

January 26, 2012

The Honorable Arne Duncan  
Secretary of Education  
U.S. Department of Education  
200 Maryland Avenue SW  
Washington, DC

NAEYC appreciates the opportunity to provide comments on the U.S Department of Education's draft Strategic Plan for Fiscal Years 2011 – 2014. We are pleased that the Strategic Plan recognizes the importance of providing high-quality learning experiences for young children and a birth through third grade continuum of early learning, as well as the emphasis on connecting research to practice.

The U.S. Department of Education has many opportunities to use existing programs to create a continuum of effective learning and supportive services for children from birth through the early grades. These efforts should be undergirded by a focus on policy and implementation of effective, developmentally appropriate practices based on research and evidence of child development and learning. In addition to the areas noted in the draft plan, we strongly urge the Department to encourage state and local agencies, schools, and classrooms to (1) use Title I for children younger than kindergarten, including comprehensive services and screenings; (2) provide joint professional development between school and community-based early childhood programs and teachers in kindergarten and first grade on developmentally appropriate curricula, formative assessment, and teaching practices; (3) provide professional development for school principals and district administrators not only on child development, but also collaboration with community-based early childhood programs; and (4) encourage states to create distinct birth through age 8 teacher certificates based on the NAEYC teacher preparation standards.

We also urge the Department to continue to collaborate closely with the U.S. Department of Health and Human Services to create high-quality early childhood experiences, including attention to children's health and family well-being as critical elements of their positive development and learning.

NAEYC has the specific following comments on the draft:

**I. Goal 1: Postsecondary Education, Career-Technical Education, and Adult Education**

The overview of this section mentions a need to focus on improving college completion rates. NAEYC is concerned that the push to complete 2-year degrees in three years and 4-year degrees in six years will be unattainable for part-time students - the majority of early childhood staff seeking postsecondary degrees while working in early childhood settings - as this is essentially the time needed by full-time students. In addition, repeat courses or remedial courses will affect degree completion time. Both of these factors can create barriers for many of the adults in the current child care workforce.

**Sub-Goal 1.3: Completion**

NAEYC's teacher preparation standards include clinical experiences. However, it is important that job-embedded or clinical practice includes clinical experience in the range of early childhood settings, including Head Start and child care sites as that is where most children receive their early childhood education.

**II. Goal 3: Early Learning**

The continuum of early childhood learning begins at birth, not at prekindergarten. It is important that the Department's support of a continuum of successful learning recognize the importance of high-quality early childhood development and learning beginning at birth, and delivered in a range of settings (family child care, child care centers, Early Head Start, Head Start, and schools). NAEYC suggests citing additional sources that support the need for high-quality early learning experiences for all of the ages and settings included in the birth through third grade continuum.

**Sub-Goal 3.2: Workforce.**

NAEYC recommends developing a clear and intentional plan to help early childhood teachers access higher education opportunities since there are current opportunities to improve this access. The Higher Ed Opportunity Act of 2008 now allows early childhood educators who are pursuing a Baccalaureate loan forgiveness under the Stafford, Direct, and Perkins loan programs. NAEYC urges the Department to include in the Administration's budget request for fiscal year 2013 and onward sufficient and adequate funds for this loan forgiveness program as well as adequate funding for providing grants to states for integrated, comprehensive early childhood professional development systems under the program for that specific purpose in Title VII of the Higher Ed Opportunity Act of 2008.

NAEYC also recognizes the need for specialized early childhood professional preparation for teachers of children birth through age 8 and underscores the importance of clearly stating the need for such specialization in the Strategic Plan. NAEYC higher education accreditation and recognition is an important indicator that preparation programs are using to align learning opportunities and assessments with specialized early childhood

standards, collecting data on student performance from key assessments, and using that data to improve candidate performance on each standard.

NAEYC supports the use of innovative approaches to attract new students to early childhood teacher preparation programs and to increase completion rates for the current child care and Head Start workforce - within the framework of NAEYC's professional preparation standards. NAEYC also supports stronger partnerships between institutions of higher education and early learning programs (including family child care, school-based child care and Head Start) to implement job-embedded, clinical practice programs for early childhood teacher preparation.

### **Sub-Goal 3.3: Assessment and Accountability**

The NAEYC position statement on early childhood curriculum, assessment, and program evaluation underscores the important role of assessment in providing high quality programs for young children. Consistent with the recent National Academy of Science report *Early childhood assessment: Why, what, and how?* NAEYC advocates for the appropriate use of high quality assessments to support instruction and to provide important feedback on child progress and program effectiveness based upon their design. However, we echo the cautions raised within the NAS report about the current state of assessment science, including the uneven availability of quality assessment tools that measure all domains relevant to early school success and appropriateness for diverse populations of children.

Too many children do not receive a developmental screening that would lead to more effective services and strategies to help them develop and learn to their potential. Reports from the American Academy of Pediatrics consistently reveal that children are not being screened for risk of developmental or learning delays, despite efforts in both the early childhood and pediatric communities. Early childhood programs and school programs should be collaborating with professionals who provide developmental screenings and additional diagnostic assessments as warranted, to ensure early identification of children who may benefit from additional services.

Increasingly states have begun to develop kindergarten entry assessments. Recipients of grants under the Early Learning Challenge will be reviewing and revising their systems both in terms of instrument selection to capture all domains, implementation, and professional development, and appropriate use. NAEYC recently released a report *Developing Kindergarten Readiness and Other Large-Scale Assessment Systems* (<http://www.naeyc.org/resources/research/kreadinessassessment>) to guide states on the development of statewide and large-scale assessment systems that underscores the need to consider assessment systems and to place of such systems within the larger context of early childhood programs within each state. The report includes guidance on the identification of domains to be measured within a kindergarten entry assessment, as well as parameters for how the resulting data may be used that are consistent with the design and psychometric integrity of the assessment. However, "a broad range of domains" lacks specificity as to what constitutes a domain. While states have adopted the Common Core in two domains, NAEYC urges states to address the other broad-level

domains such as approaches to learning, social and emotional development, physical development, and other content areas. It should be noted that within each of these broad domains are critical divisions that underscore differences between children that are indicative of school success and later outcomes. For example, the broad domain of social and emotional functioning includes within it more specific domains, including executive functioning, behavior regulation, emotion regulation, etc. Similarly, the broad domain of reading (or literacy) includes within it important component domains.

NAEYC's report on statewide assessment systems highlights the purposes for assessment (also included in the National Academy of Science report). However, it must be noted that each of the purposes indicated in the report may require its own assessment system to ensure alignment between the assessment design and its purpose within a comprehensive assessment system. Also, it is possible for states to have these assessment systems in place, but without integration, data gained from one assessment system, regardless of quality, will fail to inform the larger early education system. Strategies for integrating data from across assessment systems should be included amongst the goals, including considerations of differing models and processes that may link data.

### **III. Goal 5: Continuous Improvement of the U.S. Education System**

#### **Sub-Goal 5.1: Data Systems**

The intentional collection and utilization of data within a comprehensive data system is ambitious from a technical standpoint, although progress has been made with recent efforts to build statewide comprehensive systems. This increasing technical capacity carries with it important considerations about the protection of data and data confidentiality. NAEYC recommends that the federal government, states, and localities that require and collect data use the following questions to frame and guide decisions in this area:

- What is the status of data collected on individuals, under these goals from early childhood, through college age?
- What are the legal requirements for child assent, and later adult consent, for retaining data?
- How are data to be safeguarded (data security) and held confidential (confidentiality)? Finally, once data are collected and linked, in what ways will there be safeguards to ensure that any resulting data analyses are consistent with best practices in the research community?

#### **Sub-Goal 5.2: Research and Evaluation**

NAEYC consistently supports the application of research to practice, and is encouraged by goals under this section to develop strategies to more closely connect research and education practice. Biomedical research uses a model of “bench to bedside” to underscore the importance of research to the practice of medicine, and the National Institutes of Health developed programs and supports, including competitive grants and contracts, to build the capacity for researcher and practice to be linked. Similar efforts are underway at the Department through the What Works Clearinghouse and through efforts in many of the funded regional labs. But these efforts are still not penetrating practice as

deeply as they could. Nor are they always responsive to the needs of educators who are increasingly demanding to know the research behind specific practices. Too often, when we try to connect research and practice, we utilize a dissemination model which focuses on bringing research to practice. While the steps laid out by the Department under this goal are powerful, we encourage the Department to also look to other federal agencies, state and local efforts, and private industry for additional models on forging the connection between research and practice as one of two-way communication.

We welcome the opportunity to discuss these comments and provide additional resources in the future.

Sincerely,



Jerlean Daniel, Ph.D.  
Executive Director