

National Association for the Education of Young Children

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Enhanced Assessment Grants - Comments
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The Honorable Arne Duncan
Secretary of Education
U.S. Department of Education
400 Maryland Avenue SE
Washington, DC 20202

Office of Elementary and Secondary Education
U.S. Department of Education
400 Maryland Avenue SW, Room 3W110
Washington, DC 20202

The National Association for the Education of Young Children (NAEYC) is pleased to respond to the request for comments published in the January 25, 2013 Federal Register regarding Enhanced Assessment Instruments published in the *Federal Register* (Jan. 25, 2013, Vol. 78, No. 14, pp. 5337-5345).

Proposed Priority 1: Development of Kindergarten Entry Assessment

NAEYC supports the use of multiple assessments that are valid and reliable for the purpose they are being used, in order to help program staff improve children's learning and development. NAEYC's joint Position Statement with the National Association of Early Childhood Specialists in State Departments of Education states the field should "make ethical, appropriate, valid, and reliable assessment a central part of all early childhood programs. To assess young children's strengths, progress, and needs, use assessment methods that are developmentally appropriate, culturally and linguistically responsive, tied to children's daily activities, supported by professional development, inclusive of families, and connected to specific, beneficial purposes: (1) making sound decisions about teaching and learning, (2) identifying significant concerns that

may require focused intervention for individual children, and (3) helping programs improve their educational and developmental interventions.¹

We are pleased that any assessment designed with this grant would be required to address all domains and not just the Common Core domains of literacy and math. We are pleased that the assessment cannot be used to deny entry to kindergarten at legal age, although we strongly recommend explicit prohibitions for other inappropriate uses as detailed in our comments below. We are pleased to see that this Notice re-states Congressional intent that the use of child assessments should conform to the recommendations of the National Academies of Sciences reports on child assessment, which include a variety of cautions as well as positive uses of child assessment.

NAEYC also has provided guidance to states on developing kindergarten entry assessments and other large-scale assessments systems, “Developing Kindergarten Readiness and Other Large-Scale Assessment Systems” (2011) at www.naeyc.org/resources/research/kreadinessassessment.

Our comments focus on the approach that should be taken by the grantee of this project in the development of the kindergarten entry assessment, and ultimately the opportunities as well as cautions for its utilization.

Departments of Education and Health and Human Services Should Coordinate on the Application and the Awarding of Grants

We are pleased that the Departments of Health and Human Services and Education coordinated efforts on the application for the Early Learning Challenge grants and on technical assistance efforts. We strongly urge you to use the same coordination between the agencies for these grants, especially in light of the 14 states that received Early Learning Challenge grants and have been working on developing or improving their existing kindergarten entry assessments.

An Assessment Cannot Be Well Designed for Multiple, Differing Purposes

Experts on child assessment repeatedly emphasize that assessments must be matched to a specific purpose. An assessment instrument may be valid and useful for one purpose and not another. The Notice states that the yet-to-be developed assessment would serve three distinct purposes: helping kindergarten teachers improve instruction in the kindergarten year; helping policymakers target funding; and helping families understand their children’s learning. As it is written, there is danger that states will develop a single assessment tool or procedure (or adopt an available one) in an effort to meet these multiple needs, yet the result will be an approach that is only technically sound in meeting a more limited purpose.

¹ National Association for the Education of Young Children & National Association of Early Childhood Specialists in State Departments of Education. 2003. “Early Childhood Curriculum, Assessment, and Program Evaluation: Building an Effective, Accountable System in Programs for Children Birth through Age 8.” Joint Position Statement. Washington, DC: NAEYC; NAECS/SDE. Available at www.naeyc.org/files/naeyc/file/positions/pscape.pdf.

Assessments Should Not Be Used as a Substitute for Comprehensive Learning Standards

In the early grade years, children remain on a path of development that requires attention and support to their emotional, social and physical development and to their creativity, curiosity and tenacity (approaches to learning). These areas are inter-related with children's literacy, math and science learning in the early grades. A large number of research studies have linked emotional competence to both enhanced cognitive performance and academic achievement.² Unfortunately, many states do not have standards that have been developed for kindergarten, first and second grade that reflect the breadth of the array of domains needed for children's learning success.³

While the Race To The Top Early Learning Challenge Grant and this Notice state that the kindergarten entry assessment must address all domains of learning, there are only two states with easily identifiable standards for kindergarten children across all domains. Most states have adopted the Common Core for English language arts and mathematics, but almost every state lacks standards in kindergarten for social and emotional development and approaches to learning. In terms of *vertical alignment*, the kindergarten and prekindergarten standards should not involve backmapping or scaling backwards standards from the higher grades. Instead, standards should be specific to each grade and based on research about the processes, sequences, and long-term outcomes of early learning and development.

The National Research Council report, *Early Childhood Assessment: Why, What, and How* notes that

“...A parallel effort to raise the attention of practitioners in the K-12 arena to the importance of social/emotional development and approaches to learning not only would improve the learning environment for elementary children, it would create a better environment to address alignment issues.”⁴

We strongly urge the Department to include in any application an assurance that the state will review and revise their kindergarten standards to address all domains (cognitive, social, emotional, physical, and approaches to learning) using a forward progression of standards development in which each grade's standards are grounded in the development of the age of children in that grade and reflect the breadth of areas of development as well as cognitive

² See, e.g., Linares, L.O., N. Rosbruch, M.B. Stern, M.E. Edwards, G. Walker, H.B. Abikoff, & J.M.J Alvir. 2005. “Developing Cognitive-Social-Emotional Competencies to Enhance Academic Learning.” *Psychology in the Schools* 42 (4): 405–17.

³ Kauerz, K. 2006. “K-2 Standards and Assessments: A 50-State Review.” Prepared for The National Early Childhood Accountability Task Force. Available at www.pewtrusts.org/uploadedFiles/wwwpewtrustsorg/Reports/Pre-k_education/kauerz%20K_2%20Paper_TSformatted_12Jun06.pdf.

⁴ National Research Council. 2008. *Early Childhood Assessment: Why, What, and How*. Committee on Developmental Outcomes and Assessments for Young Children, C.E. Snow, & S.B. Van Hemel, eds. Washington, DC: The National Academies Press, 427.

domains to ensure learning success. This standards work must precede assessment development and utilization.

Assessments should not be the determinant of curricula. Standards create a “domino effect” for development and alignment of curriculum, assessments, professional preparation and ongoing professional development of teachers and school administrators. Because all but a few states lack kindergarten standards in all domains, there is a danger that the assessment tool(s) will define the standards, rather than the standards shaping the assessment tool(s).

Using Kindergarten Entry Assessments to “Backmap” for Accountability Is Highly Problematic

A grave concern for experts in the early childhood field is that kindergarten entry assessments will be used as a means of evaluating programs or services children may have received prior to school entry. The possibility that “a high-quality KEA should provide information to support effective programmatic decisions and better target investments in the years before kindergarten” suggests that the assessments will be used to make such evaluative judgments. Using these data as a means of evaluating prior experiences is extremely problematic for a number of scientific and developmental reasons, but we highlight the two largest here.

First, we know that child participation in any early childhood program, its type (center, family, etc.), intensity (number of hours per day or week), and duration (how long has the child participated) are all correlated with a number of family factors, many of which also predict young children’s school readiness. Using children’s assessment scores when entering kindergarten to evaluate their prior experiences does not consider that children are not randomly enrolled in programs, nor does it consider that they have had widely different experiences prior to kindergarten and that the children themselves have varied characteristics. In either case, the result is a non-valid evaluation of the quality of the programs. A more direct evaluation study should be designed, funded, and completed, if the intent is to test the effectiveness of each early childhood program on promoting school readiness or holding programs to some expected level of child outcomes.

Second, children’s skills and abilities at any given time reflect an accumulation of opportunities and experiences interacting with innate characteristics. Children’s abilities and skills when entering kindergarten reflect not just on the child’s experiences in the year prior to kindergarten, but all the years prior to school entry, as well as factors in the child’s prenatal development. Using kindergarten entry assessments in an effort to evaluate only one aspect of that developmental history lacks scientific validity.

Using child assessments to make funding decisions about programs fails to take into account the multiple settings and experiences (in homes and in programs) of children prior to kindergarten. It would be inappropriate for the kindergarten entry assessment to be used as an evaluation of the

programs themselves, as it may be impossible to tease out which program and which setting had the most or the least benefit to children’s development and learning. However, our concerns about the use of kindergarten entry assessments as a means of evaluating early childhood programs and “better targeting investments” does not mean that data resulting from such assessments cannot be used “to support effective programmatic decisions.” Indeed, describing patterns of children’s differing strengths and needs as they enter kindergarten can provide valuable guidance in how to target funding to enhance early learning opportunities. These data can also inform curriculum and instructional decisions for kindergarten and the early grades. Some states have used the aggregated information for investing in professional development rather than punitive responses to programs, teachers and children. We believe that is the approach that should be taken if the assessment information is to have positive value.

Prohibition on Inappropriate High-Stakes as Recognized by the National Research Council Reports

NAEYC promotes appropriate assessment of children to inform teaching practices and services so that every child will succeed. *For kindergarten to third grade, as well as for younger children, the use of child assessment to determine teacher and principal retention and compensation is a high-stakes, inappropriate use of child assessment.* National organizations and numerous experts in addition to NAEYC also oppose the use of high-stakes assessment in the early grades of school and the preschool years.⁵

The Notice provides only one purpose for which the kindergarten entry assessment cannot be used: preventing children’s entry into kindergarten. We concur, but believe that is not the sole inappropriate use of child assessments in kindergarten or in the span of birth through age 8. We urge you to refer to the following pages of the National Research Council report, *Early Childhood Assessment: Why, What, and How* (2008) with cautions on the inappropriate overreaching use of child assessment in accountability and other high-stakes contexts: pages 10-11 and 258-259.

The unintended consequences of using assessments of children in kindergarten through the early grades for teacher, principal, and school accountability and associated incentives can lead to undue pressure on children to learn test taking-skills rather than comprehensive and critical thinking skills (the skills needed for 21st century jobs), teachers “teaching to the test,” which could narrow the curriculum, and inaccurate reflections of children’s real abilities.⁶

Teachers and principals should be accountable for children’s learning and educational progress; however test scores for younger children are not as reliable sources of information on “effectiveness.” By determining high-stakes outcomes for teachers based primarily or solely on

⁵ See, e.g., American Education Research Association www.aera.net/policyandprograms/?id=378; International Reading Association www.reading.org/General/AboutIRA/PositionStatements/HighStakesPosition.aspx.

⁶ Pianta, R.C. 2007. “Measure Actual Classroom Teaching.” *Education Week* 27 (11): 30–36.

child assessment outcomes, other critical skills for teachers will be diminished in value and use. Effective teachers know how to use the curriculum and instructional assessments to support each child's learning and to engage families as partners in children's development and education. Placing such emphasis on test scores for children entering kindergarten will potentially lead to more unnecessary, inappropriate, and burdensome testing and "test prep."

Lack of Alignment with Other Early Childhood Systems

This Notice describes grants intended to support the development and (in some ways) implementation of a kindergarten entry assessment as a component of a larger assessment system. However, the assessment fits into a larger delivery system, and decisions made around assessments have effects on early childhood education beyond assessments systems.⁷ This larger early childhood education system includes learning standards (as noted in the proposed application requirements), as well as teacher preparation standards, and ongoing training and professional development. In short, assessments must be guided by comprehensive early learning standards, and inform instruction and practices used by adequately prepared professionals. A vital kindergarten entry assessment cannot compensate for limitations in these other critical system areas.

Need for Professional Development and Quality Resources

As noted above, any assessment tool and assessment system exists within a larger educational delivery system. So, providing training necessary to conduct assessments (whether they be by newly hired and trained assessors, or through training of existing personnel) is only one aspect of training and professional development necessary to relate an assessment system to the larger delivery system. In addition to training assessors, it is imperative that there be resources for states to provide additional professional development to kindergarten teachers on how to use the results of a KEA for improving instruction in the kindergarten year. This is the appropriate use of assessment for "targeted investments." Further, early childhood programs serving children younger than kindergarten usually lack the resources that would help them meet and sustain high-quality measures for serving all young children. Without these resources, we will continue to assess children while knowing that we are not giving them and the professionals working with them the tools and resources they need to succeed.

Proposed Priority 2: Consortium of States Application

While NAEYC supports states learning from each other on a peer-to-peer basis, the variation of state policies supporting good access and high-quality services is extremely wide. NAEYC does not believe that the quantity of states working together is the best way of determining a high-quality application. Instead, the application should include how the states in the proposed

⁷ Snow, K.L. 2011. "Developing Kindergarten Readiness and Other Large-Scale Assessment Systems: Necessary Considerations in the Assessment of Young Children." Washington, DC: National Association for the Education of Young Children. Available at www.naeyc.org/resources/research/kreadinessassessment.

consortium have used their funds (federal and state) to create high-quality programs across all settings serving young children; affordable child care and provider reimbursement rates that support quality services; training and professional development opportunities including degrees and credentials; access to quality programs starting with infants and not just prekindergarten age programs; and equitable, high-quality policies for the kindergarten year.

Further, the Notice states that the consortia applicants would adopt a set of early learning standards for the year prior to kindergarten. States have done this work, and many have used that of other states and the Head Start Child Outcomes Framework for designing them. As said above, what the majority of states lack is comprehensive learning and development standards for the kindergarten year. The Common Core address only language arts and math, and yet children's learning (prior to, during, and after kindergarten) requires attention to social, emotional, and physical development as well as approaches to learning standards. (See NAEYC's report "Variation in Children's Experience in Kindergarten and the Common Core" at www.naeyc.org/files/naeyc/CommonCore_KVariation.pdf.)

Sincerely,

A handwritten signature in cursive script that reads "Jerlean Daniel". The signature is written in black ink and is positioned below the word "Sincerely,".

Jerlean Daniel, Ph.D
Executive Director