

May 25, 2016

The Honorable John B. King, Jr.
United States Department of Education
400 Maryland Ave. SW

Washington, DC 20202

Dear Secretary King:

Child Care Aware® of America appreciates the opportunity to respond to the request for comments on how the Department of Education could provide non-regulatory guidance to state and local educational agencies (SEAs/LEAs) on implementation of early learning programs in the Every Student Succeeds Act of 2015. These comments are provided on behalf of Child Care Aware® of America, a membership organization of 450 Child Care Resource and Referral (CCR&R) agencies who serve nearly 100% of all U.S. zip codes.

Research shows that investment in early childhood development is one of the best investments that we can make to prepare a child for success in school and in life. ESSA is an important contributor to this investment by providing states additional opportunities to leverage and expand their resources thru preschool development grants. Coordination and collaboration between school early childhood programs, LEAs and SEAs can be an important ingredient to ensuring effective and seamless transitions from pre-school to Kindergarten and beyond.

As state and local educational agencies prepare to implement the provisions of the law, it will be helpful for the Department to help states identify opportunities to utilize new and existing resources that can be applied to develop, support, and expand, high-quality early childhood development programs in their states. This will be especially important given the disparity in early childhood funding that exists between states, and even within states, made more challenging by the Federal government’s reduced role in education. Helping states identify funding opportunities, as well as examples of high-quality programming throughout the country for SEAs and LEAs to consider, is critical.

The following are Child Care Aware® of America’s (CCAoA) specific comments that we ask the Department of Education to consider when authoring its guidance to SEAs and LEAs.

**Title I**

Under ESSA, states are required to submit plans to the Department detailing how they intend to use Title I funds to support LEAs, and LEAs must detail how investments will improve student performance and outcomes for each activity. CCAoA strongly encourages the Department of Education to provide a list of promising, successful early child development programs including examples of effective:

* Pre-K/ child care partnerships;
* Before, afterschool and summer programs;
* Programs that address the needs of rural communities;
* Methods that have been successful in expanding access to quality education and care;
* Programs that support “nontraditional” working hours of parents and caregivers;
* Programs and strategies to improve language and cultural competencies; and
* Activities that promote high-quality literacy and STEM programs.

Strong programs with proven outcomes for children should always be our priority. This is especially important for our nation’s most vulnerable children who cannot afford to have gaps in learning. Accountability for how we utilize scarce taxpayer resources is essential. However, as we seek to measure program performance we have to make sure assessments utilized for evaluations are appropriate. Therefore, we strongly encourage the Department to identify and provide guidance to states on adopting developmentally appropriate early learning assessments, as is allowed under Title I.

While universal access to high quality programs is an ultimate goal, the fact of current state, local, and federal limitations require us to target resources to those most in need. To this end, the Department should encourage SEAs and LEAs to prioritize funding programs in communities with the highest levels of poverty, as well as for those with the greatest need for the most qualified and effective teachers and early childhood educators.

**Title II**

Title II of ESSA provides a promising opportunity for states to use resources to build, strengthen, and expand early learning programs through a set-aside to support professional development of staff. The Department should also identify how LEAs could use Title II funding for professional development activities for early childhood educators, as well as for projects that help young children transition from child care/ Pre-K to Kindergarten and whether and how States and local school districts could also use Title II funding to build and improve programs serving English/ dual language learners in both Pre-K and child care settings.

Additionally, the ESSA law authorizes a new a literacy program under Title II to support state and local efforts to create comprehensive literacy programs from birth to 12th grade. CCAoA strongly supports this new program and believes that, as with Title I, SEAs and LEAs should target the resources from this program to communities with the highest levels of poverty.

**Preschool Development Grants**

CCAoA applauds the work of the Administration and Congress in including an authorization for this program in ESSA. While the Department of Health and Human Services is the lead agency in administering this program, we encourage the Department of Education to provide use its authority to provide guidance and recommendations to programs, states and school districts within its jurisdiction.

Specifically, we ask that the Department of Education encourage the current practice of many states to fund full-day Pre-K programs and to pay for educators comparably to salaries of K-12 teachers. Under ESSA, the Secretaries of HHS/ED can choose to renew grants for states that are currently being funded through this program that would allow states to expand existing programs, as well as create new early education initiatives. However, under the new law, the Federal government cannot mandate any quality indicators for newly created programs for both existing grantees, which could negatively affect plans for future full-day Pre-K programs and initiatives regarding increased compensation.

In addition, as is the case with many competitive grants, CCAoA is concerned that funds will primarily be directed towards states that already have the infrastructure to expand programs, leaving many states, especially those with the most need, behind.

Lastly, ESSA includes a “Sense of Congress on Early Learning and Child Care,” where it appears that Congress defines early learning as a responsibility at the state level. Child Care Aware® of America believes supporting strong early childhood development programs is a responsibility for all, including local, state and Federal governments. We therefore ask that you send a strong signal and include language emphasizing the importance of a strong early learning foundation, especially for ages birth to five.

I appreciate your consideration, and again, we appreciate the opportunity to submit these comments.

Respectfully,



Lynette M. Fraga, PhD.

Executive Director