



COMMENTS SUBMITTED BY NAECS-SDE TO THE US DEPARTMENT OF EDUCATION ON THE PRESCHOOL FOR ALL HOMEROOM BLOG – FEBRUARY 26, 2014

Thank you for the opportunity to comment on the new competition to support States, including the District of Columbia and Puerto Rico, to build, develop and expand high-quality preschool programs.

The NAECS-SDE is a membership association consisting of individuals working predominantly in state departments of education (SEAs) who have responsibilities for state and federal programs which impact the lives of young children. Our members deal with the individual governance structures, the politics and policies that are true for their own state, some of which have precluded them from participating in current Race to the Top-Early Learning Challenge competitions. Thus we support (1) **specific pillars** for consideration, and (2) as much **flexibility** as possible so that the Administrations (ED and HHS) can meet their challenge to award these funds for both low-capacity states, as well as high-capacity states.

What are the pillars that need to be maintained – what minimally must be provided?

- Preschool is clearly identified as **part of the Early Childhood Continuum** (Birth through Third Grade). Linking preschool to the age groups of B-3 and K-3rd is critical. Planned transition into a preK program and the transition to kindergarten must also be clearly defined as part of the continuum. The P-3 continuum is a powerful lever for school improvement.
- The **SEA should administer the grant** and local partners should be engaged in the **coordination and collaboration of local community-based, school-based, and faith-based programs** to serve the children and families in most need of assistance. These groups take on a variety of forms in different states, some operating in the context of the Head Start Advisory Committee, others needing to be built out from other local interagency coordinating committees, while still others, due to population density (very rural on one end of the spectrum, or high-poverty urban at the opposite end).
- **An MOU between schools, local Head Start program(s), and community-based programs (include faith-based programs)** will be needed to ensure inclusiveness across sites and to promote innovative practices that result in meeting the needs of the community.
- **Address issues** that impede success in reaching those children who are most in need of services, which include: extended hours/ programming (a school day is not

a “full day” for parents); transportation issues; and, facility issues, including space for full day programs. As more states adopt full-day kindergarten programs, preschool classrooms are being displaced from school buildings, requiring classrooms or slots be identified in community-based settings.

- Require **quality teaching teams**, including trained administrators who supervise early childhood educators. Allow funding to support workforce development at all levels.
- Require a **strong focus on family engagement**—ensuring strong partnerships with parents/families around children’s education and their needs, as well as, to the extent possible, meaningful choices for parents regarding location, scheduling, support for dual language learners, etc.
- Require programs to **make data-driven decisions** that support child learning, promote positive outcomes and promote continuous quality improvement.

The flexibility within this competition may need to include:

- Ability of a state to propose a period of planning and infrastructure development in order to successfully launch their effort.
- Negotiated ability to stage the roll out of a state’s federally-supported effort. Just as many current state preK program and kindergarten entry assessment efforts began with a pilot, current low-capacity states may need to first build a platform of implementation in select communities prior to moving to others and eventually taking the program to scale, while high-capacity states may have specific elements that require focused, practiced implementation in the initial years of federal support.
- Waivers from select regulations (or new guidance) for implementation within Head Start sites. Certain members of NAECS-SDE report that there are barriers to integration of state-funded-supported children and Head Start, including big challenges and small challenges. To quote from one member:
 - Because the agencies are so worried about meeting every regulation, they are often not willing to compromise to make a partnership work. Certainly, we know that regulations are interpreted differently from agency to agency; but the sharp focus on Head Start and refunding has made folks hyper-vigilant.
 - Family-style meals. Believe it or not, quite a few partnerships have fallen apart or never started because of this Head Start regulation. In a discussion with one of our collaboration coaches we questioned the true intent of this particular regulation. Isn’t the most important factor that teachers and children sit together and have quality conversations about healthy food, what they have done that day, etc.? Yes, ideally children will eat in their classrooms; but I know of a preK where the 4 year olds go to the cafeteria before the rest of the school and sit at tables with the teacher and assistant and have a lovely meal (90% free and reduced lunch).

Thank you for the opportunity to comment on behalf of the NAECS-SDE.

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