. They help families and teachers understand the distinction between language disorders and language differences for children who speak more than one language.
- Assist teachers in general education classrooms by working with them to build spoken and written language skills that are essential for literacy and academic learning. The implementation of Response to Intervention (RTI) models is increasing across grades in school districts across the country. RTI uses multi-tiered instruction to improve student performance, prevent learning and behavior problems, and more accurately identify those students who may be eligible for special education services.
- Help teams understand the link between spoken and written language, demonstrate how language weaknesses affect literacy, and plan goals and strategies to address these weaknesses.
- Assess and evaluate children with speech and language problems using a variety of non-biased standardized and nonstandardized assessment tools.
- As part of a team, SLPs design, implement, and evaluate intervention programs for those students diagnosed with speech and language disorders.

Rationale: There is a strong connection between language, literacy, and learning. Effective communication skills are essential for literacy acquisition and learning in the primary grades. Speaking and understanding are the foundation for reading, writing, academics, and social relationships. Effective communication skills are directly linked to success in major life activities—thinking, learning, literacy, problem-solving, getting along with others. The ability to read and write advances higher-level language and communication in areas such as vocabulary, figurative language, and complex syntax.

Children with oral language disorders will likely have problems with reading, writing, academic, and social skills. They also may have behavior problems due to their inability to communicate

effectively with their parents, teachers, and peers. Students with good communication skills are more prepared to make significant contributions to society. They are better equipped to think creatively and solve society's challenging and complex problems.

Issue 2: Workforce and Professional Development

RECOMMENDATION 1:

Highly qualified, culturally competent personnel are needed to serve early learners from diverse cultural and linguistic backgrounds. Such personnel will help to reduce educational disparities among racially and ethnically diverse populations.

RECOMMENDATION 2:

Paraprofessionals and assistants must be directly supervised by highly qualified personnel. Parameters need to be identified that specify how such personnel should be trained, used, and supervised. States need to develop and adopt rigorous training standards and verifications of competencies.

RECOMMENDATION 3:

Implement effective recruitment and retention strategies to attract and retain highly qualified service providers to serve early learners.

Rationale: There is a growing need for qualified personnel to serve early learners. Availability of qualified personnel is essential to prevent substandard services to early learners and their families. We need effective pre-service and in-service preparation of personnel who work with children during their early years. Qualifications for service providers have been well established by professional organizations, state education agencies, and licensure boards.

Culturally competent services recognize the importance of culture, cross-cultural relations, and the adaptation of services to meet culturally unique needs. Such services are essential in the increasingly culturally and linguistically diverse education arena. According to the National Center for Cultural Competence (2007), the provision of culturally competent services in the health care field increases access and enhances the quality of services as well as reduces health care disparities among racially and ethnically diverse populations. Culturally competent services in education will likely have the same effect—increased access and improved quality of service for all children and their families.

Issue 3: Family Engagement

GENERAL COMMENTS: ASHA applauds ED for focusing on the issue of family engagement because early learners should not be served in isolation from their families. Family-centered services, designed to achieve successful child and family outcomes, are based on a set of beliefs and values that support family involvement in the child's development, and promote positive and successful adult-child and child-child communication interactions. With a family-centered approach, the family, rather than the individual child, is often the primary recipient of services.

Federal policies (IDEA 2004) and more than two decades of literature have recognized that traditional models of service (i.e., where child/client is the primary recipient of services) are not always appropriate for early learners because of the central role families play in all aspects of a child's care. Family-centered approaches foster closer alignment between family and professional decision-making and lead to earlier identification and service initiation.

RECOMMENDATION 1:

Families should be engaged in the assessment and intervention processes for their children. The degree of involvement should be based on the preferences of individual families, which may change over time.

Rationale: A key component of family-centered care is that services are individualized based on the concerns, preferences, priorities, and resources of each family and child. Respect and responsivity is central to a family-centered philosophy. Such an approach also acknowledges the right of families to make decisions based on what is in their child's best interest. Families have an opportunity to take an active role in the decision-making process concerning all aspects of service delivery, including screening, evaluation, assessment, goal setting, intervention, and transition planning.

A family-centered approach creates opportunities for the family to be involved in all aspects of the child's care, with individual families selecting their desired levels and types of involvement. Individual families vary considerably in their preferred level and type of involvement. A family-centered service approach should provide a continuum of options based on individual preferences, needs, and resources. Some families opt to be the key decision makers in directing or guiding the assessment and intervention processes. In these cases, the SLP and other service providers serve mainly as consultants to the family. Other families may take a more indirect role and prefer that SLPs and other specialists provide more direct services. The degree of involvement is dynamic and families' preferences may change over time. This likelihood of change underscores the need for SLPs to monitor family and child outcomes and adapt services and service delivery models on an individual and ongoing basis.

RECOMMENDATION 2: Assessments and intervention for early learners should be responsive to a family's cultural and linguistic differences. All assessments and evaluations should be conducted by a qualified provider, in a manner so as not to be racially, culturally, or linguistically discriminatory and should be provided in the child's or family's native language.

Rationale: A family-centered approach also means that services will be culturally and linguistically responsive. With the changing demographics and increasing sociocultural heterogeneity of the U.S. population (e. g., language, culture, race, gender, ethnicity, lifestyle, socioeconomic status, family constellation, geography), clinicians must be informed about and sensitive to how these differences can influence family/provider relationships and communication. Recommended practices as well as Federal policy (IDEA 2004) emphasize the importance of using materials and procedures that are culturally and linguistically appropriate and tailored to the needs of individual children and their families. In addition, effective services occur in a language or communication mode that is familiar to the family. This provision offers

support for the child's home language, which is important for children with communication delays.

In order to identify, evaluate, and meet the needs of all children, assessment and intervention must be provided in the child's or family's native language, particularly to address the increasing linguistic diversity found in the United States. Native language assessment is essential in order to conduct a valid and appropriate evaluation to determine the presence of a disability.

Services should be provided by qualified bilingual personnel or with the assistance of professional interpreters, when appropriate, to ensure that assessment and evaluation of linguistically diverse children and their families are conducted in a way that will yield the most accurate information. Language usage in the home environment by the child and family must be considered at all times. Testing materials that have not been developed to assess children in languages other than English carry an inherent linguistic bias, especially tests designed to assess speech and language. Assessments should be selected for individual children based on the norms and validity of the instrument. Close work with interpreters and translators is often necessary for center- and home-based services. Some programs use cultural guides or cultural-linguistic mediators to advance effective and satisfying communication between professionals and families.

Services are affected by the cultural and linguistic backgrounds of the family, child, and professionals. Like all clinical activities, services are inherently culture-bound because they reflect the beliefs, values, and interaction styles of a social group. SLPs need to recognize their own as well as the family's cultural perspective and how these factors might influence their perceptions of and interactions with others. Factors such as beliefs about child rearing, discipline, authority roles, and styles of communication, as well as views on disability and past experiences with health care professionals can influence the family's interactions and the decision-making process.

Issue 4: Standards and Assessments

RECOMMENDATION 1:

Include provisions (in legislation and regulations) that:

- Recognize the importance of providing assessments and evaluations in a child's native language. Language usage in the home environment by the child and family must be considered at all times. Assessment and evaluation tools should be carefully selected to eliminate bias.
- Highlight the right to culturally competent services that are responsive to cultural differences in family values and child rearing practices.
- Include timelines that avoid undue delays in assessments and evaluations.

Rationale: In order to identify, evaluate, and meet the needs of all children, assessments and services must be provided in the child and family's native language. This requirement is consistent with the ED's regulations in 34 CFR part 100, implementing Title VI of the Civil

Rights Act of 1964, which states that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance from the Department of Education.”

Native language assessment is the only valid way to determine the presence of a speech or language disability. Assessments and evaluations should be conducted in a way that will yield the most accurate information for all children regardless of the language they speak. Assessments and evaluations must: a) be conducted by qualified personnel; b) be administered in the child and family’s native language (by qualified bilingual personnel or with the assistance of professional interpreters); and c) be selected and administered so as not to be racially, culturally, or linguistically discriminatory. Assessment tools that have been developed to assess only English speaking children carry an inherent linguistic bias.

Assessments and evaluations should be administered in a timely manner. Lead agencies need to contact families and set-up appointments for the initial interview and/or evaluation following referral.

RECOMMENDATION 2:

SLPs and other service providers should base assessments and intervention on the curricular standards followed by the school system.

Rationale:

When SLP services are linked directly to the curricular standards, there is more integration between the classroom instruction and speech and language services. This integrated approach leads to greater generalization of skills. For example, if an SLP is providing vocabulary instruction, the targeted vocabulary words should be consistent with the subject-specific words used in the classroom. The importance of tying intervention services with the curricular standards also is evident for students in general education. For example, if an SLP and teacher are collaborating on a Response to Intervention (RTI) approach, they could use instructional strategies to help students meet goals established by the language arts standards (e.g., basic concepts, following directions, print awareness). More intensive and individual services could be provided for students who are having problems meeting curricular goals.

Listening and Learning about Early Learning Workforce and Professional Development
Department of Education
Office of the Secretary

May 17, 2010

First, I do appreciate an opportunity to provide input into the discussions focused on early learning and Professional Development for the Early Learning Workforce. I do support efforts to increase Federal Funding as that would be extremely helpful in providing additional Professional Development for the existing Early Learning providers in Wisconsin as well as in other states.

I am Barbara L. Schuler, the Education Director for Family, Consumer and Related Human Services Programs offered at the 16 Wisconsin Technical Colleges comprising the Wisconsin Technical College System. All 16 of our colleges provide students the opportunity to earn an Associate in Applied Science (AAS) degree in Early Childhood Education. All of them have enrolled T.E.A.C.H. Scholarship recipients into their programs and have seen many of those students complete their AAS degrees and move into a Baccalaureate Degree program.

The scholarships provided to existing Child Care providers through T.E.A.C.H. Early Childhood Wisconsin have enabled individuals that never thought they would be "college" students not only to enter a postsecondary educational institution but to do extremely well academically. The scholarship recipients have not only supported each other during their college experiences, but they consistently have been supported by student services staff, instructors, and administrators within the institution itself. I know that the Wisconsin Early Childhood Association has provided numerous statistical data documenting the impact of the scholarship effort on the recipients. However, I'd like to briefly highlight a few items from the technical college perspective: roughly 84,500 credit hours have been supported through scholarships; the average GPA of scholarship recipients is 3.65 (on a scale of 4.00); the average turnover rate of T.E.A.C.H. Scholars during their contract year is 2% as contrasted with the Wisconsin turnover rate for the child care workforce, which is 40%; and the demographic information on the scholarship recipients indicates a higher proportion of students of color than in your typical Wisconsin post secondary institution. The average salary of Child Care Providers has been consistently below the average salaries for other Associate Degree Graduates, so the increased compensation through the T.E.A.C.H. initiatives cannot be overestimated as an additional factor in retaining better trained individuals.

As more and more data supports the positive impact of education and training of staff on the quality of child care, it seems increasingly important to support any efforts to increase that quality in order to provide an optimum learning environment for children. T.E.A.C.H. Early Childhood Wisconsin scholarship initiatives have played a part in increasing the number of well-trained providers and thus increased the quality of child care in Wisconsin. By increasing federal funding for professional development (scholarship) efforts, we will see a more competent and highly trained workforce emerging. This ultimately will benefit all our children.

Again, I appreciate the opportunity to provide a technical college perspective on professional development, and I thank you in advance for reviewing my comments.

Barbara L. Schuler

Barbara L. Schuler, Ph.D.
Education Director
Family, Consumer and Related Human Services
Office of Instruction
Wisconsin Technical College System
4622 University Avenue, P.O. Box 7874
Madison, WI 53707-7874
Phone: 608/266-8887; FAX: 608/266-1690; Email: Barbara.schuler@wtcsystem.edu



College of Education
University of Nevada, Reno

April 27, 2010

Whitney Leathers
T.E.A.C.H. Early Childhood Nevada
680 S. Rock Blvd.
Reno, NV 89502

Dear Whitney:

Thank you so much for allowing me to serve on the T.E.A.C.H. Advisory Board for the state of Nevada. Since the Nevada Association for the Education of Young Children wrote and received the original funding, I have had the pleasure to watch the program develop from its inception. You and your staff do a phenomenal job of implementing the T.E.A.C.H. program throughout Nevada.

As research has shown time and again, an educated workforce in the early childhood profession leads to better outcomes for children. Teachers with formal education in child development and early childhood education know the importance of forming positive and nurturing relationships with the children in their care. Children who know their needs will be met by consistent and loving teachers develop coping, self-regulation, and social skills that help them get along better with peers and adults and get better grades in school. Children who experience success in their early years of development are much more likely to be successful in school and in life.

One factor that has undesirable effects on children in Nevada is the 46% staff turnover rate in the early care and education field. One reason for the high turnover rate could be related to the frustration teachers experience when they do not have the knowledge to help children be successful. That knowledge comes in the form of higher education. The T.E.A.C.H. program provides the opportunity to decrease the turnover rate in early care and education by providing financial support and incentives to obtain the higher education necessary to work successfully with young children.

Over the past few years I have encountered many T.E.A.C.H. participants who express their gratitude for the educational opportunities provided by T.E.A.C.H. I commend you and your staff for your outstanding work in developing and supporting early care and education professionals through the program. Your work directly and positively affects the lives of children in Nevada who receive early care and education services. Thank you all for improving the lives of Nevada's children by helping develop the professionals in early care and education. It is my pleasure and honor to work with all of you.

Sincerely,

Rebecca L. Carter-Steele
Infant Toddler Care Coordinator
University of Nevada, Reno
Child and Family Research Center
Early Head Start Program

**Early Head Start
Child and Family Research Center**
401 West 2nd Street
University of Nevada, Reno/0392
Reno, Nevada 89557-0392
(775) 327-5100
(775) 327-5866 fax



Carrie Paldi, Area Supervisor
P.O. Box 80237, Las Vegas, Nevada 89180
Phone (702) 871-0078 Fax (702) 222-9950
Cellular (702) 610-0340

May 10, 2010

To Whom It May Concern,

I am writing this letter in support of TEACH Early Childhood Nevada. I have had the pleasure of working with TEACH over the last few years in my capacity of area supervisor for Creative Kids Learning Center. We signed on as a sponsoring center in the beginning years of TEACH Early Childhood Nevada and have had the privilege of sponsoring multiple scholarship recipients over the years. Without the scholarships provided by TEACH, most of these dedicated and hard-working early childhood teachers and administrators would not be able to afford to further their education. The educational opportunities TEACH has provided has helped these individuals grow in both competence and confidence. Our partnership with TEACH has been a great benefit to our employees and we look forward to sponsoring more scholarship recipients in the future.

I must say that I believe this wonderful program would not be the success that it has become without the exemplary staff led by TEACH Program Director Whitney Leathers. Whitney and her amazing team are completely committed to helping scholarship recipients navigate their way through the educational process.

In closing, I would like to say that I feel blessed and privileged to be associated with TEACH Early Childhood Nevada. Being given the opportunity to help people change their lives for the better is an amazing gift, and I will be forever grateful.

Sincerely,

Carrie Paldi
Area Supervisor, Creative Kids Learning Center

UNIVERSITY OF NEVADA, LAS VEGAS



April 23, 2010

To Whom It May Concern:

I would like to extend my support to the T.E.A.C.H. program here in Nevada. As a sponsoring center, we recognize the importance of educating and supporting teachers in the field of early childhood education. The T.E.A.C.H. program offers the opportunity for new students to begin and complete their program of study while working in the field. Providing programs with teachers who have a strong background in early childhood theory and practice offers our children the quality education that they all deserve. Additionally, we have discovered that attrition rates for employment decrease when a teacher's educational background is expanded.

The scholarship program is critically needed here in Nevada and I am proud to be a part of the collaborative efforts deemed necessary to continue this all important endeavor. I recommend that available funding be dedicated to increasing teacher education programs across the United States. Please feel free to contact me at any time regarding the support of the T.E.A.C.H. program.

Sincerely,

Claire Tredwell, Ph.D.
Director , UNLV/CSUN Preschool
Lynn Bennett Early Childhood Education Center
4505 S. Maryland Parkway, Box 3004
Las Vegas, Nevada 89154-3004
(702) 895-1322 claire.tredwell@unlv.edu



To: Mrs. Sue Russell

From: Connie Zeller, Mark H. Dawson Child and Family Center Great Basin College Lab School Director
Lynette Macfarlan, Great Basin College Early Childhood Program Director

It is our distinct honor to write this letter of support for the T.E.A.C.H. Early Childhood Project. It has been our privilege to partner with T.E.A.C.H. Early Childhood Nevada to collaboratively provide financial support for 25 Early Childhood professionals in pursuing their Bachelor's Degree through a 2+2 program with UNLV. These experienced teachers are dedicated to the field of Early Childhood Education and are facilitating positive growth each and every day in the lives of the children and families they serve through their dedicated instruction. In addition to providing high quality instruction, these individuals are going the extra mile by obtaining professional development at Great Basin College. These students diligently work to further their educational goals in the field of Early Childhood Education by implementing cutting edge strategies and methods of instruction gained from the courses they complete.

While the field of Early Childhood Education has many rewards, appropriate financial compensation is not one of them. Therefore, without the assistance granted by T.E.A.C.H. Early Childhood Nevada, these educators would not receive the professional development needed to provide them with resources that help improve classroom instruction, and ultimately reduce staff turnover in the field of Early Childhood Education.

We wish to express our sincere appreciation for T.E.A.C.H. Early Childhood Nevada. The positive change within Early Childhood Education due to support from this program is immeasurable. Investment in our children at an early age will provide a crucial foundation for a positive educational experience overall, and for vibrant, self-motivated individuals within our society.

Best Regards,

Connie Zeller
GBC Child and Family Center Director

Lynette Macfarlan
GBC Early Childhood Education Program Director

ELKO MAIN CAMPUS
1500 College Parkway
Elko, NV 89801
775.738.8493 • fax 775.738.8771

ELY BRANCH CAMPUS
2115 Bobcat Drive
Ely, NV 89301
775.289.3589 • fax 775.289.3599

PAHRUMP VALLEY CENTER
551 East Calvada Boulevard
Pahrump, NV 89048
775.727.2000 • fax 775.727.2014

WINNEMUCCA BRANCH CAMPUS
5490 Klunzy Canyon Road
Winnemucca, NV 89445
775.623.4824 • fax 775.623.1812



Reno Association for the Education of Young Children

May 4, 2010

Katy Chapman
Confidential Assistant on Early Learning
U.S. Department of Education/ Office of the Secretary
400 Maryland Ave. SW Room 7W219
Washington D.C. 20202-5970

Re: T.E.A.C.H. Early Childhood Project in Nevada

Dear Ms. Chapman,

I am very grateful for the opportunity to offer my support and praise for the T.E.A.C.H. Early Childhood Project in Nevada. As a T.E.A.C.H. Advisory Board Member from the beginning, I have been fortunate to see firsthand the many contributions, benefits, and accomplishments that T.E.A.C.H. has provided the early childhood community in Nevada. The T.E.A.C.H. Staff has worked diligently to educate and recruit child care providers throughout the state, including extensive outreach in rural areas, to offer support and scholarships for education to all those interested. The ultimate goal for lucky recipients is a greater sense of professionalism, confidence in their abilities to provide higher quality of care, and the acknowledgement and support of their employers. I believe the reports indicate that this goal has been met and surpassed many times over.

The T.E.A.C.H. staff has also been instrumental in arranging quality training opportunities throughout the state, either on their own or in collaboration with other organizations. As President of the Reno Association for the Education of Young Children (RAEYC), I am personally very grateful for the time, efforts, and impressive organizational skills that the T.E.A.C.H. staff provided in the planning and implementation of a number of successful mini conferences in collaboration with RAEYC.

The benefits of the T.E.A.C.H. program for providers, including compensation and financial support for furthering education, act as great incentives for providers to choose to remain in the early childhood field, resulting in more consistent, quality care for children in Nevada. It is encouraging to know that many more children will receive a better start in life thanks to T.E.A.C.H.

Sincerely,

Margaret Oberg
President - RAEYC

May 1, 2010

To Whom it May Concern,

I am so proud to be a receipt of a T.E.A.C.H. scholarship. Obtaining a bachelors degree has been a lifelong goal of mine and I am very fortunate to be a student at Great Basin College pursuing this goal. I will graduate in the Fall of 2010 with an Associate of Arts Degree with an emphasis in Early Childhood Education.

Not only am I a student, I am a wife, mother of three, and part-time employee at the GBC Child and Family Center. It is not always easy to juggle home, work, and school, but the assistance that I am receiving from T.E.A.C.H. has helped tremendously and I am truly grateful.

As a student I have very much enjoyed my time in the classroom learning from a very dedicated faculty; this learning carries over into my position as a preschool teacher at the Child Center where I continue to learn and grow while working with fellow students and an experienced administrative staff.

I wish to thank those who so generously make the T.E.A.C.H. Scholarship available to myself and other students. Through the support of T.E.A.C.H., I am well on my way to achieving my academic goals, and hope that with my degree I will be able to make a meaningful difference in the lives of young children just as T.E.A.C.H. has for me.

Thank you again for so generously supporting the T.E.A.C.H. Early Childhood Project.

Sincerely,

Stacie Phillips

Listening and Learning about Early Learning – Workforce and Professional Development

I'd like to thank the U.S. Department of Education and the Dept. of Health and Human services for organizing these important Listening and Learning about Early Learning series. I'm Nancie Linville, Vice President at Clayton Early Learning and I have the privilege today to represent the 100+ teachers and child family educators from Clayton Educare and the 40+ coaches and researchers from our Institute.

Clayton Early Learning is a powerful model offering what very few other organizations can -- a continuous loop linking research, practice, and professional development that garners the most effective, proven methods for preparing young children for success in school. The three major components include:

- **Research**: The Clayton Institute researches, develops, and evaluates new and effective methods of training early childhood professionals and educating young children.
- **Practice**: On a daily basis at Clayton Educare, we employ research-based, outcome-focused early learning methods to close the achievement gap for over 400 prenatal to age five Head Start eligible children. Our main goal is for children to arrive at kindergarten prepared for academic success.
- **Training**: The Clayton Institute offers evidence-based training, coaching and education to better prepare early childhood educators. Our practices indicate that teachers and other early childhood professionals are more successful when coaching is part of their on-going professional development.

At Clayton, our current research to practice agenda is focused on answering the following questions:

What practices support building attachment and trust in young infants and help toddlers learn to regulate behaviors and emotions? What's the best way to engage four-year-olds in developing reasoning and problem-solving skills? How do teachers and families support the early literacy skills of children learning more than one language? How do we encourage parents to partner with schools? Which coaching methods work to engage teachers in increasingly effective practice? What are the key elements of effective early childhood leadership development? How do you build a credentialed and effective EC workforce? This model linking research with hands-on practice needs to be the foundation for teacher/leader preparation in early childhood.

Clayton Early Learning extends its work beyond our campus – through innovative public and private partnerships. As Colorado works to better understand the links between program quality and teacher preparation, we have forged strong partnerships with higher education to raise quality standards and push for systemic change in our early childhood professional development

system. I'd like to highlight 2 innovative programs:

1. Buell Early Childhood Leadership Program: Research recognizes the need for additional professional development of those in leadership roles. Clayton Early Learning partners with the Morgridge College of Education at University of Denver to create and offer a unique program. funded by the Temple Hoyne Buell Foundation. As the first of its kind in the nation, the statewide program offers graduate-level certification to a cohort of 20 fellows annually. The standards-based curriculum prepares students to address critical issues in the field by applying multiple leadership dimensions, including among others Pedagogical, Strategic and, Political. By the end of May 2010, 59 graduates of this unique leadership development program are on the forefront of resolving critical early childhood issues in Colorado – with another 20 fellows beginning the program in June.
2. Recognizing that the majority of early childhood teacher preparation is provided through community colleges – Colorado launched the Strengthening Early Childhood Professional Development through Colorado Community Colleges initiative. Fourteen of our sixteen community college Early Childhood Departments are working as a cohort (?) toward national accreditation or program improvement of their degree program from the National Association for the Education of Young Children. The Boettcher Foundation has funded this statewide initiative through Clayton Early Learning with \$750,000. The opportunity to impact Colorado's professional development system is immense – and most importantly – the impact for our children is immediate. Due to new state licensing requirements, enrollment in our early childhood classes at community colleges has increased 120%. These students – early childhood teachers by day, students by night – teach almost half of the 233,000 children in Colorado's licensed early care and education settings.

Clayton Early Learning urges the following action be taken:

- Aligning the intended outcomes and quality standards of EC systems at the federal level – Head Start, p-3 (Part C, Part B, etc.), Child Care Development Block Grant programs. States including Colorado are working within the disparate regulations of these programs to bring alignment to the greatest extent possible and we could use your help.
- Continue your emphasis on funding opportunities through the reauthorization of ESEA and another run at the Early Learning Challenge Grants to support teacher preparation models linking research to practice – giving increased hands-on experience in high-quality classrooms supported by master teachers/coaches.

U.S. Departments of Education and Health and Human Services,

We appreciate the opportunity to offer input to help inform your work about early learning. The comments below are in reference to the topic of *Workforce and Professional Development*. The importance of having a stable, educated workforce cannot be overstated and, fortunately, scientific research has made it easier to make the case.

We know that brains are built over time and that early experiences are essential to successful development. We also know that it takes a skilled and educated teacher to provide the quality care that will support and enhance that development. Thus it is *essential* to recruit, compensate and retain a high quality workforce. In North Carolina, the Child Care WAGE\$® Project addresses those very issues. WAGE\$ helps make the early childhood profession a more affordable and attractive option for educated teachers to choose and to stay. As director of this initiative, I would like to share some information and outcomes for WAGE\$ -- a program that truly supports the workforce and its ongoing professional development.

The Child Care WAGE\$® Project is an education-based salary supplement program for teachers, directors and family child care providers. The project offers an annual financial award, tied to an individual's level of education, in two installments -- each after a participant completes at least six months in the same child care program. To receive funding, the applicant must have a level of education on the WAGE\$ scale, which begins for teachers with four semester hours of basic early childhood coursework but expands to higher degrees. The program funds for the milestones in the educational system, like two and four year degrees, but also for progress toward those goals. Awards are offered for incremental steps through the system and the more education someone obtains, the higher award s/he can receive. Importantly, all levels below the Associate Degree in Early Childhood Education are funded only on a temporary basis and participants must advance up the scale to retain their eligibility. Once they have succeeded in taking that step, however, they are financially rewarded for it.

Through this increased compensation, WAGE\$ contributes to the reduction in turnover and to the increase of education for the workforce. In 2008-2009, the Child Care WAGE\$® Project provided salary supplements to 8,193 child care professionals for education earned and for their commitment to their child care programs. These teachers, directors and home providers worked in 2,986 different programs serving approximately 107,206 children. Other highlights include the following:

- * 53% of the WAGE\$ participants were people of color.
- * 75% of the WAGE\$ participants earned less than \$12 per hour from their employers.
- * WAGE\$ recipients earned an average six month supplement of \$754, or approximately \$1,508 more per year, as a result of their participation.
- * 97% of survey respondents stated that receiving a WAGE\$ supplement helps ease financial stress, with 83% saying they need the funds to pay basic bills.
- * 54% of the WAGE\$ participants were awarded for having an Associate's Degree in Early Childhood Education or higher on the supplement scale.
- * 31% of active participants with education below a Bachelor's Degree in Early Childhood Education submitted education documentation to show progress in school.
- * Only 15% of the WAGE\$ participants left their child care programs.
- * 98% of recipients indicated that WAGE\$ either encourages them to stay in their current child care programs or to pursue further education.

While these statistics show the outcomes WAGE\$ can have, participant feedback helps to further illustrate its impact. For example, one director said, "This program helps keep educated and knowledgeable teachers working with our children. If we want the children in our communities to become educated adults, then they must be taught by educated teachers. If you want educated teachers (who have paid a great deal for their schooling) to stay in a field with low pay, providing a WAGE\$ supplement helps encourage them to stay. WAGE\$ helps to keep decent, good, quality people interacting with and teaching the next generation. Thank you for all you have done and all you do!"

Child Care Services Association, a nonprofit organization dedicated to ensuring affordable, accessible, high quality child care for all young children and families, created and implements the Child Care WAGE\$® Project. It is funding collaboration between counties that have elected to fund the supplements with their Smart Start dollars and the North Carolina Division of Child Development and the Office of Early Learning, which pay for administrative costs.

Children deserve an educated teacher who stays. The workforce must have reasonable compensation and support before stability and ongoing learning can be expected. WAGE\$ is one model that helps to address the issues of compensation, education and retention.

Thank you for your time,
Allison Miller

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Allison Miller
Vice President, Compensation Initiatives
Child Care Services Association
PO Box 901
Chapel Hill, NC 27514
919-967-3272 (main office phone)
919-969-1930 (direct line phone)
919-967-2945 (WAGE\$-specific fax line)



NATIONAL CHILD CARE ASSOCIATION

1325 G Street NW, Suite 500

Washington, DC 20005

800-543-7161

Marie Darstein, Executive Director

mdarstein@nccanet.org

Written Input - Listening and Learning about Early Learning Tour

Addressing:

- *Understanding Preschool – Grade 3 Structures*
- *Workforce and Professional Development*
- *Family Engagement*
- *Standards and Assessments*

National Child Care Association (NCCA) would like to commend the U.S. Departments of Education and Health and Human Services for scheduling a Listening and Learning regarding Early Learning. NCCA was established in 1975 to represent providers across the United States on issues relating to providing education and care for working families. With a fragmented national early care and education structure, it is vitally important to consider the individual provider. The 40 largest providers in the US account for less than 5% of the entire delivery system, thus the bulk of services are provided by our members- the individual owners across the fifty states.

As the providers of education and care to working families on a daily basis, NCCA understands the issues around the Child Care and Development Fund and subsidized care, the Child and Adult Care Food Program, PreK programs, Quality Rating Systems, Kindergarten transitions, meeting state early learning standards, and professional development of staff- all aspects of early care and education we grapple with on a daily basis. NCCA believes it is crucial that these providers are included in all discussions regarding early learning, as we are the "implementers". Couple this with many, many years of experience and NCCA is poised to speak to what works and what doesn't in early learning, and more specifically, in the classroom.

We agree with much of what was discussed on the tours- particularly the importance of T.E.A.C.H. and other professional development supports. It is crucial that the early care and education workforce is provided resources to continue to develop and meet new standards. It is also imperative that the current workforce is not displaced, but rather retained as the cornerstones of programs and models for growth across the U.S.

We would also urge that all programs utilize a "mixed-delivery" model, so that children can access services in places that accommodate working families; in environments that have been transitioning children to kindergarten for years and can leverage strong, existing relationships with K-3 systems.

Finally, in all of these issues it is crucial to consider the ramifications of the implementation. Any of the four topics discussed have broad and varied implications to the daily workings of a classroom, to the staff, and to the children. National Child Care Association, in concert with our members across the USA, stands behind our 35-year commitment to quality early care and education and is ready and able to provide input into how to improve quality, implement programs, and meet new standards.



We are delighted to write today on behalf of the National Association of Early Childhood Specialists in State Departments of Education – the countrywide organization for state education agency staff members with major responsibilities in the field of early childhood education, from infancy through the primary grades. We commend the Administration for “listening” to our views and others in this process and we are pleased to share with you key principles and recommendations that guide our all of our efforts on behalf of the Nation’s youngest learners. Many these views have been expressed in previous recommendations to the administration. All may be found on our website at: www.naecs-sde.org/policy

THE OVERALL PICTURE – UNDERSTANDING P-3 STRUCTURES

Research shows us that learning progresses on a continuum beginning at birth, and that later learning is optimized when *built* on this foundational progression. The scope and sequence of education starts early and “pays forward,” not the reverse. In fact, the ultimate goal of the Administration’s efforts focused on education overall – the aim that all students will be college or career ready by high school graduation – cannot be realized without a firm foundation in the early years.

We also know that learning is multi-dimensional at all levels of the continuum. Birth through age eight is a critical period where the physical, social and emotional domains, along with a child’s approaches to learning, are vital and integral to their successful cognitive development. That said, a “whole child” approach – an intentional, developmental, and continued focus on these multiple domains of learning – is as foundational to success in high school as it is in preschool. This is true across all academic content areas and for all children. We also know that children with disabilities and those learning English are equally served by a cohesive, comprehensive and connected early childhood system, but they have unique and specific needs that should be addressed within that system.

We know that transitions are *always* important, and they are *particularly* important for younger learners. Effective transition should focus on building and sustaining relationships – children to teachers, families to providers, teachers and principals. Transitions should provide connections, continuity and consistency for children and families as they are entering and leaving services, programs and schools. There should be sustained developmental continuity in program and classroom practices. This continuity is both founded and served by effective transferring information about the developmental and learning status of the child.

Discrete laws, and their resulting offices, titles, and programs often result in the disjointed, segregation of services to children. We know this can be counter productive to the comprehensive nature of learning at all ages, and especially to the systemic character of early childhood development and learning. To assure an effective and cohesive learning spectrum from birth through age eight, the administration is urged to address the procedural issues of multiple programs in the service of individual children. This requires intentional, research-based transition practices among the programs serving children throughout the day, throughout the year, and along the learning continuum.

During times of limited resources, we must not fail to do the right thing because it might divert resources from “the other right thing.” An expanded role for early childhood education in the US Department of Education should and will complement the array of programs and services at the Department of Health and Human Services. States are modeling that this can work and the Early Childhood Study Groups, along with the collaborative efforts in the US Departments of Education and Health and Human Services are evidence that the path has been laid for successful collaboration at the federal level.

As the next step in building a comprehensive birth through age eight system of early childhood development services, we believe that the reauthorization of the Elementary and Secondary Education Act (ESEA) presents an important opportunity to tighten the focus on early learning. We support incorporating the Early Learning Challenge Fund (ELCF) within this authorization consistent with this vision. A birth through age eight approach within the ESEA reauthorization provides a fresh prospect to support and fund formal partnerships with school districts and early childhood programs. Incenting the alignment of high quality early education services in school attendance areas of high poverty and/or with school improvement needs is of particular importance.

Preparation and Development of the Profession

We know that teachers are paramount to the P-3 system—the quality of child experience and learning is directly linked to the professional in the classroom, and this is true regardless of auspice. Those who care for and teach young children require and deserve access to practical, evidence-based, age appropriate pre-service and ongoing professional development.

Effective preparation and development programs should be of sufficient intensity and should be content rich, focused and sustained over time. Research has shown that sequenced training targeted to specific practices leads to improvement in those practices, and that both child development and curricular content are important. Professional development is more likely to improve teaching and learning when it focuses on content-specific knowledge and practices.

Preparation and development programs should provide a pathway of professional progress along a continuum that results in increased knowledge, skills, and qualifications and commensurate compensation for the practitioners. A skilled, knowledgeable and competent professional is essential to the success of child development and learning and our early childhood professionals are due parity with similarly credentialed positions in the later years of schooling.

School leaders – principals in elementary and early childhood program directors – are also essential to successful early learning. Their preparation and development opportunities should

assure they are knowledgeable in child development and the attributes of high quality, age appropriate environments, and the content and practices that contribute to child outcomes along the birth-through-age-eight continuum.

Sustained, focused and content rich early childhood professional development for teachers and school leaders requires sufficient resources – both dedicated time and funding – in addition to the financial supports needed to assure the commensurate increases in compensation due competent, skilled professionals. Where appropriate, the federal government should support advancing the early childhood professional development. In addition, early childhood systems should require and provide funding for the inclusion of early childhood educators in school district professional development systems, as appropriate.

State early childhood administrators are also essential to a successful system of early learning, and could benefit from targeted training and professional development – we recommend a central mechanism in the US Department of Education for the provision of technical assistance, professional development and capacity building for the managers/directors of state early childhood education systems

Family Engagement

Families are not only the first and most important phalanx in a child's healthy development, but they are essential allies with educators in assuring success along the learning continuum. It is also important to recognize and cherish the rich diversity represented in the families with young children. Parents should be engaged, enabled, and empowered to optimize their children's health, learning and development from birth through college and career.

An important goal for family education is to increase knowledge about how adult actions affect child development and to empower parents and family members with the skills they need to support their child's growth and learning. Early childhood professionals should be trained in effective communication skills in order to convey key information to parents about their child's progress and learning. They should also be knowledgeable about adult learning in order to optimize this partnership with families.

Standards and Assessments

In our joint statement with NAEYC in response to the release of the draft common core standard for K-3rd grade we “affirmed that a standards-challenging and achievable, appropriate to children's development, and addressing each area of children's inter-related development and learning – are an important component of teaching and learning success for every child, and that standards can be a valuable part of a comprehensive, high quality system of service for young children.” A comprehensive, cohesive, and coordinated system of standards must align objectives and principles for child outcomes and expectations, but also for the programs serving young children and the professionals that serve those programs.

We urge you to pay close attention to the prolific study presented to the Congress and to the Departments of Education and Health and Human Services by the National Academies on early childhood assessment and the collection of information about young learners. We suggest that data collected to show school success and school improvement be expanded to include more than

school or learning outcomes. Of equal importance is data on community resources, teacher practices, home practices (parent education and engagement) and other systems measures. With this information, professionals and programs can have a more complete picture of a child's complete learning environment and use this information for important decision-making. The purpose of a well-designed, integrated and cohesive information system for early childhood connects standards, assessment and the consequent data to: teachers, so they can adjust and improve their practice to meet the specific learning needs of their students; parents, so they know how their children are doing and what to do at home to support their children's learning and development; and, back to the programs and system, so it can determine the adjustments and improvements needed to improve child development and learning.

PUTTING IT ALL TOGETHER

Our joint statement with NAEYC also highlighted that significant work remains to be done even with the best-written and most comprehensive standards. The four topics on the listening tour are interrelated and connected. There is still an urgent need for the development of appropriate and comprehensive curricula and assessments, professional development for teachers and administrators in effective practice and the resources to ensure that all children have opportunities to meet challenging and achievable expectations for learning.

We stand ready to partner with you in this endeavor and are confident that together we can assure a system that serves our youngest learners.



May 17, 2010

Office of the Secretary

Attention: Listening and Learning about Early Learning Meeting – Family Engagement

U.S. Department of Education

400 Maryland Avenue SW, room 7W219

Washington, DC 20202

Listening and Learning about Early Learning Committee Members and Staff,

Thank you for the opportunity to provide written comments on the important topic of family engagement addressed at the Listening and Learning about Early Education meeting held on May 4, 2010 in Orlando, Florida. This testimony will provide information about the special need for bilingual preschool education and family engagement programs for low-income Latino families. It also will describe how Joyce Bilingual Preschool has responded to this pressing need through an innovative and successful family engagement program

The Special Need for Bilingual Preschool Education and Family Engagement Programs for Low-Income Latino Families

Nationally, there has been growing consensus about the critical nature of early childhood education for children's long-term academic outcomes and in addressing the achievement gap. This is particularly true for Latino children, who face multiple barriers to school success. Research has found that children who are not reading at grade level by the end of first grade face eight-to-one odds of never catching up. With Latinos being Minnesota and the United States' fastest growing ethnic group, this poses a great concern for the future workforce of our state and country and emphasizes the strong need for quality early education.

Unfortunately, many Latino families in our community face significant barriers to school success – financial, linguistic and cultural factors that impede students’ ability to learn and parents’ ability to support learning.

- Parents cannot afford preschool tuition and/or are unaware of culturally and linguistically supportive preschool options.
- Parents frequently rely on informal networks of family, friends, and neighbors to care for their children. While these care networks may be culturally appropriate and safe, the caregivers often lack the academic or early childhood training to ensure school readiness.
- As recent immigrants speaking limited English, many parents are not aware of community resources that could help them. Furthermore, without an introduction or personal connection, many Latino parents do not feel comfortable accessing such resources.
- Parents living in poverty often work multiple jobs and are unable to transport children to preschool programs.
- When low-income Latino children enter elementary school, communication issues arise due to language barriers and lack of computer literacy or access. Schools increasingly rely on electronic forms of communication with families, but many parents do not have e-mail accounts or computers in the home.
- The current economic climate places more and more families in crisis situations, facing layoffs, foreclosure, and severe financial stress.

All of these factors combine to create a growing need for access to high quality bilingual preschool education and family engagement programs.

Joyce Bilingual Preschool

Joyce Preschool is located in Minneapolis, Minnesota, and has been providing quality early education to children and empowering families for nearly 45 years. In response to the rapidly growing Latino population and the scarcity of services for these new immigrants in the Twin Cities area, Joyce developed a Spanish/English two-way immersion preschool program with an emphasis on kindergarten readiness, family literacy and family engagement in 1995. This unique and successful dual immersion program is structured around equal numbers of English-speaking, Spanish-speaking, and bilingual children in each class. Instruction takes place in both languages, reinforcing native language while developing skills in a second language. The majority of the Spanish-speaking students at Joyce Preschool are children of recent immigrants who require scholarship assistance to attend. In a typical year, 40-60% of students receive

financial assistance, funded by private donations, on a sliding fee scale so that no child is turned away due to financial need. The teaching staff reflects the linguistic and cultural diversity of the students. Joyce Preschool is nationally accredited through the National Association for the Education of Young Children (NAEYC) and has received the highest rating (four-stars) through Minnesota's Parent Aware Quality Rating System.

One of the unique features of Joyce's two-way immersion educational program is the use of the child's first language as the medium of instruction. Teaching a child in his or her primary language, whether it is English or Spanish, will motivate the child to interact, socialize, play and, ultimately, to learn. By blending English- and Spanish-speaking students in each class, Joyce also supports second language acquisition. Because language is strongly linked to emotion and identity, a language-rich, multicultural educational setting allows preschoolers to thrive by developing positive self-images and strong self-esteem. Research suggests that learning languages has far-reaching cognitive, cultural and social benefits. Bilingual education can produce students with superior problem-solving skills. Based on a convergence of evidence it is recognized that supporting a Spanish-speaking child's native language early on and specifically developing early literacy skills in Spanish better supports later academic outcomes in English (*August & Shanahan, 2006; Christian, 1996; Cummins, 1979; Oller & Eilers, 2002; Rolstad, Mahoney, & Glass, 2005; Thomas & Collier, 2002; & many more, As cited by Lillian Duran, PhD. Minnesota State University Mankato*).

Joyce Preschool responds to the needs of low-income Latino families by providing:

- High quality early education that is also linguistically and culturally appropriate and affirming;
- Family support in addition to preschool education – particularly for new-immigrant or low-income Latino families;
- Financial assistance, transportation, and extended-day options to make preschool more accessible;
- Support for the transition to elementary school, particularly in terms of navigating the school system and addressing communication issues caused by language barriers and lack of computer literacy;
- Personal connections in order to access community resources;
- Additional support services for families in crisis; and
- Long-term planning and goal-setting to make high school graduation and higher education an option for their children.

In all these ways, Joyce Preschool is responding to the largely unmet needs in our community. Parents in the Latino community place a high value on wanting their children to be well prepared for kindergarten, as well as to be comfortable both linguistically and culturally in their new “home state.” However, they are also passionate about continuing to celebrate their culture and ensuring that their children remain grounded in that culture. Joyce Preschool is an environment that succeeds in doing both.

Joyce Preschool’s Family Engagement Efforts

As part of preparing students for success in kindergarten and beyond, Joyce Preschool recognizes the critical partnership between school and families and has developed extensive family engagement programming. Recognizing that low-income Latino families face additional barriers to educational achievement, Joyce Preschool developed *La Asociación de Padres de Familia*, a support and resource group for Latino parents, and Club Leopoldo, a family literacy program. Joyce also emphasizes school involvement for all parents, creating opportunities for parents to obtain more early education tools and take active roles in their children’s education through volunteering, take-home reading materials, and school events.

Asociación de Padres de Familia

The *Asociación de Padres de Familia* is a crucial program for many of Joyce’s immigrant families who are new to Minneapolis and struggling to access community resources. The *Padres de Familia* group anchors these parents in a safe and supportive setting where they can seek and share information in their native language about legal and economic concerns, education and family literacy, school choice, and concerns about discipline and/or violence in the home. The group is guided by the needs and concerns of the participants and holds monthly workshops to discuss relevant issues, connect with resources, and empower parents to play a major role in the education of their children and in the community. Group members take an active role in selecting topics and participating in the discussions, developing leadership skills and tools to support their students in school. In the process, these parents gain confidence and skills and become leaders in the community. Many of these parents subsequently join Joyce Preschool’s Board of Directors, become involved in their child’s elementary school education, and take leadership positions involved in changing educational policy at the city or state level.

Spanish-speaking community resource providers are brought in for monthly workshops, while a light dinner, childcare, and transportation reimbursement are available to support attendance.

The programming represents a collaborative initiative of Joyce Preschool with other organizations, projects and community resources. Workshops have included talks by Early Childhood Family Education (ECFE) about school choice and school readiness skills. *Casa de Esperanza*, a domestic violence program, has offered a workshop on appropriate discipline and another one on prevention and issues surrounding domestic abuse in the Latino community. Media Wise has spoken with the Latino parents about the effects of television and video games on children. A workshop on budgeting and financial literacy was offered by the Hispanic Chamber of Commerce. Additionally, a nutrition workshop provided both information and awareness of health issues, such as childhood obesity and how parents can make better food choices for their families. Partnerships that begin as *Padres* workshops often go on to become long term relationships between the school, the parents, and the community resources.

Club Leopoldo Family Literacy Program

Joyce Preschool places a strong emphasis on kindergarten-readiness and pre-literacy skills, which extend from the classroom to the families at home. Parent involvement is crucial in order for children to succeed in reading. Joyce developed Club Leopoldo (*leo* means "I read" in Spanish), a family reading program that promotes early literacy skills through family reading. Bilingual reading materials are distributed through family reading packets containing high quality books, other media such as tapes and CDs, and family activities tied to the classroom curriculum and designed to encourage the love of reading. While the completed activity sheets are often returned to school to share with the class, families can keep the books and CDs to build their own home libraries. This past year, seven Leopoldo packets were sent home with themes such as Around the World, Healthy Habits and Nutrition, and Our Five Senses. The feedback from Latino parents has been particularly significant. Some of these families had rarely read to their children in the past and owned very few children's books. Joyce Preschool also continues to expand the *Rincón de Recursos y Biblioteca*, a center with resources for Spanish- and English-speaking parents plus a lending library of bilingual media for the students to borrow and return.

Family Involvement

Joyce Preschool provides many resources and learning opportunities for parents and makes special efforts to involve families in their students' academic success. Many non-English-speaking parents are marginalized by traditional schools and mainstream school systems. Despite a desire to be involved, parents struggle with a school system where language is only the first of many barriers. Often it presents challenges in terms of cultural differences and

expectations for parents. Joyce Preschool strives to establish a foundation of parental involvement that our students and their families can then build on throughout their academic careers. The school makes specific efforts to involve families in their child's academic success, including the transition to elementary school and negotiating that system. Joyce holds approximately 24 family involvement events every year, including an Open House, beginning of the school year orientation, two parent-teacher conferences, five classroom cultural celebrations, several all-school gatherings, parent surveys, school choice informational meetings, and more. Joyce has created a wide variety of ways in which parents can get involved in their child's education, resulting in close to 100% of parents taking an active role through participating in conferences, volunteering in the classroom, and/or attending classroom celebrations.

Joyce Preschool Program Results

Joyce Preschool succeeds in achieving its core goal: preparing children for kindergarten. The school readiness scores of Latino children entering kindergarten in Minneapolis Public Schools (MPS) are by far the lowest for any ethnic group in the city. Only 36% of Hispanic children entering school met kindergarten readiness benchmarks in 2009. On the whole, 93% of students from Joyce Preschool graduate kindergarten-ready. Of that number, 88% of the preschool's Latino students are graduating school-ready, a level 50 percentage points higher than Hispanic MPS children overall, demonstrating the effectiveness of Joyce Preschool's teaching and family engagement programs.

At the same time, Joyce's family literacy and family engagement programs equip parents with the tools they need to help their children succeed in school. In the recent parent surveys:

- 100% of parents responded that they were satisfied or very satisfied with the work that Joyce is doing to prepare their children to succeed in school and lifelong learning;
- 97% of parents responded that they felt encouraged and welcome to take part in their child's educational experience;
- 100% of Spanish-speaking families reported that "the books and/or activities from Joyce encouraged them to do more reading-related activities with their child at home" through the Club Leopoldo family reading program; and
- 95% of parents whose children were going on to kindergarten said they planned to be involved in their child's school in the fall.

All of this shows not only an immediate impact of the program, but also the likelihood of continued involvement with their children's education.

Conclusion

Joyce Preschool helps children and parents, from the start, to overcome not only economic and linguistic barriers to success but also cultural divides that can otherwise work against successful outcomes. By developing dual language programming and culturally appropriate family support and engagement programs, Joyce has established itself as a community leader in providing students and families with the tools they need to break the interrelated cycles of school failure and poverty.

As Minnesota and the United States' Latino populations continue to grow, more schools and organizations recognize the need for programs and services supporting this population. Joyce Preschool is well-poised to provide leadership and guidance, demonstrated by sharing its two-way immersion model and family engagement programs with other communities, service providers and professional networks in our region. Many programs visit Joyce each year and seek information and resources, in many instances related to its work with Latino families and its success in supporting and involving them in the school. Joyce staff and board respond through trainings, site visits, materials, technical assistance and other support, collaborating with schools and agencies throughout Minnesota. Additional resources are being developed by Joyce Preschool for other programs wanting to better serve the growing Latino population including a:

- DVD/guide to involving low-income, Spanish-speaking parents in early childhood education programs modeled on the *Padres de Familia* program;
- Training workshop for Spanish-speaking professionals and para-professionals in conjunction with Resources for Child Caring (RCC) in the area of early childhood songs and activities in Spanish;
- "Joyce Model" description and research reference guide; and
- Resource list of bilingual books and materials for early education providers.

Joyce's outreach and model sharing work is aimed at addressing systemic disparities in service provision and the resulting achievement gap in low-income, new immigrant communities.

Thank you again for this opportunity to provide information about the special need for bilingual preschool education and family engagement programs for low-income Latino families. Please let us know if you have any questions and/or if you would like any additional information. We would be happy to further discuss Joyce Bilingual Preschool and our successful and innovative education and family engagement programs.

Sincerely,

A handwritten signature in black ink, reading "Laura Johansson". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Laura Johansson, Executive Director

Joyce Preschool

1219 West 31st Street

Minneapolis, MN 55408

612-823-2447, laura.johansson@joycepreschool.org



May 18, 2010

Honorable Arne Duncan
Secretary
US Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Honorable Kathleen Sebelius
Secretary
US Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Comments submitted by email to: earlylearning.comments@ed.gov

Listening and Learning About Early Learning

These comments are being submitted on behalf of the IDEA Infant & Toddler Coordinators Association (ITCA) regarding the request for comments on Early Learning as published in the Federal Register on April 21, 2010. ITCA represents the state and territory lead agencies that are responsible for implementing Part C, Infants and Toddlers with Disabilities, of the Individuals with Disabilities Education Act (IDEA).

We appreciate this opportunity to provide comments. ITCA is committed to ensuring that all young children, including those with disabilities and their families have the supports and evidence-based services necessary for each child to be successful in quality early learning settings within their community.

This statement from ITCA includes a discussion of the major fiscal challenges facing states and territories in implementing Part C of IDEA, recent relevant state survey data, and several recommendations related to the Administration's Early Learning initiatives.

Significant Fiscal Challenge Facing Implementation of Part C ITCA must take this opportunity to discuss the fiscal challenge that our members are facing that directly impact their ability to continue to ensure early intervention services for young children with disabilities and their families. As states and territories continue to face a growing and significant fiscal crisis, there is increasing difficulty in continuing to participate in the federal Part C program.

A major part of this crisis is the lack of federal investment in Part C. The current federal Part C allocation is \$4.9 million lower in actual funding in FFY'10 than its highest funding level of \$444 million in FFY'04. Despite this continuing lack of federal financial investment in Part C, data gathered from 31 states and territories in April 2010 indicate that at least \$2.5 billion is spent on early intervention in those states. For eleven of the states, the federal Part C funds provide less than 20 percent of the state's entire early intervention budget. Of the funds that were identified by those 31 states and territories, 31% were from federal sources with 56% from state fund sources with the remaining 13% of funds accessed at the local level. The number of

children receiving services under Part C continues to increase annually going from 284,170 children in FFY'04 to 342,544 in FFY'08.

ITCA Survey Data ITCA periodically surveys its members on topics significant to the implementation of the Part C Program. Data from these surveys can be found on our website at www.ideainfanttoddler.com ITCA provides some data relevant to the topics including in this request for comment below.

- In 2009, thirty-six states responding to a survey on family involvement report as follows:
 - 44% reported the state has a State Interagency Coordinating Council (SICC) Committee responsible for working to ensure family involvement;
 - 72% reported that families are employed as service coordinators or family liaisons in the state;
 - 94% indicated families participate on committees and task forces other than the SICC
 - Others roles of families reported including participation on state monitoring teams, providing training to other parents and to early intervention practitioners and as providers of parent-to-parent support.

- In 2009, thirty-one states responding to a survey on personnel issues report as follows:
 - 52% reported the state has a credential/certification in addition to required professional licensure;
 - 47% indicated they have developed a plan with institutions of higher education to address personnel preparation and shortages;
 - 100% reported professionals are required to get continuing education units specific to EI; and
 - 50% indicated the paraprofessionals are required to get continuing education units specific to EI.

- In the same survey, twenty-six states responded to a question asking if paraprofessionals were used for specific disciplines reported as follows:
 - 73% states report using paraprofessionals for Physical Therapy;
 - 73% states report using paraprofessionals for Occupational Therapy (COTA);
 - 54% states report using paraprofessionals for Speech Therapy (assistant);
 - 73% states report using paraprofessionals for special instruction; and
 - 46% states report using paraprofessionals for service coordination

- In addition, 50% of the 32 states reporting indicated they have developed web-based training modules in topics including developing and implementing an IFSP, transition and procedural safeguards.

Recommendations ITCA supports the Administration's commitment to enhancing Early Learning Opportunities for all young children and their families. In order for children birth to age three with disabilities to be successful in their community early learning settings, evidence-based services and supports must be available to them and to their families. With this goal in mind, ITCA recommends that as policy and funding decisions are made:

- Adequate and significantly increased federal funds be made available for Part C and Preschool 619 programs under IDEA;
- Any additional modifications to the already significant data collection requirements be deferred until reauthorization as implementing these changes diverts scarce resources, both fiscal and human, from services to children and families;
- As standards and assessment policies are developed for programs serving all young children, careful consideration be given to align any new efforts with the existing child outcomes systems states have implemented in response to the State Performance Plan requirements under IDEA 2004. All states have implemented costly systems of assessment to respond to required child outcome indicators for children with disabilities ages birth to age three and three through age five years.
- As important federal investments in state and local efforts such as Race to the Top, Investments in Innovation, State Longitudinal Data Systems, and Promise Neighborhoods, ensure that these important federal investments are available to Part C lead agencies and local early intervention programs. ITCA recommends that RFPs require participation of Part C lead agencies and specify how available funds will benefit and be allocated to efforts related to young children with disabilities and their families.
- Revise early learning state council requirements (under Head Start Reauthorization and ARRA Head Start RFP) to ensure that both a Part C AND a Preschool 619 state representative be required on the council. This will help ensure that the needs of all young children with disabilities are addressed in states' early learning efforts.

Thank you for opportunity to submit comments. As always, ITCA is available and willing to provide any additional information or clarification that may be needed. Feel free to contact:

For additional information and to discuss these strategies, contact:

Brad Hutton, ITCA President bjh08@health.state.ny.us
 Sharon Walsh, ITCA Government Consultant walshtaylo@aol.com
 Maureen Greer, ITCA Administrative Consultant ideaitca@aol.com



To: The United States Departments of Education Health and Human Services for "Listening and Learning About Early Learning" Meetings
From: The National Center for Learning Disabilities
Date: May 18, 2010
RE: Testimony in Support of the Need for Implementation of Pre-K Response to Intervention (RTI).

The National Center for Learning Disabilities (NCLD) is a not-for-profit organization that advocates for the 15 million individuals with learning disabilities as well as for those children most at-risk for being identified with a learning disability. For the past ten years, NCLD has shaped policies and developed resources and tools to strengthen early childhood programs. Working in partnership with practitioners and researchers, we have sought to increase the capacity of teachers and parents to understand young children's learning strengths and needs; and, to take action to support their readiness for instruction as they enter school. We believe that early recognition of learning problems, combined with timely, effective intervening services to address such problems, is a mission-critical component of any successful early childhood program.

For the past eight years, NCLD has led national efforts to develop and implement a [research-based early screening program](#) and advocate for [improved identification of struggling and at-risk preschoolers](#). Through national partnerships with early childhood organizations, state agencies and local providers, NCLD brings [research-based strategies](#) to parents, early education professionals, and child care providers to help prepare children to learn to read and write. Our work is built on the research foundation showing that:

- Identifying struggling learners as early as pre-school has a direct impact on future opportunities such as enhanced academic attainment; college progression; improved health; and higher wages. Societal benefits are more efficient education systems; higher tax payments by participants; lower reliance on welfare; and lower rates of criminal activity. Prior research has found that the societal benefits alone exceed the costs of the programs (Belfield et al., 2004; Karoly and Bigelow, 2005; Reynolds et al., 2002)
- Failure to develop basic reading skills by age nine predicts a lifetime of illiteracy. Unless these children receive the appropriate instruction, over 70 percent of the children entering first grade who are at risk for reading failure will continue to have reading problems into adulthood. (Carnine, 2003)
- Early identification of children at-risk for reading failure coupled with the provision of comprehensive early reading interventions can reduce the percentage of children reading below the basic level in the fourth grade (e.g., 38 percent) to six percent or less. (Lyon et al., 2001)
- ...[effective] pre-schooling causes a 12% fall in the rate of special education identification (Belfield, 2005) and lowers special education placement for pre-school children as far as grade 8. Special education placement rates are 38% lower for LD. (Conyers et al., 2002)
- Early childhood educators with more professional preparation provide more developmentally appropriate, nurturing, and responsive care and education experiences for young children. (Professional preparation includes university and college course work as well as the pre- and in-service training and technical assistance that early childhood staff receive.) (NAEYC March 2007).

Since 2002, NCLD has advocated in policy and practice to advance a comprehensive framework — Response to Intervention (RTI) — through which to deliver the kind of evidence-based screening, interventions, progress monitoring and tiered instruction which decades of research has shown to be effective for children who struggle to learn. In 2007, with private funding, we developed the RTI Action Network (www.rtinetwork.org) as a way to connect practitioners, researchers and policymakers with the information needed to implement RTI frameworks in pre-K through high school.

While RTI was designed for K-12, there exists research to suggest that an RTI approach can be beneficial in the years before kindergarten. By co-developing the Recognition and Response Observation Rating Scale (RRORS), supporting Pre-K RTI through our RTINetwork.org website, developing and launching the Roadmap to Pre-K RTI and providing mentoring to school leaders throughout the U.S. we are providing the field with the most recent data and resources to explore and implement this important initiative in early education.

Evidence of the Need and Effectiveness of RTI

Intuitively, we understand that the sooner we intervene to help children to learn, the greater impact we have on the quality of their learning. This intuitive knowledge is supported by a growing body of evidence that suggests that the quality of early childhood programs is an important determinant of children's social, language, and cognitive outcomes, as well as their school readiness skills. For several decades, the quality of early care and education has been at the forefront of research in the early childhood field.

Several recent publications have affirmed this earlier work, noting that, for example, children's readiness for school is made up of multiple components and shaped by many factors, including children's environments and early experiences (National Governors Association, 2005; Rhode Island KIDS COUNT, 2005; entire issue of *The Future of Children*, 2005, Vol. 15, No. 1). Other conclusions offered by these sources include: (1) experiences during the first five years of life provide the foundation for language, reasoning, problem-solving, social skills, behavioral and emotional health; (2) school readiness efforts must recognize that young children vary in their early experiences, skills, knowledge, language, culture, and family background and that gaps in school achievement among children from various groups already exist by the time they enter kindergarten; (3) families help prepare young children for school when they nurture, protect, and provide them with opportunities to learn and explore; and (4) schools improve readiness of young children by making connections with early care and education programs and by creating policies that promote smooth transitions to kindergarten.

The transition to kindergarten increasingly is viewed by early childhood experts as a key component of school readiness, largely because school entry is a critical time in children's development and a primary influence on their school careers (Pianta & Kraft-Sayre, 2003). The National Governor's Association (2005) recommended that local schools develop communitywide transition plans in collaboration with pre-kindergarten and kindergarten teachers, Head Start personnel, child care providers, administrators, parents, and community members.

In 1991, national attention was focused on school readiness through the establishment of six national education goals, with the first one being "All children in America will start school ready to learn" (National Education Goals Panel, 1991, codified in the Educate America Act, P.L. 103-277). Goal one was eventually defined as including the following dimensions of school readiness, which have become widely accepted in the early childhood field: physical and motor development, social and emotional development, approaches toward learning (e.g., creativity, initiative, attitudes, task mastery), language, cognition, and general knowledge (Kagan, Moore, & Bredekamp, 1995; Love, 2001; Meisels, 1999). In 1998, the National Education Goals Panel further defined school readiness by noting the need for *ready*

schools—the notion that it was not sufficient for all children to be ready for school, but also that schools must be ready to meet the needs of all children.

Policies that emphasize early literacy and children's academic preparation as key goals during pre-kindergarten appear to be changing the definition of school readiness. In 1998, for example, specific skills in the areas of language, literacy, and numeracy were legislatively mandated to be part of the Head Start Child Outcomes Framework to enhance children's school readiness skills. The No Child Left Behind Act (NCLB) of 2001 included provisions for an early literacy initiative—the Early Reading First Program—which targeted low-income students in pre-kindergarten at risk of reading failure when they enter kindergarten. In conjunction with standards movement, the Good Start, Grow Smart initiative (<http://www.whitehouse.gov/infocus/earlychildhood/toc.html>) has prompted the creation of new state standards to align child outcomes with the curriculum and to assess children's school achievement in pre-kindergarten.

Early learning standards, guidelines, and interventions resulting from these policies likely will influence the way in which we monitor children's progress and evaluate program effectiveness in the future. It is conceivable, for example, that as early childhood programs address early learning standards related to literacy and other academic content areas, the number of young children who exhibit learning difficulties during pre-k may increase. This in turn could lead to an increased need for an early intervening system to ensure that all young children make a smooth transition to kindergarten and experience early school success.

Pre-K Response To Intervention (Pre-K RTI) is the tool needed to ensure this smooth transition and to promote early school success for all children. Not only does the emerging empirical evidence from recent research suggest that RTI is effective for identifying children at risk for learning disabilities and for providing specialized interventions, but this model for school-age children emphasizes pre-referral prevention and intervention of learning difficulties.

Pre-K RTI Model

The major premise of RTI is that early intervening services can both prevent academic problems for many students who are having learning difficulties and determine which students actually have learning disabilities versus those whose underachievement can be attributed to other factors, such as inadequate instruction. In addition, because RTI includes an emphasis on the quality of the general education curriculum and instruction, the model offers potential benefits to every student and not just to those who experience some type of learning problem.

In order for Pre-K RTI to work it must be implemented rigorously and with integrity. Only then will parents and school staff know the type and intensity of intervention needed for each student to succeed. The features of Pre-K RTI that are shared with RTI for school aged children include:

- Tiered instruction and intervention
- High quality classroom instruction
- On-going student assessment and progress monitoring
- Family involvement

The overriding structure of Pre-K RTI is a tiered approach to meeting the needs of children. Tiered approaches allow the intensity of supports and services to increase as the intensity of the child's needs increases. Tiered approaches are strategic because the intensity of time, effort, and resources matches the intensity of specific needs shown by the child. The most widely used RTI model for supports and services includes three tiers. Each tier is briefly described below.

Tier 1. Tier 1 provides a foundation of high quality early childhood programming for all children. Elements include a comprehensive, evidence based curriculum and intentional teaching. Universal screening, assessment, and progress monitoring are used to obtain baseline information about each child and to determine whether a child would benefit from additional support.

Tier 2. Tier 2 consists of more intensive learning opportunities that are provided to large or small groups of children who have been found to need additional support. Progress monitoring is conducted more frequently and is used in conjunction with the collaborative problem-solving process to guide and refine interventions. Parents and family members are included as part of the collaborative problem-solving team.

Tier 3. Tier 3 focuses on the children who do not make expected progress through the support of Tier 2 interventions. In Tier 3, interventions are more intensive and individualized and may be conducted one-on-one with the child. Progress monitoring and the collaborative problem-solving processes are used to guide decisions about the child's program.

The RTI process has the potential to limit the amount of academic failure that any student experiences and to increase the accuracy of special education identification. Its use may also reduce the number of children who are mistakenly identified as having learning disabilities when their learning problems are actually due to cultural differences or lack of adequate instruction. Information and data gathered by an RTI process can lead to earlier identification of children who have true disabilities and are in need of special education services.

Across the United States schools and programs are successfully implementing the Pre-K RTI. Among them are four program highlighted in NCLD's 2009 publication, *Roadmap to Pre-K RTI: Applying Response to Intervention in Pre-K Settings*, they are: Recognition and Response program led by the Frank Porter Graham Institute, implemented in Maryland and Florida; The Literacy Partnership, in Washington, D.C., funded by the U.S. Department of Education; the Rockford Early Childhood Program, in Illinois; and, the Center for Response to Intervention in Early Childhood (CRTIEC) with consortia partner states Kansas, Minnesota, Ohio, Oregon. All are excellent examples of what early intervention does to improve the educational forecast for young learners and they highlight how RTI can be adapted for implementation in a variety of pre-K settings. Data from their participation in RTI demonstrates "markedly greater improvements," "positive teacher feedback," and the "successful integration [of] children from a self-contained special education classroom into the general pre-kindergarten classes."

Recognition and Response (R&R) – was developed by a research team at the Frank Porter Graham Child Development Institute (University of North Carolina at Chapel Hill), with funding from a private foundation and the federal government. The idea behind R&R is that early education programs should provide core, strategic, and sometimes intensive supports to help all young children learn, and that decisions about instructional supports are based on children's level and rate of progress. R&R is designed to help early childhood teachers gauge the effectiveness of their instruction for all children as well as to recognize individual children who show signs of early learning difficulty and respond in ways that help them experience early school success. R&R is based closely on the principles of RTI, but adapted for a younger population of children prior to kindergarten entry. The instructional principles that serve as the foundation for R&R and RTI are consistent with the current emphasis in early childhood on high quality curriculum and instruction, the importance of intervening early using research-based approaches, and the need to connect teaching and learning processes to positive child and family outcomes.

A study has been conducted to evaluate the first implementation of R&R in community-based early childhood programs serving 4-year-old children in Florida and Maryland. This multi-site study involving 24 teachers and more than 300 children was designed to evaluate whether teachers find the R&R system useful and are able to implement it with fidelity. It also evaluated the preliminary effectiveness of R&R on classroom practices and children's outcomes in language and literacy. Components of the study included: (1) professional development, including weekly consultation sessions, bi-weekly community of practice meetings, and collaborative problem-solving; (2) universal screening for all children and progress monitoring for target and comparison children; (3) Tier 2 small group language and literacy interventions for targeted children; and (4) evaluation data, including social validation, implementation fidelity, and child and classroom outcomes. A second study is underway to evaluate the additive effects of a Tier 3 intervention focused on providing children with more intensive and individualized supports and to compare various assessment approaches used in universal screening and progress monitoring. A third study will be launched to develop and evaluate adaptations of R&R for Latino DLLs.

The Literacy Partnership – is a three-year program that was funded by the U.S Department of Education as an Early Reading First project. It has completed its third year of implementation at three public charter schools in a mid-Atlantic urban area which serves 3- and 4-year-old children from low-income families. A significant number of the children in the project are English language learners. Throughout the implementation period, data have been collected and analyzed to document both changes in child and teacher performance.

- Initial results indicate that both Tier 1 and Tier 2 activities have been successful in improving children's performance to meet pre-determined Spring benchmarks on both norm-referenced and criterion-referenced measures of language and emergent literacy.
- In addition, in comparison to a group of non-participating children within the same schools, the Literacy Partnership child participants showed markedly greater improvements on several measures of emergent literacy and receptive vocabulary.
- On measures of teacher performance, significant improvement was observed on the Early Language and Literacy Classroom Observation (ELLCO) between pre-test and posttest administrations, however, it should be noted that a control group is not available for teacher measures comparisons.

Teacher feedback on the professional development has been positive. Many teachers have also commented on their appreciation of the ongoing in-class support provided by the literacy mentors and the speech-language pathologists.

Rockford Early Childhood RTI Program –The Early Childhood Program offers pre-Kindergarten classes to children ages 3 to 5. These pre-K classes are housed in 9 public elementary schools, Roosevelt Community Education Center, Dennis Early Education Center, Fairview Early Childhood Center, two local childcare centers, and one Head Start center. The Rockford model includes use of three research-based curricula to support academic and behavioral goals. These curricula are: High/Scope Preschool Curriculum, Second Step Violence Prevention Curriculum, and Woven Word dialogic reading and social-emotional development program.

- The program has found success in implementation of the Tier 1 strategies of research-based curriculum and assessment. Rockford student achievement data show proficient ratings ranging from 86 to 93% across the Learning Areas of the Illinois Early Learning Standards.
- The data team problem-solving process is showing signs of success in supporting student progress by providing educators with specific areas in need of improvement, helping to focus their planning and problem-solving discussions.
- Another sign of progress and positive change is that one elementary school site has successfully integrated 38 children from a self-contained special education classroom into the general pre-kindergarten classes. During the 2007-2008 school year, the resource teacher, speech-language

pathologist, and special education paraprofessionals provided additional instructional, including small group and/or individual activities. Results of this pilot showed that only 3 of the 38 students required an evaluation by the diagnostic team and received special education eligibilities during that school year. Of the 8 children who went on to kindergarten at the same site, one student received special education eligibility during the kindergarten year.

Center for Response to Intervention in Early Childhood (CRTIEC) – is a research center funded in 2008 by the U.S. Department of Education’s Institute of Education Sciences, National Center for Special Education Research. The long-term goal of the Center is reduction in the prevalence of children not ready for kindergarten in language, communication, and literacy skills using a Response to Intervention (RTI) instructional approach to language and early literacy in the preschool years. Specific outcomes of interest include: vocabulary, phonological awareness, print awareness and alphabet knowledge, and comprehension. Developing the tools needed to implement an RTI approach with pre-k children will help to ensure that all children have the support they need for success in learning.

The Center is in its second of five years. The work will be implemented in at least four states (KS, MN, OH, OR) enrolling Head Start, Head Start Childcare, and public Pre-Kindergarten programs. The main goals of the Center are to: (a) improve existing and develop new assessment tools in support of RTI with language and early literacy goals, and (b) develop and evaluate the efficacy of language and early literacy interventions designed for multiple tiers, specifically Tier 2 and Tier 3. The Center also is conducting a study of Tier 1 intervention as a means of better understanding the quality and fidelity of Tier 1 instruction, including the prevalence of preschool children in programs needing Tier 2 and Tier 3 interventions.

Within these specific aims, development research is underway. Studies using single-case designs are building promising techniques/instructional components for Tier 2 and 3 interventions. Assessments are being developed for screening, progress monitoring, instructional planning, and fidelity of implementation purposes. These studies involve multiple phases to identify measures that will be used in subsequent validation studies. Multi-site evaluation studies of the developed interventions and assessment system are planned for the last half of the Center’s five year plan.

Recommendations

To build on the important work that has been funded by the U.S. Department of Education as well as through Head Start and other publicly funded initiatives, we urge the Departments of Education and Health and Human Services to promote early childhood policies that:

- **Promote and enhance national adoption of universal developmental screening** of young children’s early literacy and other cognitive skills (e.g. Pre-k RTI)
- **Support early education policies in ESEA, Head Start, IDEA and other federal laws that intensify professional development** on early behavior and signs of learning difficulty
- **Budget necessary funding** to demonstrate and evaluate the most promising instruction and early intervention approaches for struggling learners
- **Support flexibility to align practices, policies and the braiding of funding** while protecting the federal investment in early childhood education
- **Increase federal research** that divulges how Title I and other early childhood funds directly impact pre-K learning; and, develops valid, reliable methods to improve research-based classroom instruction, interventions and assessments to serve struggling students.

For more information on NCLD, please contact Laura Kaloi, NCLD’s public policy director at lkaloi@nclد.org, 703-476-4894.



The North Carolina
Partnership for Children, Inc.

**Listening and Learning about Early Learning
Workforce and Professional Development**

Submitted By:
Stephanie Fanjul, President
The North Carolina Partnership for Children, Inc.
1100 Wake Forest Road
Raleigh, NC 27604
sfanjul@ncsmartstart.org
919-821-7999
www.smartstart.org
www.facebook.com/smartstart

Twenty years ago, North Carolina had little to be proud of when it came to how it cared for its youngest citizens. An early childhood “teacher” needed only to be 18 years of age, literate, and have as little as a high school diploma or 20 in-service training hours.

But how far North Carolina has come . . . Today, the state is known around the country as a pioneer in creating the nation’s first early childhood *system*. A key component of that system has been investments in our early childhood workforce. As a result, more than 82% of our early childhood teachers now have a college degree or credits toward one.

North Carolina’s success in building an educated early childhood workforce offers three important lessons that can serve as a foundation for a national model.

- 1) **Put the right supports in place.**
- 2) **Align professional development strategies within a statewide** Quality Rating and Improvement Systems (QRIS).
- 3) **Establish a local network.**

Put the right supports in place.

North Carolina provides two significant supports to early childhood teachers: 1) scholarships to help teachers afford additional education, and 2) salary supplements to help teachers earn a living wage. The T.E.A.C.H. Early Childhood® Project and The Child Care WAGE\$® Project are the cornerstones of North Carolina’s early childhood professional development investment.

The T.E.A.C.H. Early Childhood® Project was designed to address the issues of under-education, poor compensation and high turnover within the early childhood workforce. It provides scholarships to child care workers to complete early childhood coursework and to increase their compensation. Scholarships provide support for tuition, books, and a small travel stipend. After completing the educational requirements, participants are eligible to receive increased compensation in the form of a bonus (ranging from \$100 to \$700) or a raise (4% or 5%). According to the North Carolina Department of Health and Human Services, in 2009 alone, 99,588 of children were impacted by T.E.A.C.H.

The Child Care WAGE\$® Project is designed to provide children more stable relationships with better educated teachers by rewarding teacher education and continuity of care. The project provides education-based salary supplements to low-paid teachers, directors and family child care providers working with children between the ages of birth to five. Salary supplements are paid every six months as long as participants remain with the child care program. WAGE\$® has reduced turnover and encouraged teachers, directors and family child care providers to continue their education. In FY 2009-10, more than 8,193 providers in North Carolina received a supplement.

Align professional development strategies within a statewide Quality Rating and Improvement System (QRIS).

In 2000, North Carolina launched one of the nation's first star-rated license systems for child care centers and homes. Today, the star rating is based on two components: program standards and staff education. Therefore, professional development for early childhood teachers is built into the state's Quality Rating and Improvement System (QRIS). Child care programs with teachers who have higher levels of education are awarded more points, thereby increasing their star rating and their subsidized reimbursement rate.

The star rating system has resulted in the child care marketplace creating a demand for quality. Because education of staff is a critical component, child care programs are placing a higher premium on supporting professional development initiatives. Smart Start local partnerships use a variety of strategies to assist them in improving quality, including programs like T.E.A.C.H. and WAGE\$®. With the support of Smart Start, the number of children benefiting from high quality care has dramatically increased. In 2001, only a third of North Carolina children in child care attended 4 and 5 star centers. By 2009, the number was almost two-thirds. The rates are even higher for children from low-income families. In 2009, 73 percent of children whose families received help paying for early childhood care and education attended 4 and 5 star centers (compared to 30% in 2001).

Establish a local network.

In North Carolina, Smart Start has a presence in every county in the state and, therefore, a direct connection to the early childhood workforce. A critical piece of local partnership

work is to help child care programs enhance and maintain quality. They ensure that providers are aware of and have access to professional development opportunities. They coordinate onsite professional development tailored to areas of need and provide ongoing technical assistance to providers.

Local Smart Start partnerships also inform and engage parents and their larger communities regarding the, importance of professional development. **Partnerships act as the conveners in their communities bringing together** all the people involved in a young child's life. As independent nonprofit organizations, each has its own board that includes representatives from county agencies, private business, education, nonprofits, religious organizations, child care providers, parents and other community members. This emphasis on local control means that funding decisions are done at the community table, resulting in local buy-in and support.

This local component has been the lifeblood of WAGE\$®. Local Smart Start partnerships have demonstrated an unwavering commitment to funding the program across the state. In fact, they are the program's primary funder. Likewise, as part of their quality enhancement work, this statewide network of community groups has been the loudest voice of support for T.E.A.C.H, helping to ensure its continued funding by North Carolina's General Assembly.

Conclusion

The lessons described here are not unique to North Carolina. Like the country, our state is incredibly diverse. We have rural and urban populations, mountain and coastal regions, multicultural citizens, and large numbers of high-poverty communities. We are a microcosm of the nation.

What has made North Carolina successful is that regardless of our differences, we have united behind the belief that an educated early childhood workforce is critical for our children *and* our state to thrive. We have created a movement – a statewide network of advocates with the knowledge and conviction that the single biggest predictor of child care quality is the relationship between teacher and child.

To: Office of the Secretary

In my experience working with early childhood teachers and having worked in preschools for 20 years I think that teaching teachers how to teach children to play constructively is what many of them lack training in. We mouth the words “children learn through play” but then we don’t follow through. It seems that teachers with four year degrees in early childhood have more of an understanding about this but since many early childhood teachers, lack degrees and get only certificates or at best two year degrees, these are the people you need to educate about not only the value of play but how to encourage and facilitate play.

Marjo Nordhorn, MSW, MEd.
Child Development Specialist



Service Employees International Union Written Comments, Early Learning Listening and Learning Tour

On behalf of our 2.2 million members, we thank the U.S. Departments of Education and Health and Human Services for the opportunity to share our thoughts about building an integrated, comprehensive and high quality early childhood system.

SEIU members have a strong stake in early education programs. More than 300,000 of our members work in the early care, early learning and K-12 fields, working in schools, child care centers, Head Start programs, and home-based settings across the country. Many of our members are also working parents who depend on strong early childhood and K-12 programs to provide their children with the skills and supports they need to become school-, college- and career-ready.

However, as public investment in early education has remained stagnant in recent years, our members have had to struggle to provide quality services that help children get ready for success in school and beyond. The Departments of Education and Health and Human Services now have an opportunity to develop and align a high quality mixed delivery early childhood system with the public education system so that our children can realize the greatest gains. We greatly appreciate the commitment that the Obama administration has already shown through increased funding for education, child care and Head Start in the American Recovery and Reinvestment Act of 2009 and the funding increases proposed in the FY 2011 budget. We urge the Departments of Education and Health and Human Services to build upon this progress by investing in and integrating critical early childhood programs with the K-12 programs to create a seamless system that aligns services for children from birth to college-age.

SEIU offers the following recommendations on building a birth to college continuum:

Integrating early care and learning within K-12 structures—Research shows that the early years of a child’s life are critical. Nurturing, supportive child care coupled with developmentally-appropriate early education opportunities such as Head Start and preschool, as well as early intervention strategies like Early Head Start and developmental screenings help to close the achievement gap and prepare children for school.

To optimize children’s healthy development and school readiness, particularly in high-risk, high-poverty communities, the Departments of Education and Health and Human Services should promote an integrated early care and education system that encourages alignment between three separate levels of child development: birth to age three, preschool and K-12.

The existing early childhood workforce working across a range of settings (child care homes, centers, schools, and non-profit or for-profit organizations) should be supported to provide a continuum of early care and education services, including high quality pre-school. This way parents have access to both child care and early learning in the setting or settings that meets their family’s needs. Federal investments should be targeted at improving the quality of services provided to infants and toddlers to ensure their optimal development prior to preschool or kindergarten. Incentives that reward community and school partnerships should be incorporated into new and existing federal early

childhood and k-12 programs, so that parents have a range of options which would help prepare children for a smooth transition to kindergarten.

Increasing quality by strengthening workforce and professional development—Research shows that formal education and specialized training in early education are linked to quality care. However, only 55 percent of family child care providers and 57 percent of centers assistants have any education beyond high school. Eighty percent of center teachers (which account for 24 percent of all child care providers) have some education beyond high school.⁶ In Head Start, 35 percent of teachers have a BA, while 53 percent have at least an Associate’s degree or Child Development Credential.⁷

Too many young children, particularly those in high-poverty communities, are starting preschool or kindergarten without the skills they need to succeed. Improving the quality of educational and developmental supports that these young children receive before their preschool years can help close later achievement gaps and ensure a child’s ability to succeed in a K-12 environment.

Consequently, federal early childhood and K-12 programs, including ESEA, should incorporate workforce development supports and career advancement opportunities for early care and education providers. Federal policies should expand **access to affordable, incentive-based training programs**, offered in convenient community-based locations and through diverse providers such as child care resource and referral agencies, community colleges, and union training funds. Trainings should be carefully designed to meet the needs of providers and should recognize the value of experience, helping providers’ bridge the gap from community based-training to college coursework. Degree or certification requirements should be phased in over time and should be coupled with financial supports, including grants, stipends, or scholarships. Workforce initiatives must be designed to include and support caregivers who are Limited English Proficient or license-exempt as these providers often care for our most vulnerable children in our most at-risk urban areas. Coupling such workforce development initiatives with adequate compensation, wage enhancements and benefits, as well as other professional supports such as a substitute pool, would help build and retain a pipeline of experienced, high-quality providers who can ensure that children are ready for success in school and beyond.

Increasing quality by focusing on standards and assessments—While the quality of educational programs and the workforce delivering those services is critical to ensuring positive child outcomes, so is the environment in which the child is developing and learning. Research shows a strong correlation between physical and mental health, and academic functioning. When exposed to environmental health and safety risks, children may suffer disproportionately. Unsanitary conditions, unsafe equipment and a lack of supervision can pose significant threats to a child’s well being, leading to problems with stress, behavior, academic achievement, and productivity. However, if children are in safe, nurturing and healthy environments, they tend to be happier, productive and more successful.

While ESEA has clear goals to increase the standards for teachers, school administrators and students in the public K-12 system, the early childhood industry does not have comparable standards that hold all employers to a minimum threshold for providing quality services and environments. Workforce standards around the fair pay and treatment of teachers and staff, as well as healthy environment, will increase the quality of early childhood programs, ensuring that young children are prepared for school success and beyond. We encourage the Departments of Education and Health and Human Services to

⁶ NACCRRA, Child Care Workforce, available at http://www.naccrra.org/randd/child-care-workforce/cc_workforce.php.

⁷ CLASP (October 23, 2009), Head Start by the Numbers, 2008 PIR Profile, available at <http://www.clasp.org/admin/site/publications/files/headstartdata2008us.pdf>.

set guidelines holding employers accountable to developing and maintaining quality programs and work environments.

Engaging families to better meet children and community needs—The Departments of Education and Health and Human Services have long recognized the importance of communities and families in supporting children’s education because a parent is a child’s first teacher. SEIU believes this is an important goal and we encourage the Departments of Education and Health and Human Services to continue to support families and communities by working in partnership to deliver services and supports that address the full range of children needs from birth to college-age.

In conclusion, thank you for this opportunity to share our ideas on how we can build and align a high quality, mixed delivery early childhood system with the public education system. SEIU’s members who work in school districts, as well as in the early care and education field across the country know firsthand what challenges our children face today. Focusing investment efforts on a child’s early years will help build a solid foundation that will guide a child successfully through school, as well as later in life. SEIU looks forward to working with the U.S. Departments of Education and Health and Human Services to develop a successful educational and support system for all children from birth to college.

For more information, Please contact Jaya Chatterjee, Executive Liaison, SEIU

* jaya.chatterjee@seiu.org * Phone (202) 730-7703 * Fax (202) 350-6603 * Cell: (202) 372-7258



The Division for Early Childhood of the Council for Exceptional Children (DEC)

Listening and Learning about Early Learning

May 18, 2010

The following comments are provided on behalf of the Division for Early Childhood (DEC) of the Council for Exceptional Children. DEC is a professional membership organization whose mission is to promote policies and advance evidence-based practices that support families and enhance the optimal development of young children who have or are at risk for developmental delays and disabilities.

We appreciate this opportunity to provide comments. As you know, DEC and our membership has had a long history of providing leadership, policy, and recommendations to the Congress and the Executive Branch on behalf of young children (birth through 8 years) with disabilities and other special needs and their families. We applaud the Departments of Education and Health and Human Services for including the voice of disability throughout their Listening and Learning about Early Learning tour. DEC had the opportunity to provide comment during two of the listening sessions. This document represents our association's comprehensive comments on each of the four components of the tours: Understanding Preschool- Grade 3 Structures; Family Engagement; Workforce and Professional Development; and Standards and Assessments.

DEC requests consideration of the following comments as policies are developed and funding decisions made related to ensuring that **all** young children and their families have the supports and evidence-based services necessary for each child to be successful in quality early learning settings within their community.

Understanding Preschool – Grade 3 Structures

DEC strongly believes that high quality early childhood programs must be structured to facilitate access, participation, and supports for all children and their families through

- Access – providing a wide range of activities and environments for every child by removing barriers and offering multiple ways to promote learning and development.
- Participation – using a range of instructional approaches to promote engagement and a sense of belonging for every child.
- Supports – ensuring professional development, incentives for inclusion, and opportunities for communication and collaboration among families and professionals. (DEC/NAEYC, 2009).

In order for young children with disabilities and their families to participate in and benefit from early learning opportunities, program structures and policies must:

- create high expectations for every child, regardless of ability;

- implement an integrated, developmentally appropriate, universally designed curriculum framework that is flexible, comprehensive, and linked to assessment and program evaluation activities;
- promote program philosophies on inclusion to ensure shared assumptions and beliefs;
- establish systems of services and supports that reflect the needs of children with varying abilities;
- incorporate program and professional standards that support inclusion;
- strengthen professional development across all sectors of the early childhood field;
- support partnerships among families, service providers, and caregivers, recognizing that each family's unique strengths, concerns, and responsibilities are critical to the design and implementation of effective interventions; and
- revise federal and state accountability systems to reflect both the need to increase the number of children with disabilities enrolled in inclusive programs as well as to improve the quality and outcomes of inclusion (DEC, 2009).

Program structures at the federal, state, and local levels must facilitate coordinated, systematic approaches to the provision of services and supports to young children and their families. A smooth, coordinated learning experience for each young child is important. Many children in this age range are served by multiple programs, making it difficult to provide a continuum of learning and to plan seamless transitions. Separate funding streams, eligibility criteria, and program goals and standards across various types of early childhood programs serve as a barrier to effective communication and service integration and increases duplication of services (DEC, 2006).

Family Engagement

DEC strongly believes that effective early learning programs must respect and support the culture, values, and languages of each family and promote their active participation in order for optimal development and learning of all children to occur. Legislation and recommended practices call for individualized approaches to serving infants, toddlers, and young children with disabilities and their families. Individualized services begin with responsiveness to differences in race, ethnicity, culture, language, religion, education, income, family configuration, geographic location, ability, and other characteristics that contribute to human uniqueness (DEC 2004; DEC 2002).

Family engagement is critical in all aspects of early learning activities including assessment, program planning, curriculum, and evaluation. DEC promotes family centered practices to ensure families receive individualized, meaningful, and relevant services and supports responsive to their beliefs, values, customs, languages, and culture. DEC is committed to enhancing the quality of children's lives by promoting family well-being and the provision of services in the context of typical daily activities. The role of the family as the child's first and most significant teacher is firmly acknowledged within the fields of early childhood, early intervention, and preschool special education.

DEC's research priorities for early intervention and early childhood special education promote the identification and evaluation of the most effective models of family support and collaboration, and the conditions under which these interventions are most effective. Early

childhood is a distinct period in which children's learning and development is dependent on family relationships and environments that are embedded within a wide range of socio-cultural contexts. Specific areas of needed research include:

- Determining where professional-family partnerships lead to enhanced capacity and other outcomes for children and families; and
- Identifying which early education and intervention services, resources, and supports are most relevant and useful for families, and under what conditions. (DEC, 2006).

Workforce and Professional Development

DEC views and values professional development as an ongoing process guided by high standards and competencies for professional performance and practice. Early childhood practitioners should acquire the knowledge, skills, and dispositions to work with all young children (including those with disabilities) and their families within natural and inclusive environments promoting children's overall growth, development and learning and enhancing each family's quality of life. In addition, professionals continually should seek and interpret evidence-based information for planning and implementing individually appropriate learning environments linked to ongoing assessment and collaboration with parents and professional team members. DEC recommendations related to professional development include:

- Engage in ongoing and systematic reflective inquiry and self-assessment for the purpose of continuous improvement of professional performance and services to young children with disabilities and their families;
- Continually be aware of issues challenging the field of early childhood special education and advocate for changes in laws, regulations, and policies leading to improved outcomes and services for young children with disabilities and their families;
- Be responsible for maintaining the appropriate national, state, or other credential or licensure requirements for the services we provide while maintaining our competence in practice and research by ongoing participation in professional development and education activities; and
- Support professionals new to the field by mentoring them in the practice of evidence and ethically based services. (DEC, 2009);

Professional development for our early learning workforce should be based on evidence-based practices and professionally endorsed standards. It should also include collaborative agreements with other professional organizations. Preparation should equip practitioners with the knowledge and skills to meet the continuum of abilities and needs demonstrated by young children who have or are at risk for developmental delays and disabilities, and their families.

For professional development opportunities to be successful DEC recognizes that:

- Personnel standards must be developed within a collaborative framework including representation of key stakeholders and representatives of the professional organizations which represent the

early learning workforce (e.g. DEC, CEC, NAEYC, ATE, ZERO TO THREE, ACEI, ASHA, NASP, AOTA, ITCA, APTA), policymakers, and families.

- Early childhood intervention addresses the needs of children from birth through eight years of age and their families. The first eight years of life comprise three relatively unique developmental and experiential phases: birth–three years, three–five years, and five–eight years. Personnel certification/licensure for these phases should represent the distinctions among them.
- Clear and direct linkages should exist among personnel standards, recommended practices, and evidence-based practices. Multiple pathways should be used to prepare personnel for positions that support the development and education of young children who have or are at risk for developmental delays and disabilities and their families. For example, an early childhood paraprofessional and a speech-language pathologist who are employed in their disciplines might pursue competencies in early intervention for infants and toddlers with disabilities together in an interdisciplinary program.
- Personnel should be prepared in the multiple settings that exist in which the development and education of young children, who have or are at risk for developmental delays and disabilities and their families, are supported. These settings include, but are not limited to home, childcare, school, community, and other settings.

Many states have developed models for certification/licensure. DEC believes that the content of state licensure should:

- Reflect current recommended practices that are empirically based;
- Use standards that embed contemporary philosophical orientations about young children and families;
- Include the key concepts and successful strategies recommended for personnel preparation programs;
- Represent state and federal legislative expectations;
- Be based on a career ladder that builds on previous knowledge and skills to enhance and expand the quality of the workforce in early childhood; and
- Evaluate competence utilizing performance- and outcome-based measures.

Although certification/licensure is an important step in professional development, initial certification/licensure reflects entry-level competence. Other factors, including program of study, experience, knowledge and skills related to collaboration, critical thinking, leadership, professional ethics, attitudes/beliefs, and mastery of motivation, enhance and expand an individual's self-efficacy and perceived competence.

Standards and Assessments

DEC believes that program standards should be revised so that inclusion of young children with disabilities is foundational. Because existing early childhood program standards primarily reflect the needs of the general population of young children, improving the overall quality of an early childhood classroom is necessary--but might not be sufficient--to address the individual needs of each and every child. Inclusion should be used as the foundation for identifying high quality programs. DEC and the National Association for the Education of Young Children (NAEYC) have developed a joint position statement on inclusion that offers a shared definition of inclusion and should be used to guide the development of policies and standards.

Assessment practices should be integrated and individualized in order to: (a) answer the questions posed by the assessment team (including family members); (b) integrate the child's everyday routines, interests, materials, caregivers, and play partners within the assessment process; and (c) develop a system for shared partnerships with professionals and families for the communication and collection of ongoing information valuable for teaching and learning. To this end, DEC has identified three key indicators of effectiveness:

- **Assessment involves family-professional partnership.** The process must be designed to facilitate family inclusion at multiple levels in response to family-identified preference and with sensitivity to family values, needs, language, and culture. It is the responsibility of the professional team members to ensure an honest and collaborative experience for family team members.
- **Assessments should be developmentally and individually appropriate and educationally significant.** Assessments that are developmentally and individually appropriate include the use of authentic and multiple measures and sources to assess child status, progress, and program impact and outcomes. When assessment is used for monitoring progress or measuring outcomes, the assessment must provide sufficient information to accomplish this purpose.
- **Special care should be taken to ensure adherence to professional ethics and practices.** Use of assessment instruments for their intended purposes is particularly critical in the assessment of children with disabilities. It may be necessary to go beyond assessment of general functioning, using assessment tools matched to developmental concerns (e.g., challenging behaviors, pervasive developmental delays, and early language development).

In addition, DEC's research priorities for early intervention and early childhood special education promote further development and evaluation of methods that promote early identification and timely intervention, and those that help practitioners link assessment and intervention practices as part of an integrated system. Within this realm of research, there are several areas of need. Specifically, early childhood teachers and specialists need resources and expertise in administering:

- 1) Universal screening and evaluation for all children, and
- 2) Research based interventions and progress monitoring for individual children who require additional support and focused interventions to access and successfully participate in the general education curriculum and daily activities.

There is a need to further develop and evaluate specific assessment approaches, such as curriculum-based measures and alternative assessments for children with disabilities, as well as specific interventions such as routines-based and embedded instructional practices in inclusive and natural settings. Research is needed with regard to assessments and interventions for young children from diverse cultural and linguistic groups and for those with particular types of disabilities (e.g., autism spectrum disorders, low-incidence populations such as deaf-blind, children who have or are at-risk for learning disabilities, mental health, children who are hurt and vulnerable, or those with serious emotional disorders).

In closing, DEC appreciates the opportunity to comment on the areas included in this listening and learning tour. However, we must also take this opportunity to note that adequate federal investment in these important activities is essential to successful outcomes for young children and their families. The investment in comprehensive, collaborative, and effective services for young children is crucial to future generations of Americans. DEC shares the Administration's dedication to quality services for our youngest citizens and underscores the need to significantly increase federal funding to achieve this important goal.

DEC offers our assistance as policies are developed to support ALL young children and their families. Leaders within our organization can offer expertise across a variety of research and practice areas impacting very young children with diverse abilities and their families.

For further information please contact:

Virginia Buysse, DEC President, 919-966-7171 virginia_buysse@unc.edu
Sarah Mulligan, DEC Executive Director, 406-543-0872 sarah.mulligan@dec-sped.org

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All of the following can be found at www.dec-sped.org

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Early Intervention Family Alliance
www.EIFamilyAlliance.org

May 17, 2009

Hon. Arne Duncan
Secretary
US Department of Education
400 Maryland Avenue, SW., rm 7W219
Washington, DC 20202

Hon. Kathleen Sebellius
Secretary
US Department of Health & Human Services
200 Independence Avenue, S.W.
Washington, DC, 20201

Comments submitted via email to : earlylearning.comments@ed.gov

Dear Secretary's Duncan and Sebellius,

The Early Intervention Family Alliance (EIFA) is a national group of family leaders dedicated to improving outcomes for infants and toddlers with disabilities and their families. The EIFA represents family leaders' involved in Part C programs in states and other jurisdictions implementing the Individuals with Disabilities Education Act (IDEA) Part C for infants and toddlers with disabilities and their families.

The EIFA is ready and willing to participate and assist in the implementation of the Obama Administration's Early Childhood Initiatives. We provide this statement to the Listening and Learning about Early Learning tour of HHS and ED in support of these efforts. First we would thank you for the commitment to early childhood and specifically the role of Part C, of the IDEA, in fostering successful outcomes for infants and toddlers with disabilities.

The Guiding Principles of the Early Intervention Family Alliance:

- The EIFA works to assure meaningful family involvement in the development of Part C policies and its implementation at the community, state and federal levels.
- Families are essential partners in implementing family-centered practices in all levels of early intervention and are respected experts on services for their children and family.
- Families have equal access to training and technical assistance to foster meaningful involvement.
- Family diversity and voices of the underrepresented are essential to insuring quality services and implementation of policies and practices; which are family-centered, community-based and culturally competent to ensure the highest quality programs.

The EIFA has previously communicated with the Administration during the Transition process and again to specifically address the need for additional funding to address the growing number of infants and toddlers and their families requiring early intervention supports and services. In this circumstance, we will focus our remarks on the four areas identified by the Early Learning Listening and Learning Tour.

Understanding Preschool—Grade 3 Structures:

Part C of IDEA was enacted in 1986 to assist states to develop and implement a statewide, comprehensive, coordinated, multidisciplinary, interagency system that provides early intervention services for infants and toddlers with disabilities and their families. Part C is intended to enhance state capacity to provide quality early intervention services and expand and improve existing early intervention services being provided to infants and toddlers with disabilities and their families. This law is intended to enhance the development of infants and toddlers with disabilities and to minimize their potential for delay, reduce educational costs and to minimize the likelihood of institutionalization. All U.S. states and territories are currently participating in this important program. Each state has great latitude in the design of their state Part C structure, including designation of the lead agency for Part C, the way in which other early childhood programs fund and support it's Part C system, and the definition of developmental delay for determining eligibility for Part C services.

One of the primary goals of Part C is to enhance the capacity of families to meet the special needs of their infants or toddlers with disabilities. Another goal is that families actively participate in the decisions about their child's services and understand their child and family's rights under the law. We would also like to draw your attention to the fact that Part C is intended to be an interagency program utilizing multiple funding streams. It is therefore imperative that any discussion about early learning include the needs of infants and toddlers with disabilities and their families. Changes to Medicaid, private insurance, Headstart, Evenstart, Title V, Title XIX, Title XX, HHS foster care, CAPTA programs and the like all have impacts on this program. It is therefore critical that federal agencies align their regulations and include the input of stakeholders when discussing possible impacts on the population served by these systems.

The EIFA has corresponded with OSEP regarding our belief that families should provide informed consent when the system accesses public and/or private insurance and benefits. We want to maximize the dollars available to states and we believe that families must be provided with information about all costs related to participation in these programs. We agree that Part C was intended to be a system; however, we are concerned that many states have not insured that Part C monies did not supplant programs that existed prior to the enactment of Part H. Rather than hold those other state agencies accountable, states have enacted a more complex system of private insurance and parent fees. The EIFA recommends that OSEP work closely with Congress and HHS to incorporate references to Part C and Part C provisions into Title V and Title XIX, in order to clarify how the funding streams should work together.

The EIFA has requested that OSEP clarify in regulations that consent must be provided annually in conjunction with the IFSP and that it is not necessary to obtain consent to bill private and/or public insurance each time a service is provided. Further, the EIFA supported the proposed requirement that states identify and inform families about the state's system of payments and of

all potential costs to parents related to the provision of Part C services. It makes the system of payments more transparent for families. The EIFA recommended that, as a part of the System of Payments, families should be informed about ERISA issues that may impact how Part C interacts with their health insurance. The EIFA also recommended that family procedural safeguards be integrated into each state's System of Payments. Consent is more than merely collecting a signature from a parent, rather it entails sharing with a family their rights and responsibilities and the possible costs to them of using or not using these various benefits to pay for supports and services within the system.

The EIFA supported OSEP's proposed requirement that, as part of obtaining parental consent, that the lead agency identify all potential costs to families. We have heard from families that lead agencies are not always aware of all of the costs parents incur as a result of participating in Part C activities. This is an important step in ensuring that families are informed of potential costs and can make informed decisions on behalf of their child and family. The EIFA also recommends that OSEP make collection of data on these costs a 618 data element. The EIFA further recommends that OSEP support a study to document the effect of the regulations on family decision-making regarding participation in Part C.

The EIFA is concerned that there is no data on the effects to families by the increased use of private insurance and parent fees or on the number of families who request waivers for parent costs due to inability to pay or the number of waivers granted. The EIFA recommended that OSEP require states allow families to use high out-of-pocket costs for other expenses related to their child's disability (e.g., medical and educational costs) and to address issues related to cost-of-living disparities in states (most state's use a cost-of-living differential to determine the rates they pay their providers; it is therefore appropriate that they do the same for families).

There have been numerous reports of families being overbilled and of late billing to their insurer which meant that they were led to believe they were responsible for the unpaid bills and other irregularities for which families have had no formal guidance or recourse. The regulations do not provide guidance to states on the frequency of determining a family's ability or inability to pay. There is no requirement that a family be provided with an Explanation of Benefits (EOB), which would help ensure that the number of units billed matches the number of units of service provided to children and their families. Therefore, we recommend that family rights be incorporated into the System of Payments; that the 618 data system include data about payments sources (including fees), and that families be provided with an explanation of each item that is billed to their insurance.

The EIFA is also concerned that the proposed System of Payments, where parents assume more and more of the cost of participating in Part C, will result in a bifurcated system. Some families may choose not to participate because they would rather make their own choices about what to purchase with their money or are priced out of the system, leaving families who have no other means of obtaining services for their children. It is conceivable that families could choose to only accept the 'free' components, but then purchase services, on their terms, elsewhere. In fact, there are examples of these circumstances occurring at this time. While Part C faces serious funding issues, it is imperative that both OSEP and states seriously consider the potential

consequences to the system of creating a system that asks families to assume responsibility of paying for their services.

We strongly encourage that any discussions of regulation related to the newly passed Healthcare Reform include stakeholders from the Part C program, particularly families, and assess the impacts of proposed reforms on this system. This includes recognizing that children with disabilities are often part of the cohort of children identified in Title V needs assessments even when Title V is not funding or providing supports or services to this population of children. The EIFA is aware that the new law implies that the Maternal, Infant, and Early Childhood Home Visiting program will include children enrolled in Part C programs as part of this cohort. The EIFA would encourage the administration to be more explicit with directions to insure that this new program collaborate with and include Part C programs, and not create a new program separate and distinct from existing programs.

As rigorous developmental and school-readiness targets are being set for all young children, programs that support infants and toddlers with disabilities require additional funding and resources to enable these children their opportunity to meet the rigorous targets set for all children.

Federal allocation –There must be a federal commitment to funding Part C of IDEA commensurate with the value we know it provides; Part C programs are challenged to provide quality services with the current funding. Over the past 15 years, brain research has demonstrated repeatedly the critical need for early intervention for infants and toddlers with disabilities. We are concerned that infants and toddlers with disabilities and their families are losing access to these critical supports and services as funding has decreased.

Permanently Authorize Part C of IDEA - the value of Part C is borne out by both outcomes data and family feedback. It should be permanently authorized in the federal budget.

As states have struggled with decreasing budgets, programs have increasingly turned to the introduction of Family fee (*cost participation*) systems that do not consider critical factors and protections for families and narrowing Part C eligibility requirements, thereby leaving out previously eligible children. The EIFA is concerned that during the strong economy supports and services for infants and toddlers were more readily available in most states, however as the economy has turned many policymakers have begun reducing access to services to infants and toddlers with disabilities, as a community we have forgotten the significant difference we have made for infants and toddlers with delays and established conditions. The pressure to close budgets for this year or next year do not allow us as a society to look at the impact a decade or two in the future if we do not provide these essential supports and services today.

Part C of IDEA refers to the importance of providing services and supports to infants and toddlers with disabilities and their families in a child's natural environment. For many families raising a child with a disability the term natural environment is a simple and common sense term. We are intimately aware that natural environments are more than a place. It is essential that the entire field of early childhood providers understand this term for infants and toddlers with disabilities and assist families in understanding the impact of certain decisions about where,

when and how services are provided to our children. Where, when and how services are provided to an infant or toddler with disability ought to be made based on the needs of the child, not the outcomes desired by the Individual Family Service Plan (IFSP) team.

When we begin to talk about inclusion, one needs to remember that all children means all children, and that includes infants and toddlers with disabilities. While they should be included with all children, they will however require additional funding and additional support in order for inclusion to be successful throughout their educational experiences, starting beginning in Part C and then through the Part B system. Families continue to report difficulties accessing appropriate childcare services for their children with disabilities. We must insure that children with disabilities have access to a continuum of supports and services that also afford their parents the same level of access to childcare services as the parents of typically developing children.

Workforce and Professional Development

The EIFA recommended to OSEP that the Part C regulation include respite providers, parent-to-parent support personnel, paraprofessionals and family support personnel as qualified personnel. The EIFA also suggested that OSEP include parents of a child with a disability as a qualification in the regulations as a way to ensure that the aforementioned personnel be provided with appropriate training and supervision as early intervention providers. We believe that positive efforts must be made to employ and advance in employment qualified individuals disabilities and qualified parents of individuals with disabilities in programs assisted under Part C of IDEA.

It is important that all members of the IFSP team under Part C of IDEA, which includes a child's parents, have equal access to training to support them in their role to identify functional outcomes and develop an IFSP, which enhances the development of an infant or toddler with a disability.

Within the realm of workforce and professional development we must insure that we have a workforce that has expertise in providing certain specialized supports and services to infants and toddlers with disabilities. We must also insure that everyone within the workforce is comfortable welcoming a child with a disability into their program. The continuum of supports and services for infants and toddlers must insure that there are programs that address the needs of all infants and toddlers with disabilities and that infants and toddlers with disabilities have the ability to participate in programs and activities alongside their typically developing peers.

Family Engagement

Part C has a long-standing history of being a family-driven, family-centered program. Families often cite the importance of family support in their child and family's success with the early intervention program. Part C Service Coordination is an important component of the Early Intervention program for infants and toddlers with disabilities and their families. When families enter the Early Intervention program, they are introduced to a new set of systems, it is important that they obtain all early intervention services and have assistance in gaining access to non-early intervention services that they may also need. The law and regulations have always recognized the need for a single contact point to coordinate services across agency lines and to ensure that

families have access to and obtain those services identified in the IFSP in a timely manner. The EIFA believes that families enrolled in early intervention need one service coordinator with the role of assisting parents to obtain services and supports they need and to facilitate the timely delivery of services in a culturally sensitive manner and in their preferred language. Gaining access may be interpreted, for example, to mean that a family is on a waiting list or is given a list of providers to hunt out on their own. The EIFA continues to urge the administration to require that all efforts are made to insure that services are obtained and delivered in a coordinated effort.

The EIFA recognizes the importance of a family-directed assessment under IDEA. This voluntary assessment which assists families in identifying and addressing their resources, priorities and concerns can result in improved and functional outcomes for infants and toddlers with disabilities and their families. The EIFA encourages the use of the term "family-directed assessment" consistently. The family-directed assessment should be something done with a family and not to a family. We also encourage the Department to include the reference to include members of the extended family, as invited by the parent(s) in the regulation in accordance with the family's preferences and cultural norms.

As previously stated the EIFA recognizes the importance of family involvement. It is important however to realize that in a voluntary program like Part C of IDEA, families are engaged from the minute they open the door. However, our engagement is often reported as waning or lacking by professionals. Interviews and discussions with families reveal however that their interest and engagement in their child's development doesn't wane, rather that their experiences with professionals can at times create a disconnect with the professionals working with their families. It is important therefore that professional development assist professionals in developing the skills and knowledge necessary to continue to engage and involve families and to express an attitude that values the outcomes that a family has identified for their child within their family.

It is important that all members of the IFSP team under Part C of IDEA, which includes a child's parents, have equal access to training to support them in their role to identify functional outcomes and develop the IFSP in order to best enhance the development of an infant or toddler with a disability.

Many parents choose to utilize the knowledge and skills they gain as a result of being involved in (as noted above)early intervention to participate on their State's Early Intervention Coordinating Council (ICC) a required component of Part C of IDEA. The EIFA espouses that states intentionally implement supports to these individuals in order to maximize the benefits these involved parents bring to each state's Part C of IDEA and early childhood system.

Standards and Assessments

While the EIFA supports efforts to improve accountability we are greatly concerned that:

- Data collection, rather than child and family needs, drives service delivery options and implementation. Data collection must result in information that has the capacity to not only meet state requirements, but also lead to systems improvement efforts.
- The use of technology (e.g., electronic service plans) to increase accountability should not result in "cookie cutter" supports and services, or compromise the role of the family as a member of

their child's IFSP team, or be used in a way that blocks the family's access to information and their family rights with respect thereto.

-There is a need for research and development utilizing federal funds, of new developmental assessment tools for use with Part C of IDEA and other early childhood programs, The release of the National Academy of Sciences report Early Childhood Assessments: Why, What, How indicates there is a need to improve the quality and validity of our early childhood developmental assessment tools, so that they are valid for use with children with disabilities and other diverse populations, for example ethnic minorities; reflect universal design principles; and measure outcomes that are meaningful in the daily lives of young children with disabilities and their families. Once developed, there must be ongoing support and education on the utilization of these tools by evaluators, practitioners, policymakers and families.

The EIFA recognizes the importance of a family-directed assessment under IDEA. This voluntary assessment which assists families in identifying and addressing their resources, priorities and concerns can result in improved and functional outcomes for infants and toddlers with disabilities and their families. Again, the EIFA encourages the use of the term "family-directed assessment" consistently. The family-directed assessment should involve a process done with the family and not to the family. We also encourage the Department to include the reference to include members of the extended family, as invited by the parent(s) in the regulation (as noted above).

The EIFA is ready and willing to participate and assist in the implementation of the Obama Administration's Early Childhood Initiatives. We provide this statement to the Listening and Learning about Early Learning tour of HHS and ED in support of these efforts. First we would thank you for the commitment to early childhood and specifically the role of Part C, of the IDEA , in fostering successful outcomes for infants and toddlers with disabilities.

Sincerely,

Darla Gundler

President
Early Intervention Family Alliance
eifamilyalliance@aol.com
www.eifamilyalliance.org

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Strategies
for
Children
A campaign of

May 18, 2010

Office of the Secretary
Attention: Listening and Learning about Early Learning – Public Input Meetings
U.S. Department of Education
400 Maryland Avenue, SW., room 7W219
Washington, DC 20202

To Whom It May Concern:

On behalf of Strategies for Children, Inc., (SFC) I am writing to provide feedback on the topic of **Understanding Preschool – Grade 3 Structures**, the first of four topics that the Department of Education addressed in its recent listening and learning tour. US Secretary of Education Arne Duncan has stated, “If we are to close the achievement gap and develop a cradle-to-career educational pipeline, early learning programs are going to have to be better integrated with the K-12 system.” SFC strongly agrees with this statement and urges the Department of Education, in concert with the Department of Health and Human Services, to establish funding streams and policies that encourage and support states in developing early learning systems from birth through age 9.

Strategies for Children’s signature campaign, Early Education for All, is a coalition of leaders from business, education, early childhood, labor, religion, health care, and philanthropy committed to building a universally accessible system of high-quality early education in Massachusetts. Our work, in partnership with others, has helped build an initial infrastructure to support programs serving young children, including:

- The creation of the first-in-the-nation consolidated **Department of Early Education and Care**, one of three education agencies which form the Massachusetts Executive Office of Education;
- The creation of the **Universal Pre-Kindergarten program**, providing grants to high-quality programs serving 6,400 children;
- Unanimous passage of “An Act Relative to Early Education and Care” formally establishing UPK in state statute, subject to appropriation;
- Initial funding for the design and piloting of a **quality rating and improvement system (QRIS)**; and
- An increase in the percent of Massachusetts’ kindergarteners enrolled in full-day programs to 77%, up from 38% in 2000.

However, while much has been accomplished, much remains to be done, making funding and guidance from the federal government all the more critical to help ensure that our children have access to high-quality early education programs that are aligned with our K-12 system. Of particular urgency is the need to address early literacy here and across the nation. **Today in Massachusetts, 43% of third graders – and nearly two-thirds of our low-income students – do not read at grade level.** Research shows that 74% of children who read poorly in third grade

400 Atlantic Avenue, Boston, MA 02110
e-mail: info@earlyeducationforall.org

phone: 617-330-7380
website: earlyeducationforall.org
fax: 617-330-7381

will continue to struggle in school. They are less likely to graduate from high-school, become effective citizens and develop skills essential for contributing to the 21st century global economy.

To ensure that all children are proficient readers by the end of third grade and able to achieve greater life success, states must build education systems that begin at birth and align children's early learning with their K-12 education. In January, Governor Deval Patrick signed into law "An Act Relative to the Achievement Gap," which promoted several PK-3 strategies for raising student achievement and turning around under-performing schools, including:

- Encouraging underperforming schools to provide high-quality pre-kindergarten and full-day kindergarten;
- Encouraging underperforming schools to implement a research-based early literacy curriculum to aid struggling readers; and
- Requiring underperforming schools to conduct developmentally-appropriate PK-3 assessments to monitor children's progress.

While these statutory guidelines provide important signposts for supporting and aligning children's early learning experiences, they do not constitute a comprehensive approach to children's learning and development from birth through age 9. Enclosed is a one-page document that outlines key policies necessary for promoting reading success by the end of third grade. As this document illustrates, achieving reading proficiency by the end of third grade is the culmination of many factors: language-rich home environments, high-quality infant and toddler programs, high-quality pre-kindergarten and full-day kindergarten, PK-3 systems alignment and support, and ongoing professional development across program settings. We urge you and other federal leaders to expand definitions of children's early learning beyond PK-3 and revive the **Early Learning Challenge Fund** to provide states with clear financial incentives and supports necessary for developing early education and care systems. This critical funding stream could potentially be included in the Elementary and Secondary Education Act (ESEA), upon reauthorization. **We look forward to a revised Department of Education ESEA blueprint that reflects the critical importance of the early childhood years.**

Another opportunity to ensure that states invest in birth through age 9 early learning systems is the federal Race to the Top (RttT) Competition. Enclosed is a document we created for the Massachusetts Department of Elementary and Secondary Education outlining necessary investments in children's early learning for each priority category – standards and assessments, data systems, great teachers and leaders, and turnaround schools. While included as an invitational priority for phase one of the competition, **early childhood education should be a required element of any future RttT policy.**

Finally, it is important to note that while we know children's early learning experiences are critical to future school and life success, implementing effective policy reforms is difficult and most programs serving young children have not been evaluated. To better understand successful approaches to improving third grade reading proficiency, SFC commissioned Dr. Nonie Lesaux from the Harvard Graduate School of Education to examine factors that have led to limited gains in the third grade reading proficiency in Massachusetts and outline a plan for improving children's early language and reading. More specifically, key issues, or barriers, will be identified across five domains – systems alignment, data collection and assessment, teacher quality and professional development, high standards and rigorous curricula, and family engagement – followed by "actionable steps" for building an effective early learning system from birth through age 9.

To inform the writing of this report and build supports for the implementation of the recommendations, we convened an advisory committee comprised of key leaders from the early childhood field, K-12, philanthropy, business, legislative leadership, and state agencies. Commissioners of the state Departments of Early Education and Care and Elementary and Secondary Education, as well as both co-chairs of the Massachusetts Legislature's Joint Committee on Education are represented on the advisory committee. SFC plans to host and attend various forums to communicate the findings of the report and galvanize support to improve reading proficiency in Massachusetts. This process will begin with the release of the report at events on June 10 in Boston and June 15 in Springfield. For more information, visit: <http://www.strategiesforchildren.org/0reading.html>



400 Atlantic Avenue, Boston, MA 02110
e-mail: info@earlyeducationforall.org

phone: 617-330-7380
website: earlyeducationforall.org
fax: 617-330-7381

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Through its commitment to high-quality early learning systems, PK-3 supports, and reading proficiency for all children, Massachusetts is poised to move forward. Leadership and sustained support at the federal level would be invaluable in achieving our goals.

Thank you for the opportunity to share our recommendations with your office. If we can be of assistance, please contact me at 617-330-7385 or Chad d'Entremont, our research and policy director, at 617-330-7387 or cdentremont@strategiesforchildren.org.

Sincerely,



Margaret Blood, President
Strategies for Children, Inc.

Enc: *The Building Blocks of Universal Reading Proficiency, Birth to Age 9*
Race to the Top: Prioritizing Third Grade Reading Proficiency



May 18, 2010

Dr. Jacqueline Jones
Senior Advisor on Early Learning
U.S. Department of Education

Dr. Joan Lombardi
Deputy Assistant Secretary
U.S. Department of Health and Human Services

Dear Dr. Jones and Dr. Lombardi,

On behalf of the 40,000 members of the Council for Exceptional Children (CEC), I am pleased to provide you with feedback on the joint U.S. Department of Education and Health and Human Services Early Learning Listening and Learning Tour. As you know, CEC members are committed to improving the lives of children and youth with disabilities from infancy to adulthood. CEC commends the Administration for its efforts in initiating this Tour and seeking stakeholder feedback.

CEC believes a greater investment must be made in policies and evidence-based practices that support families and children, especially those who have or are at risk for developmental delays. As the Administration continues its work to improve early learning experiences for young children, CEC strongly urges for a corresponding Federal investment, not only to support any new initiatives but to bolster existing programs such as the Individuals with Disabilities Education Act Infants and Toddlers With Disabilities program (Part C) and Preschool Program (Part B Section 619). The investment in comprehensive, collaborative, and effective services for young children is crucial to support future generations of Americans.

CEC's comments echo those made by CEC's Division on Early Childhood (DEC). As leaders in the field of early childhood development, DEC members actively participated in the Tour by providing oral and written testimony.

CEC and its members appreciate the Administration's collaborative work to promote early learning for all young children. If our comments raise any questions or concerns, please feel free to contact Deborah Ziegler at debz@cec.sped.org or 703-264-9406 or Kim Hymes, Director, Policy and Advocacy at kimh@cec.sped.org or 703-264-9441.

Very Truly Yours,

A handwritten signature in cursive script that reads "Deborah A. Ziegler".

Deborah A. Ziegler, Ed.D.
Associate Executive Director, Policy and Advocacy Services
Council for Exceptional Children

Understanding Preschool – Grade 3 Structures

CEC strongly believes that high quality early childhood programs must be structured to facilitate access, participation, and supports for all children and their families through

- Access – providing a wide range of activities and environments for every child by removing barriers and offering multiple ways to promote learning and development.
- Participation – using a range of instructional approaches to promote engagement and a sense of belonging for every child.
- Supports – ensuring professional development, incentives for inclusion, and opportunities for communication and collaboration among families and professionals. (DEC/NAEYC, 2009).

In order for young children with disabilities and their families to participate in and benefit from early learning opportunities, program structures and policies must:

- create high expectations for every child, regardless of ability;
- implement an integrated, developmentally appropriate, universally designed curriculum framework that is flexible, comprehensive, and linked to assessment and program evaluation activities;
- promote program philosophies on inclusion to ensure shared assumptions and beliefs;
- establish systems of services and supports that reflect the needs of children with varying abilities;
- incorporate program and professional standards that support inclusion;
- strengthen professional development across all sectors of the early childhood field;
- support partnerships among families, service providers, and caregivers, recognizing that each family's unique strengths, concerns, and responsibilities are critical to the design and implementation of effective interventions; and
- revise federal and state accountability systems to reflect both the need to increase the number of children with disabilities enrolled in inclusive programs as well as to improve the quality and outcomes of inclusion (DEC, 2009).

Program structures at the federal, state, and local levels must facilitate coordinated, systematic approaches to the provision of services and supports to young children and their families. A smooth, coordinated learning experience for each young child is important. Many children in this age range are served by multiple programs, making it difficult to provide a continuum of learning and to plan seamless transitions. Separate funding streams, eligibility criteria, and program goals and standards across various types of early childhood programs serve as a barrier to effective communication and service integration and increases duplication of services (DEC, 2006).

Family Engagement

CEC strongly believes that effective early learning programs must respect and support the culture, values, and languages of each family and promote their active participation in order for optimal development and learning of all children to occur. Legislation and recommended practices call for individualized approaches to serving infants, toddlers, and young children with disabilities and their families. Individualized services begin with responsiveness to differences in race, ethnicity, culture,

language, religion, education, income, family configuration, geographic location, ability, and other characteristics that contribute to human uniqueness (DEC 2004; DEC 2002).

Family engagement is critical in all aspects of early learning activities including assessment, program planning, curriculum, and evaluation. CEC promotes family centered practices to ensure families receive individualized, meaningful, and relevant services and supports responsive to their beliefs, values, customs, languages, and culture. CEC is committed to enhancing the quality of children's lives by promoting family well-being and the provision of services in the context of typical daily activities. The role of the family as the child's first and most significant teacher is firmly acknowledged within the fields of early childhood, early intervention, and preschool special education.

DEC's research priorities for early intervention and early childhood special education promote the identification and evaluation of the most effective models of family support and collaboration, and the conditions under which these interventions are most effective. Early childhood is a distinct period in which children's learning and development is dependent on family relationships and environments that are embedded within a wide range of socio-cultural contexts. Specific areas of needed research include:

- Determining where professional-family partnerships lead to enhanced capacity and other outcomes for children and families; and
- Identifying which early education and intervention services, resources, and supports are most relevant and useful for families, and under what conditions. (DEC, 2006).

Workforce and Professional Development

CEC views and values professional development as an ongoing process guided by high standards and competencies for professional performance and practice. Early childhood practitioners should acquire the knowledge, skills, and dispositions to work with all young children (including those with disabilities) and their families within natural and inclusive environments promoting children's overall growth, development and learning and enhancing each family's quality of life. In addition, professionals continually should seek and interpret evidence-based information for planning and implementing individually appropriate learning environments linked to ongoing assessment and collaboration with parents and professional team members. CEC recommendations related to professional development include:

- Engage in ongoing and systematic reflective inquiry and self-assessment for the purpose of continuous improvement of professional performance and services to young children with disabilities and their families;
- Continually be aware of issues challenging the field of early childhood special education and advocate for changes in laws, regulations, and policies leading to improved outcomes and services for young children with disabilities and their families;
- Be responsible for maintaining the appropriate national, state, or other credential or licensure requirements for the services we provide while maintaining our competence in practice and research by ongoing participation in professional development and education activities; and
- Support professionals new to the field by mentoring them in the practice of evidence and ethically based services. (DEC, 2009),

Professional development for our early learning workforce should be based on evidence-based practices and professionally endorsed standards. It should also include collaborative agreements with other

professional organizations. Preparation should equip practitioners with the knowledge and skills to meet the continuum of abilities and needs demonstrated by young children who have or are at risk for developmental delays and disabilities, and their families.

For professional development opportunities to be successful CEC recognizes that:

- Personnel standards must be developed within a collaborative framework including representation of key stakeholders and representatives of the professional organizations which represent the early learning workforce (e.g. DEC, CEC, NAEYC, ATE, ZERO TO THREE, ACEI, ASHA, NASP, AOTA, ITCA, APTA), policymakers, and families.
- Early childhood intervention addresses the needs of children from birth through eight years of age and their families. The first eight years of life comprise three relatively unique developmental and experiential phases: birth–three years, three–five years, and five–eight years. Personnel certification/licensure for these phases should represent the distinctions among them.
- Clear and direct linkages should exist among personnel standards, recommended practices, and evidence-based practices. Multiple pathways should be used to prepare personnel for positions that support the development and education of young children who have or are at risk for developmental delays and disabilities and their families. For example, an early childhood paraprofessional and a speech-language pathologist who are employed in their disciplines might pursue competencies in early intervention for infants and toddlers with disabilities together in an interdisciplinary program.
- Personnel should be prepared in the multiple settings that exist in which the development and education of young children, who have or are at risk for developmental delays and disabilities and their families, are supported. These settings include, but are not limited to home, childcare, school, community, and other settings.

Many states have developed models for certification/licensure. CEC believes that the content of state licensure should:

- Reflect current recommended practices that are empirically based;
- Use standards that embed contemporary philosophical orientations about young children and families;
- Include the key concepts and successful strategies recommended for personnel preparation programs;
- Represent state and federal legislative expectations;
- Be based on a career ladder that builds on previous knowledge and skills to enhance and expand the quality of the workforce in early childhood; and
- Evaluate competence utilizing performance- and outcome-based measures.

Although certification/licensure is an important step in professional development, initial certification/licensure reflects entry-level competence. Other factors, including program of study, experience, knowledge and skills related to collaboration, critical thinking, leadership, professional ethics, attitudes/beliefs, and mastery of motivation, enhance and expand an individual's self-efficacy and perceived competence.

Standards and Assessments

CEC believes that program standards should be revised so that inclusion of young children with disabilities is foundational. Because existing early childhood program standards primarily reflect the needs of the general population of young children, improving the overall quality of an early childhood classroom is necessary--but might not be sufficient--to address the individual needs of each and every child. Inclusion should be used as the foundation for identifying high quality programs. DEC and the National Association for the Education of Young Children (NAEYC) have developed a joint position statement on inclusion that offers a shared definition of inclusion and should be used to guide the development of policies and standards.

Assessment practices should be integrated and individualized in order to: (a) answer the questions posed by the assessment team (including family members); (b) integrate the child's everyday routines, interests, materials, caregivers, and play partners within the assessment process; and (c) develop a system for shared partnerships with professionals and families for the communication and collection of ongoing information valuable for teaching and learning. To this end, CEC-DEC has identified three key indicators of effectiveness:

- **Assessment involves family-professional partnership.** The process must be designed to facilitate family inclusion at multiple levels in response to family-identified preference and with sensitivity to family values, needs, language, and culture. It is the responsibility of the professional team members to ensure an honest and collaborative experience for family team members.
- **Assessments should be developmentally and individually appropriate and educationally significant.** Assessments that are developmentally and individually appropriate include the use of authentic and multiple measures and sources to assess child status, progress, and program impact and outcomes. When assessment is used for monitoring progress or measuring outcomes, the assessment must provide sufficient information to accomplish this purpose.
- **Special care should be taken to ensure adherence to professional ethics and practices.** Use of assessment instruments for their intended purposes is particularly critical in the assessment of children with disabilities. It may be necessary to go beyond assessment of general functioning, using assessment tools matched to developmental concerns (e.g., challenging behaviors, pervasive developmental delays, and early language development).

In addition, DEC's research priorities for early intervention and early childhood special education promote further development and evaluation of methods that promote early identification and timely intervention, and those that help practitioners link assessment and intervention practices as part of an integrated system. Within this realm of research, there are several areas of need. Specifically, early childhood teachers and specialists need resources and expertise in administering:

- 3) Universal screening and evaluation for all children, and
- 4) Research based interventions and progress monitoring for individual children who require additional support and focused interventions to access and successfully participate in the general education curriculum and daily activities.

There is a need to further develop and evaluate specific assessment approaches, such as curriculum-based measures and alternative assessments for children with disabilities, as well as specific interventions such as routines-based and embedded instructional practices in inclusive and natural

settings. Research is needed with regard to assessments and interventions for young children from diverse cultural and linguistic groups and for those with particular types of disabilities (e.g., autism spectrum disorders, low-incidence populations such as deaf-blind, children who have or are at-risk for learning disabilities, mental health, children who are hurt and vulnerable, or those with serious emotional disorders).

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All of the following can be found at www.dec-sped.org

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