



FIRST FOCUS

MAKING CHILDREN & FAMILIES THE PRIORITY

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## RE: Race to the Top Preschool Development Grants

On behalf of First Focus, a bipartisan advocacy organization dedicated to making children and families the priority in federal policy and budget decisions, thank you for the opportunity to comment on this new competitive grant. We applaud the Departments of Education and Health and Human Services (the Departments) for supporting state capacity to develop, enhance, or expand high-quality preschool programs, including comprehensive services and family engagement for preschool-aged children from families at or below 200 percent of the federal poverty line (FPL).

A large body of research reveals the importance of access to high quality early education, yet high quality pre-K is still not available to every child. This is primarily an equity issue: the high cost of private preschool combined with the limited availability of public initiatives means low- and middle-income families can't afford private pre-K and can't access public pre-K, so their children are often left out. This creates unequal starting points for children from high-income families and children from low- and middle-income families when they enter kindergarten. It strains the K-12 system by forcing teachers in the early grades to try to make up for the lost opportunity of pre-K for those children who were left without access, and often those gaps never close. A number of states have worked to remedy this by expanding their state-funded pre-K programs, but the 2009 recession slowed that progress. While investments in these programs are now increasing again, the development grants will help jumpstart this growth. As such, these grants should support efforts to increase access to preschool and to link access to quality to ensure maximum positive impact, and states should have plans to continue funding these initiatives after the exhaustion of the one-time grant funds. Additionally, we make the following recommendations for the pre-K development grants:

- **Ensure that every state is eligible to submit an application and reward states with the most ambitious plans to ensure that more low-income children participate in high-quality pre-K.** The FY2014 Appropriations Act and the Appropriations Committee Report both state that the Departments should make grants designed specifically to build state capacity to offer high quality preschool for four year-olds from low- income families, and we encourage the Departments to follow this requirement. The Committee Report sets two types of grants to states, “low capacity” for states with no state-funded pre-K program or with a small state-funded program and “high capacity” for states with larger state-funded programs. We recommend structuring the competition so that states with limited access to high-quality programs be eligible for “high capacity” grants to increase access, while states with high enrollment rates but lower quality be eligible for “high capacity” grants to increase overall program quality. States eligible for “low capacity” grants should be states with plans to improve both quality and enrollment, including states with no state-funded pre-K programs. Indeed, a close look at the NIEER state yearbook data reveals that, with a few notable exceptions (e.g. DC, WV, OK, GA), there is an inverse relationship between meeting the NIEER quality benchmarks and achieving near universal access. Put another way, most states that

meet the majority of the NIEER benchmarks have little access, and states with more access meet fewer benchmarks. Finally, states with no pre-K program should compete separately from the low capacity grants in order to ensure that states with no existing program but ambitious plans to implement pre-K in their states are among the winners.

- **Prioritize states with high proportion of children with high needs that lack access to high-quality pre-K.** The Departments should award priority points to States that have a high percentage of low-income children or other children with high needs. In the Race to the Top: Early Learning Challenges (RTT: ELC) application, among the three rounds of winners, only one of the fifteen states with the highest child poverty rate was represented among the winners (including Puerto Rico and DC). To better combat inequality of access to pre-K, these grants should better target states with the highest rates of child poverty. The Departments should use the following indicators to determine which states are eligible for priority points: child poverty rates, percentage of dual language learners, homeless children, children with disabilities, children living in rural or geographically isolated areas, migrant children, and the percentage of children eligible but not enrolled in Head Start. Furthermore, all applications should include state plans to address these children's unique and specific needs. Finally, States that have been awarded RTT-ELC grants should not receive priority points in this competition.
- **State applications for development grants should include plans on how they will expand or create high-quality pre-K.** Definitions and guidelines for high quality programs should include a focus on:
  - early learning standards, including enhancing standards for dual language learners, requiring states to align their standards with Head Start Child Development and Early Learning Framework, and requiring states to have in place or in development early childhood education standards that are aligned with K-12 and are developmentally, culturally, and linguistically appropriate and which address all domains of school readiness (language, cognition, physical, social-emotional, and approaches to learning);
  - program standards that are aligned with QRIS and/or Head Start Performance Standards;
  - appropriate time and continuity of education, including providing options for full day and full year programs, aligning childcare and other resources for optional care before and after pre-K so working families and parents who work non-traditional hours can participate, allowing for a full year of enrollment without recalculating income eligibility, and developing plans to support children and families with the transition to kindergarten;
  - a highly qualified, well-compensated workforce made up of educators with a BA in early childhood education or a BA in a related field with demonstrated competency in early childhood education, and these educators should receive compensation and benefits comparable to teachers in grades K-12;
  - family engagement, as stated in the Appropriations Act and Committee Report, that is linguistically and culturally relevant to families because research shows that children's learning and academic achievement increase when families are engaged in children's learning;
  - comprehensive services, as stated in both the Appropriations Act and the Committee Report, including offering health, mental health, dental, and vision screenings with referrals as needed, and priority given to states with a plan for engaging the public health and primary care practices in screening and supports; and

- **Require appropriate assessments for young children.** The Appropriations Committee Reports states that assessments in pre-K programs funded by development grants must conform to the recommendations made by the National Research Council report on early childhood assessments. It is important that assessments for young children adhere to these guidelines. We urge the Departments to ensure that states and local providers follow these recommendations by requiring States to describe in their applications their current approach to child assessment, and explicitly prohibit assessments for children enrolled in pre-K to be used for rewards or sanctions of individual teachers, children, or programs and to prohibit them from basing program effectiveness measures primarily or solely on a single assessment.
- **Increase the share of teachers from diverse cultural and linguistic backgrounds and prepared to work with diverse children.** The Committee report also includes language that allows a portion of development grants to be used for teacher training and education, and inclusion of this in state plans should be a priority for awarding grants. Specifically, to increase the number of minority and dual language participants in pre-K, grant applications should address the need to create a workforce that is representative of children served in these programs. States should be required to provide plans for maintain or increase the diversity of the pre-K teacher workforce, such as offering courses in the primary language. Additionally, States plans around in-service professional development and pre-service degree programs should describe how the State will increase abilities to effectively support learning needs of diverse learners such as dual language learners and other children with special needs.
- **Reward States that leverage other local, state, and federal funding.** State plans for subgrants to LEAs and community-based providers should provide a plan for how they will work together to leverage and coordinate existing resources and programs to ensure that services are not duplicated and to maximize the number of children served. Further, state plans should include language that clarifies these funds must supplement, not supplant current state funding (such as language found in RTT: ELC) and a maintenance of effort provision for states to maintain their investment in early childhood programs (including child care, state-funded pre-K, and home visiting) at the 2011, 2012, or 2013 level, whichever is higher.

First Focus welcomes this exciting new competitive grant opportunity to increase states' capacity for providing high-quality pre-K to children from low- and middle-income families. We hope the Departments will consider our recommendations above and look forward to working with both Departments in awarding and overseeing these grants.

Sincerely,



Bruce Lesley  
President