



First Five Years Fund

October 8, 2014

The Honorable Arne Duncan
Secretary of Education
United States Department of Education
400 Maryland Ave, SW
Washington, D.C. 20202

Dear Mr. Secretary:

The First Five Years Fund (FFYF) appreciates this opportunity to respond to the U.S. Department of Education's proposed revisions to the Elementary and Secondary Education Act's School Improvement Grants (SIG) program. We believe strongly in the need for increased federal investments to support access to high quality early childhood education for children birth through age 5 because of the role it can play in supporting a child's school readiness and future success in school and life. We therefore applaud your recognition of high quality early learning as a core school improvement building block. The Department's proposed Early Learning Intervention Model - if well implemented and integrated with other sound school improvement practices – could meaningfully contribute to the SIG program's long term success.

As you know, the nation's persistently lowest performing schools predominantly serve communities characterized by extreme poverty and a range of other challenges that impact children's early development. Children in these communities typically lack access to basic nutritional, educational, healthcare and other supports leaving them developmentally years behind more economically affluent peers. Fortunately, access to high quality early childhood education can help these children by promoting growth across a range of domains, including their physical, social and emotional, cognitive and language development. This boost can help low-income children successfully transition to elementary school, and succeed later in life, while also cultivating learning environments and conditions that can help persistently low performing schools better serve them and their peers.

In light of these advantages for young children and the schools that serve them, we strongly support the Department's proposal to emphasize developmentally appropriate early learning in the SIG program. As you finalize the program's new requirements, we urge you to consider the following recommendations for helping school districts and states properly integrate early learning into their broader school improvement strategies.

Maintain and Strengthen the Early Learning Intervention Model (ELIM) in the Final SIG Regulations.

Research shows that access to high quality early childhood education can help young children successfully transition to elementary school by promoting their growth across a range of developmental domains. Helping these children prepare for later learning experiences will in turn support the establishment of better learning conditions and opportunities in the nation's persistently lowest performing schools. Therefore, we strongly urge you to maintain the Early Learning Intervention Model

in the Department's final SIG requirements. We also respectfully recommend that you strengthen the ELIM by:

- **Ensuring that educators working in SIG schools that adopt the ELIM are properly trained and supported to work with young children.** School and district staff working with children birth-to-four must be fully trained and equipped to support the physical, social and emotional, cognitive and language development needs of children at these younger ages. With that important goal in mind, the ELIM's proposed joint planning across grades should include collaboration and professional development designed to ensure that educators serving in SIG schools have the capacity to serve children across the range of developmental domains. Absent properly trained staff, the ELIM will not achieve its full potential to improve outcomes for young learners.
- **Recognize community providers** as potential partners in implementing the ELIM in SIG schools. In many instances, existing early learning providers play a vital role in serving the neighborhoods where states target their SIG investments. Encouraging and fostering strong connections between high quality community programs and SIG schools will promote the ELIM's implementation with fidelity to the Department's requirements and vision, while also enabling more rapid and efficient use of the program's resources, particularly in SIG schools that need time to build the capacity of their leadership and teams to work with young children.
- **Emphasize home visiting as an express element of the ELIM** to connect families with trained district, school, or community professionals who can help them through pregnancy and their children's first years. School districts presently choose to use ESEA Title I and Title III investments to support home visiting models because they recognize the positive impact that such programs have in meeting desired outcomes such as increased parent engagement and kindergarten readiness. For example, the Dallas, Texas, Houston, Texas, and Fairfax County, Virginia school districts (among others) are supporting Home Instruction for Preschool Youngsters (HIPPI) initiatives with ESEA resources. ESEA resources are also being used as part of Parents as Teachers initiatives in Missouri, Kansas, Iowa, Oklahoma, Connecticut, Pennsylvania, Delaware, Washington, and Wisconsin.

Well-designed home visiting systems are demonstrated to improve child and family outcomes, by increasing parents' ability to support their children's development and success. Expressly integrating home visiting into the ELIM will not only strengthen the model, but it also aligns with the Administration's broader home visiting priorities as part of the continuum of early learning initiatives and investments.

Ensure ELIM is recognized as One Element of a Systemic Improvement Strategy and not an Independent School Improvement Solution

Providing high quality early learning opportunities is an important step for helping struggling schools better serve students and their families, but early learning must be part of broader, long term, continuous improvement strategy. School districts and states must not assume that implementing the ELIM will, on its own, turnaround a persistently low performing school. Overcoming SIG schools' often wide ranging and complex challenges will require a comprehensive and sustained strategy that begins with our youngest learners and their families and follows them through graduation. District and school leaders



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must undertake a thorough planning process that strategically connects the Model to other policies and practices they intend to implement as part of their school turnaround strategy. After developing a comprehensive approach, SIG grantees must ensure that sufficient funding is allocated to support achieving the model's core elements and quality standards. Absent such a systemic approach, the Model will not be able to deliver the outcomes envisioned by the Department.

Update the Metrics used to Evaluate School Improvement Initiatives

The Department should use the new SIG regulations as an opportunity to articulate appropriate metrics of school turnaround progress and success. We echo the Ounce of Prevention's new recommendation calling for the adoption of metrics that can be used prior to third grade. Shifting the focus of measurement from standardized test scores to professional practice allows the success of turnaround to be measured starting in kindergarten or earlier, which allows schools to reap the benefit of early learning investment almost immediately. Continued overreliance on English language arts and mathematics test scores in 3rd Grade will discourage turnaround leaders from investing in ELIM or other early learning strategies.

Thank you for carefully considering our recommendations. We appreciate the Department of Education's commitment to making high quality early learning a core part of future SIG competitions. Please let us know if we can provide any further information about the recommendations above or other high quality early learning issues facing the Department.

Sincerely,

Executive Director
First Five Years Fund