



## First Five Years Fund

---

January 21, 2016

The Honorable John King  
Acting Secretary  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, D.C. 20202

### ***Request for Information: Implementing Programs under Title I of the Elementary and Secondary Education Act***

Dear Acting Secretary King:

The First Five Years Fund (FFYF) is pleased to submit comments responding to the U.S. Department of Education's Request for Information regarding implementation of Title I of the Elementary and Secondary Education Act, as recently amended by the Every Student Succeeds Act (ESSA). ESSA aspires to strengthen and expand connections between high quality early learning programs and elementary schools. Congress carefully embedded early learning across ESSA, including in the law's planning, coordination, reporting, family engagement, and professional development provisions. Importantly, the law also authorizes an important new preschool initiative, while continuing existing literacy and other programs, such as Promise Neighborhoods, which focus needed attention on the nation's youngest learners and their families.

Federal, state, and local efforts to implement ESSA's early learning provisions will be critical to achieving Congress's vision for ensuring more young children receive the educational opportunities they need to succeed. Successful policy implementation begins with well-designed federal rulemaking and guidance that takes into account the good work already happening at the state and local level.

FFYF respectfully encourages the Department of Education to recognize the law's early childhood provisions and provide informed guidance to assist state and local educational agencies in their efforts to implement the law. We believe this will enable states and local educational agencies to strengthen early learning and better align early childhood programs with elementary school, while also giving elementary programs the opportunity to adopt best practices from the early learning years. With that objective in mind, we urge you to consider the following recommendations during ESSA's critical initial implementation.

#### **Sec. 1112(b)(8) – Local Educational Agency Plans**

**FFYF Encourages Local Educational Agencies to use Title I Funding to Support Early Learning.**



## First Five Years Fund

---

The Department's implementation strategy should encourage states and districts to use Title I funding to provide high quality early learning opportunities and advice about how to ensure such investments promote quality and alignment with elementary school. Establishing aligned educational pathways for young children from birth through early elementary school is a valuable down payment on student's later academic and life success. Achieving this goal begins with helping state and local educational agency Title I plans include a focus on promoting alignment consistent with successful models and recent research. Among other steps, the Department should encourage states and districts to develop birth to third grade models that reflect their community's unique culture, resources, and context with a focus on cultivating school readiness and a successful transition into early elementary school.

The Department can help districts successfully tailor models to meet local needs by highlighting existing districts' approaches and recent research. One example, of evidence based approaches is the work led by University of Washington researchers, Kristie Kauerz and Julia Coffman, whose *Framework for Planning, Implementing, and Evaluating PreK-3<sup>rd</sup> Grade Approaches (2012)*, offers a blueprint that can help guide effective use of Title I for early learning. The paper uses the term "PreK" as a general term referring to all of the learning-based programs children experience prior to kindergarten and suggests eight interconnected activities associated with designing an aligned approach to planning stronger early childhood through early elementary experiences. The eight areas include goal setting and recommendations for: (1) teachers, (2) instructional tools, (3) learning environments; (4) data-driven improvements; (5) family engagement; (6) continuity and pathways; (7) cross-sector work; and (8) administration.

FFYF also encourages the Department to provide guidance to districts regarding ESSA's requirement that use of title I resources for early learning must comply with the Head Start program's performance standards. FFYF support that ESSA retains this requirement to focus on ensuring Title I resource use adheres to quality standards. Many school districts lack internal staff with knowledge and experience with the Head Start program's performance standards. Furthermore, the Department of Health and Human Services currently has an open rulemaking designed to strengthen these standards, which will necessarily require training and assistance across the early learning system to ensure professionals are equipped to implement the new standards. We urge you to work closely with the Department of Health and Human Services to deliver guidance to states and districts about effectively meeting the Head Start Program's standards, so that Title I resources used for early learning have the greatest possible impact on young learners and their families.

### **SEC. 1111(g)(1)(N)(4)(h) – State Report Cards**

**FFYF supports including birth through 5 Programs in Required State Reporting on the Number and Percentage of Students Enrolled in Preschool.**



## **First Five Years Fund**

---

Research shows that learning begins at birth and that high quality infant and toddler services strongly impact a child's development. ESSA requires State's Title I report cards to report on the number and percentage of students enrolled in preschool. The value of ESSA's reporting requirements for families, communities, school leaders, and policy makers will be significantly magnified if the Department broadly defines preschool to include all ages prior to Kindergarten and data truly describes the preschool services offered to their communities. Many states and districts are already using Title I for a range of programs birth through 5. Unfortunately, while many states collect early learning data, such collections are often uncoordinated, often incomplete, and therefore cannot effectively support efficient coordination. The absence of sound data hampers states' abilities to effectively answer policy questions about their early learning systems. We urge the Department to evaluate the recommendations of the Early Childhood Data Collaborative as a source of additional guidance for states and districts related to Title I's early learning data reporting requirements.

### **SEC. 1010 - Parent and Family Engagement**

#### **FFYF recommends supporting Districts to Include Early Learning Families in the Family Engagement Activities Supported by Title I.**

The new law calls on districts to provide professional development for district and school personnel regarding parent and family engagement strategies, including joint professional learning with early childhood educators. Effective parental engagement is an important component of high quality early learning programs and many early learning family engagement strategies have direct application and value in the early elementary grades. Joint professional development between early learning educators and elementary teachers and leaders will not only enhance the capacity of the early learning workforce, but also help equip elementary school teams with knowledge and skills drawn from lessons of the early learning system. Embedding early learning focused family engagement strategies in relevant federal Title I guidance will help ensure that families are actively and systematically engaged in their children's education, along the full birth to third grade continuum, as a core instructional strategy.

### **SEC.1111(c)(4)(B)(v)(I) – State Plans - Indicators**

#### **FFYF encourages the Use of the School Quality Indicator to Place Focus on the Early Years.**

FFYF commends the inclusion of early learning in state accountability systems as an "indicator of school quality or student success" beyond statewide assessments because it is an opportunity for states to measure the quality of education in the years prior to third grade. Under NCLB, state accountability focused heavily on the years in which statewide testing took place. Under ESSA, states have the opportunity to place greater focus on the earlier years in consideration of school quality indicators. Federal guidance has the potential to help states to take advantage of this opportunity in at least two ways: (1) encouraging states to use indicators that can be



## First Five Years Fund

---

applied across all grades – such as observational measures of instructional quality – that allow the K-2 years to be measured on an equal footing with later years; and (2) ensuring that states are allowed to disaggregate “school quality” scores by grade, and are also allowed to specify that each grade within a school can be given a specific weight in the overall accountability formula. For example, instead of assigning a single “school quality” score to a whole K-5 school, the state could use quality measures that allow it to assign a score to each grade within that school – and then add those grade scores up into a composite school quality score. This would help ensure that the students in the early grades receive the same academic attention compared to the grades in which standardized tests are administered.

### **SEC. 1003 (e)(1)(A) – School Improvement**

#### **FFYF encourages States and Districts to Consider High Quality Early Learning as a Element of their School Turnaround Policies and Practices.**

We know with certainty that the achievement gap begins early. High quality early learning programs, however, can make a big difference in a child’s ability to learn and develop. We support that ESSA grants states and localities direct decision-making authority over how to turnaround the nation’s lowest performing schools. The Department can help provide resources to help inform this process by offering guidance to school districts about including early learning in ESSA’s required needs analysis that inform subsequent state and local decisions about strategies geared toward turning around struggling schools. Research suggest that a thoughtful and deliberate approach prior to students’ kindergarten entry plays a critical role in later school success.

In addition to building capacity to successfully integrate early learning into school turnaround, states should also rethink the indicators used to identify low performing schools and later measure their progress. States and districts should be encouraged to find ways to use developmentally appropriate, non-assessment measures for integrating the early elementary grades in accountability systems. States could in fact align these measures with the school quality indicator now required to be part of school accountability scores under ESSA. Using these measures as part of school turnaround can help support sustained success in those efforts; as the Ounce of Prevention has written:

“[T]he goal of title I’s turnaround funding is to put schools on a trajectory to long-term success, but the metrics used to measure short-term success in turnarounds effectively eliminate the viability of a potentially important long-term improvement strategy. Accountability metrics that address early learning and the K–2 years will not only give turnaround schools a much more precise understanding of what is occurring before 3rd grade, they will encourage schools to address any challenges immediately. While early learning may not be the right solution in every turnaround elementary school, changing the metrics of turnaround to make it a viable option



## First Five Years Fund

---

would have beneficial short- and long-term impacts in some of the nation's lowest-performing schools."

### **SEC. 2103(b)(3)(G)(ii) – Local Uses of Funds**

#### **FFYF recommends the support and encouragement of District Efforts to build Elementary School Professionals' Capacity to Support the Transition to Kindergarten and Deliver a Comprehensive Birth to 5 Framework.**

Ensuring that birth to third grade teachers have the tools necessary to provide high quality instruction and effective experiences for children, and that school leaders understand and support this vision, is critical for student success. ESSA reflects the importance of supporting professional development opportunities about early learning best practice, including ensuring a seamless transition from early learning settings to elementary school. We encourage the Department to ensure that guidance and regulations designed to implement the law's professional development provisions, which are strategically embedded across the law, promote: (1) joint learning opportunities for early childhood and elementary educators and (2) early learning best practices, including promoting alignment along the birth to third grade continuum.

Thank you for providing this chance to provide initial recommendations to support the ESSA implementation process. We look forward to working with the Department to ensure that the law's early learning provisions achieve their full potential for promoting educational equity, including ensuring all students enter kindergarten ready to succeed.

Sincerely,

Kris Perry  
Executive Director

