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November 9, 2009

The Honorable Arne Duncan
U.S. Secretary of Education
United States Department of Education
Washington, DC

**Re: Investing In Innovation Notice
Docket ID ED-2009-OII-0012**

Dear Secretary Duncan:

Thank you for your invitation to comment on the Department's proposed priorities, requirements, definitions, and selection criteria for awarding the Investing in Innovation funds.

For your convenience, we provide the following summary of our comments, which in general, reflect our belief that early learning should be integrated across all four Absolute Priorities. This leads us to make the following recommendations:

1. Under Proposed Absolute Priority 4, define "PreK-3rd Learning Academies" as an Absolute Priority for failing elementary schools.
2. Under Proposed Absolute Priority 1, include PreKindergarten teachers, elementary principals, and superintendents among those who are "essential to raising educational performance among low-income students", and specifically focus on the need to insure that teachers and leaders recognize and fulfill their responsibility to insure that every American student reads proficiently by Third Grade.
3. Under Proposed Absolute Priority 2, include PreKindergarten data among the kinds of data to be evaluated and analyzed by educators.
4. Under Proposed Absolute Priority 3, support strategies that increase the reading and mathematics literacy of primary grade students by emphasizing high-quality PreKindergarten and intensive early language, literacy, and math instruction.

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5. Under Proposed Absolute Priority 4, specify that aligning and integrating high quality PreKindergarten with intensive early language and literacy instruction in the primary grades qualifies as a targeted approach to reforming persistently low-performing schools.

A. Elevate PreK-3rd Strategies to an Absolute Priority

Before and since the passage of the Elementary and Secondary Education Act in 1965, we have become all too familiar with "reforms" that have mostly been more promise than performance. Instead of defining the problems to be solved systematically, across the entire trajectory of the PreK-12 system and beyond, different states and districts have pursued unproven remedies that have resulted in few measurable gains in student performance over the past 40 years. We are morally obligated to use this unprecedented funding opportunity to invest in doing what we know will work to raise the bar for all children and to close the unacceptable achievement gap.

The first step in achieving the goals we share is to close the gap that exists at entry to Kindergarten, followed by intensive literacy, language, and mathematics instruction in the primary grades. Yet most states, districts, and the nation ignore the lessons from decades of early education research in setting their policies and allocating their resources. This must change, and the Investing in Innovation Fund provides a promising pathway for doing so.

We know for certain that during their first five years of life, most low-income children do not acquire enough vocabulary, general knowledge, or key concepts to be adequately prepared for Kindergarten. On average, their vocabulary development is 18 months behind their middle-class peers. By 4th grade, the gap has grown to two years. According to NAEP, only a third are proficient in reading. By the time of high school graduation the 50 percent of low-income children who do graduate are saddled with a vocabulary gap of four years and only about a third read proficiently. The key insight here is that the problems that manifest themselves in middle and high school have their origins in the earliest years, and that is when they must first be tackled in order to avoid cascading negative effects later on.

The effects of the "Kindergarten gap" have been narrowed significantly by providing **high-quality** PreKindergarten beginning at age three, and by connecting that experience to full-day Kindergarten and a program of Intensive early literacy, language development, and mathematics through

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Grade 3. As the Department notes: "Investing in early learning programs to prevent the development of these gaps in [literacy] skills can reduce the need for more costly and difficult interventions, including referrals to special education, later on in a child's life."

We enthusiastically share the Department's goal of college readiness in its draft priorities for both Race to the Top and the Investing in Innovation Fund. We know that strong reading competency is essential to preparing students for a successful college education. Our comments aim to sharpen and strengthen this shared objective.

The status of early learning as a "competitive priority" does not reflect the Department's recognition of the early years as critical nor the strong evidentiary base supporting them as a critical period of intervention accompanied by proven strategies and programs for doing so. We therefore recommend that the U.S. Department of Education designate the provision and expansion of PreKindergarten programs as part of the "PreK-3rd Learning Academies" under Absolute Priority 4: **Innovations that Turn Around Persistently Low-Performing Schools**. No other potential reform carries the certainty of improved achievement that high-quality PreKindergarten linked to intensive early literacy and language development provides. The Investing in Innovation Fund can address the issues of:

- improving the quality of PreKindergarten instruction;
- creating a coherent pathway from PreKindergarten through Third Grade;
- concentrating on expanded and improved language, literacy, and early math instruction from PreK to Grade 3.

While easily stated, these goals prove to be very challenging to achieve, so the Investing in Innovation Fund's recognition of the need to improve early instruction is a milestone in national education policy. The Department should clarify that such improvement includes PreK through Grade 3.

B. Effective Teachers and School Leaders Begin with PreKindergarten

We wholeheartedly agree that effective teachers and school leaders are essential to raising educational performance among low-income students, but

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this must include PreKindergarten teachers and support for building the capacity of principals and superintendents to provide leadership for integrating PreK programs into their schools and districts. Almost every state requires a teacher of five-year-old students to be a college graduate and certified. However, most states do not require the same of teachers of three and four-year olds. Some permit 16-year-old dropouts to serve as "assistant teachers." There is a mistaken belief among many including many principals and superintendents-that teaching high-need four-year-olds is simple and easy. It is not. The language, literacy, and general knowledge offered by a high-quality PreKindergarten requires college-educated teachers with the capacity to improve their practice through data analysis, along with focused professional development.

During the last decade, we have seen significant advances in instruments and tools to measure the effectiveness of classroom instruction and to help teachers improve their practice, particularly during the early years from PreK-Grade 3. One of the most promising of these is the CLASS (Classroom Assessment Scoring System), used widely in research in PreK classrooms, but developed for use through fifth grade. As one of the only nationally validated teacher observation instruments that is linked to both student outcomes and to teacher professional development needs, the CLASS is a promising intervention that would be especially valuable in the early elementary grades. Thus, improving the quality of PreK-3rd classrooms is both technically feasible and meaningful in terms of linking teachers with student outcomes during the early years.

We do not suggest that the U.S. Department of Education require the adoption of higher PreKindergarten teacher qualifications as a condition of application. However, the Department must clarify that applications for strategies and programs that include improving qualifications of PreKindergarten teachers are welcomed, even encouraged. We propose the following revision:

Statement of the Proposed Absolute Priority 1. Under Proposed Absolute Priority 1, the Department would provide funding to support practices, strategies or programs that increase the number or percentage of highly effective teachers, **including PreKindergarten teachers**, and school leaders or reduce the number or percentages of ineffective teachers and school leaders, especially for high-need students, by identifying, recruiting,

developing, placing, rewarding, and retaining highly effective teachers and school leaders (or removing ineffective teachers and school leaders." (p. 18)

C. PreKindergarten Data Offers Important Information About the Beginning Stages of Student Learning

Proposed Absolute Priority 2 on Innovations that improve the use of data should not overlook the rich trove of information contained within PreKindergarten enrollment, program, and performance data.

Over the past decade, the nation has witnessed a dramatic growth in the number of states supporting PreKindergarten education and in the number of children enrolled. Thirty-one of the 38 state programs target children of low-income families. While every state does not yet support PreKindergarten, current programs now serve too many future Kindergarteners to be left out of state and district data systems. The proposed Regulations do not reflect the importance of PreK learning experiences for student achievement. As with the priority for effective teaching, the requirements and incentives for inclusion of PreKindergarten data should be made explicit, and treated as of equal importance to K-12 data, since PreK enrollment, teacher, program, performance and other data can help K-12 teachers and schools, particularly at the elementary level. Finally, proposals for evaluations of approved Investing in Innovation projects should be encouraged to consider available PreKindergarten variables and data as relevant to assessing student outcomes. We propose the following revision:

"Statement of the Proposed Absolute Priority. Under proposed absolute priority 2, the Department would provide funding to support strategies, practices, or programs that facilitate the evaluation, analysis, and use of student achievement or student growth data...or LEA performance or productivity... or enable data aggregation, analysis, and research. **When available, applicants are encouraged to include enrollment, teacher, program, performance and other data from PreKindergarten programs serving or located in district schools.** Where applicable, these data would..." (p. 18)

D. Preparation for College Now Begins in PreKindergarten

Proposed Absolute Priority 3 that addresses improved standards and assessments leaves the impression that preparation for college can begin when students reach high school. The examples offered speak to increasing enrollment of low-income students in

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Advanced Placement and International Baccalaureate courses as well as STEM. While this goal might be achieved in a few small-scale, high school demonstration projects (with the exception of Montgomery County, Maryland, noted below), the Department ignores the more typical experience of low-income students who begin 9th grade reading at a 6th grade level. The expectation that high school teachers might routinely increase the literacy and mathematics skills of such students by two or more years in one year while introducing them to increasingly rigorous academic content at the same time is unrealistic without a plan to steadily reduce the numbers of students who reach high school burdened with belowgrade performance.

The Department should, instead, borrow from the experience of those school districts that have been most effective on a long-term basis at educating large numbers of low-income students. The evidence from districts such as Montgomery County, MD and Union City, NJ is that the goal of preparing every student to succeed in a four-year college or university begins with shaping curricular standards and expectations from PreKindergarten upward. Only by preparing students to be school ready at age five do districts and schools have the chance to produce strongly literate students by Grade Three. In turn, we know that students who are strong readers by Grade Three are much less likely to drop out or be incarcerated, and more likely to graduate from high school, attend college, and be productive citizens and workers.

The Investing in Innovation Fund priorities should be revised to encourage applicants to pursue the most effective strategies and programs starting with PreKindergarten. We propose the following:

"...Proposals may include practices, strategies, or programs that: (a) increase the **reading and mathematics literacy of primary grade students by emphasizing high-quality preschool and intensive early language, literacy, and math, and that promote** the success of under-represented student populations in academically rigorous courses and programs...; (b) increase the development and use of formative assessments or interim assessments, or other performance-based tools and metrics that are aligned with student content and academic achievement standards; or (c) translate the standards and information from assessments into classroom practices that meet the needs of all students, including high-need students, **beginning with PreKindergarten students at age three.**" (p. 18).

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E. Invest in Innovation that Will Ripple Upward, and Diminish the Need for Costly Interventions in Middle and High Schools

If LEAs do not provide the leadership and support for schools to focus on academic improvement, then only a few schools led by rare individuals whose heroic efforts cannot be duplicated widely will flourish. Where districts provide a culture of respectful collegiality and ambitious goals; curricular coherence; tailored assistance based on analyzing data of student performance; and, management support for budgeting, purchasing, and human resources, across-the-board improvement is possible. At the elementary school level, there are scores of districts that have demonstrated the ability to assist schools in achieving sustained, improved results that ripple upward through the education pipeline.

Surely, for persistently low-performing elementary schools, the opportunity presented by the "PreK-3rd" option - linking high-quality PreKindergarten to intensive early language and literacy instruction in the primary grades - should be specified:

(b) Targeted approaches to reform, including, but not limited to: (1) providing more time for students to learn core academic content by expanding the school day, school week, or the school year, or by increasing instructional time for core academic subjects during the day and in the summer; (2) **integrating and aligning high-quality PreKindergarten with intensive early language and literacy instruction in the primary grades; ...** (p. 18).

Thank you, Mr. Secretary, for the opportunity to respond to this rare and promising opportunity to improve the achievement of the vast majority of America's students.

Sincerely yours,

Ruby Takanishi, Foundation for Child Development
Libby Doggett, The Pew Center on the States, The Pew Charitable Trusts
Ira S. Hirschfield, The Evelyn and Walter Haas, Jr. Fund
Lee Sheehy, The McKnight Foundation
Ralph Smith, Annie E. Casey Foundation
Sandra Treacy, W. Clement and Jessie V. Stone Foundation