



To: Arne Duncan, United States Secretary of Education

From: Daniel Pedersen, President
Buffett Early Childhood Fund
dp@buffettearly.org / 402-541-4118

Gregory Taylor, Vice President, Programs
W.K. Kellogg Foundation
GBT@wkkf.org / 269-969-2343

Lois Salisbury, Director, Children, Families and Communities Program
David and Lucile Packard Foundation
lsalisbury@packard.org / 650-917-5220

Libby Doggett, Deputy Director, Pew Center on the States
The Pew Charitable Trusts
ldoggett@pewtrusts.org / 202-8629865

Re: Race to the Top Fund Comments
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On behalf of four of the nation's philanthropies which have made substantial, long-term commitments to achieving high-quality pre-kindergarten for the nation's children, we welcome the opportunity to offer comments on the draft guidance which the U.S. Department of Education has issued for competitive grants under the Race to the Top Fund. Since 2002, **The Pew Charitable Trusts** have invested over \$90 million and have worked in 35 states and the District of Columbia to promote policies that increase all children's access to voluntary, high-quality pre-kindergarten programs. In 2003, working collaboratively with The Trusts, **The David and Lucile Packard Foundation** made a similar commitment with a focus on California and federal policy. The Packard Foundation's funding toward expanding access to high-quality pre-kindergarten in California now exceeds \$45 million and builds on four decades of the Foundation's commitment to early education. Established in 2005, **The Buffett Early Childhood Fund** invests approximately \$20 million per year to improve the lives of infants, toddlers and preschool-aged children growing up in families which face the greatest odds. The Omaha-based foundation partners with other philanthropies to build Educare schools across

America, inform state and federal policy making, and broaden society's understanding of the science of early childhood. **The W.K. Kellogg Foundation**, established in 1930, supports children, families, and communities as they strengthen and create conditions that propel vulnerable children to achieve success as individuals and as contributors to the larger community and society. Grants are concentrated in the United States, Latin America, the Caribbean and southern Africa. In addition to strategic grant making, all four foundations have deep institutional knowledge on early education and have played roles as conveners, collaborators, leaders and catalysts for increased investments in this area of education reform.

President Obama and Secretary Duncan have already provided unprecedented leadership by placing early learning, starting at birth, on the nation's education reform agenda. The evidence base that undergirds their commitment and their policy leadership is well established. Therefore, the case for public investments in early learning as a key means of raising proficiency and closing the achievement gap will not be restated here.

In our opinion, the Race to the Top guidance misses a central opportunity to embed early learning into the Administration's education reform agenda. Decades of research suggest that without a strong early learning component, a state's and the nation's chances of success in closing the achievement gap and lifting student performance to internationally benchmarked standards are greatly diminished. Most research allocates at least one-third or more of the achievement gap to lost early learning opportunities. And, a high-quality early learning experience for the nation's most vulnerable children is a more effective and efficient means of preventing and closing the achievement gap before kindergarten than any subsequent education intervention. The Race to the Top guidance, as now structured, overlooks this evidence base. To address this shortcoming, this comment is structured around the Race to the Top's four pillars of reform and recommends specific ways that early learning can be more explicitly incorporated into each desired reform.

While this comment focuses on pre-k for the nation's 3- and 4- year-olds, our organizations embrace an early learning agenda that begins at birth and includes evidence-based home visiting and Early Head Start. For purposes of the Race to the Top Fund, however, with its focus on formal schooling, the missing link to early education is pre-kindergarten.

Given the power of the research and the scale of the Race to the Top's ambition to make a difference, The Buffett Early Childhood Fund, The W.K. Kellogg Foundation, The David and Lucile Packard Foundation, and The Pew Charitable Trusts urge, in addition to the specific modifications outlined below, the Department of Education to elevate the level of priority given to "P-20 Coordination and Vertical alignment" from an "invitational priority" to a "competitive priority." In doing so, the Race to the Top Fund will motivate states to design and implement their reforms starting with high-quality pre-kindergarten, assuring a much greater likelihood of success for America's children and schools.

Below, following the order of the proposed selection criteria, are specific suggestions for incorporating pre-k into the guidance.

1. Standards and Assessments: Voluntary, national standards should begin at pre-k, be grounded in child development principles, and be aligned with national assessments of kindergarten readiness and third grade performance.

Over 45 states have come together to focus on voluntary, national standards that are benchmarked to high international standards. These standards, thus far, have been defined as K-12. Many states, however, have already developed early learning standards for pre-k that articulate up through third grade. To begin voluntary national standards as late as kindergarten risks abrogating key principles of early childhood development and learning, which span the critical years between the ages of 3 and 8. If the standards only begin at age 5, children's developmental trajectory and the requisite skills and experiences that all children need before kindergarten to become proficient readers and learners by third grade will be ignored. We urge that the call for voluntary standards begin at pre-k and that the standards are grounded in child development principles. Not doing so risks, at a later time, a standards gap, varying across the nation's 50 states, between what's expected in pre-k and what's expected in kindergarten.

Like standards, assessments are critical to improved educational outcomes for children and improved state and national results. Given how differently individual children develop in the early years, the field is, quite rightly, concerned about driving individual assessment down into the younger years. Nonetheless, valid, reliable, and developmentally appropriate progress monitoring and assessments of children in the early years should be a critical piece of reform. In particular, the Race to the Top should call for the development of assessments aligned to national, voluntary standards for kindergarten readiness and for third grade reading and math. These measures are key predictors of long-term success. With such assessments and the data that can be used for improvement strategies and achieving quality, the Race to the Top will maximize its chances for long-term success.

Moreover, the Race to the Top now looks exclusively at improvements in high school graduation rates and preparedness for college and work as a state's measure of successful student outcomes. While these goals are the ultimate measure of reform, focusing only on the end product of high school graduation rates ignores the evidence that early childhood outcomes are correlated with later academic success. Assessments of kindergarten readiness and third grade reading and math scores, aggregated and used on a population basis, should also be built in as measures of a state's success from the beginning. Without these indicators, the Administration lessens its ability to take advantage of early learning and the success it can beget, provides little incentive for states to improve outcomes in the early years and ultimately risks failure on the initiative's long-term goals.

2. Data Systems to Support Instruction: Longitudinal data systems should begin at pre-k, be designed so that data eventually can be captured at birth, and feed into Quality Rating Improvement Systems for pre-k linked to K-3.

The Administration's underlying case for accountability and quality improvement, manifested by its requirement for K-12 longitudinal data systems, is equally applicable to early childhood. In the past five years, states have made tremendous progress in implementing policies to build K-12 longitudinal data systems that would give teachers, administrators and policy makers access to

information about how children are progressing and about the kinds of education programs that can best serve them. These data are central to determining what works and what needs to be changed. But, absent data on children in pre-k, states are hard-pressed to make informed policy decisions about improvements needed to assure that increasing numbers of children are ready to begin kindergarten. Early childhood data are needed to increase access, improve quality, identify critical social services and interventions and align standards, curricula and assessments from pre-k through third grade. Thus, the Race to the Top guidance needs explicitly to call for longitudinal data systems that begin at pre-k and are designed so that data can eventually be collected at birth to capture how children develop during the early years and what kinds of programs and services they encounter.

Additionally, when it comes to supporting K-3 instruction that would result in third grade proficiency in language arts and math, the principles of early childhood development and learning call for a Pre-k – 3 curricular framework that is aligned and articulated, starting with and building up from pre-k. As we look for innovation in education, this is one area that invites new models. Fortunately, a new approach in the early education field has emerged as a way to help drive alignment and articulation from pre-kindergarten through third grade. More than 15 states have adopted, and many more are developing, Quality Rating and Improvement Systems (QRIS) for their birth to five early learning centers. Some of these systems include state funded pre-k and some do not. However, these systems have the potential to bring together learning standards, data, continuous improvement, financial incentives and star rating systems to reward and motivate quality in early learning settings. With support and influence from the Race to the Top Fund, the QRIS systems could go further and link into K-3, providing a continuum of standards, data, incentives and accountability from Pre-k – 3. If states were encouraged through the Race to the Top to develop QRIS systems that link through third grade, QRIS could become the backbone of the instructional improvement system for the early years. This innovation might, in the long run, even hold break-through potential for improving K-12 education.

3. Great Teachers and Leaders: Create a Pre-k – 3 Teaching Credential and Career Pathways for Early Educators.

Improving teacher quality is also a central part of Race to the Top and here, too, the Department of Education misses a major opportunity to affect the outcome of this important reform initiative. In order to meet new, higher, national voluntary standards for Pre-k – 3, states should be encouraged to develop a Pre-k – 3 (or 5) teaching credential. The development of this credential would accelerate the design and alignment of a state's teacher training system to the new standards, assessments and instructional strategies for the early years. Since, in many states, much of the development of standards, assessments, curriculum and credentials at the pre-k and K-3 levels occurs in isolation, a Pre-k – 3 credential could drive more alignment. If, however, early childhood teacher credentialing or pre-k standards are delayed or conceived of separately, the risk is a patchwork approach not grounded in early learning principles and evidence based practices.

Additionally, a Pre-k – 3 teaching credential would address a number of issues which have plagued the early childhood field, leaving far too many children in low-quality early childhood settings that do not prepare them for kindergarten. The current early childhood teaching corps is

underpaid, insufficiently educated and trained, and suffers from high turnover. So, when dedicated early educators improve their training, the incentives to leave pre-k teaching and move into K-3 are powerful. Conversely, when the early education teaching corps is expected to meet high standards and is rewarded on a parity with K-12, as was the case in the New Jersey pre-k programs developed under the *Abbott* decision, the results for the teachers and the children are impressive, with benefits carrying forward into the early elementary years.

Currently, many states have inadequate and incoherent higher education pathways for their early educators. Now is the time to get it right, using the incentives of the Race to the Top Fund to catalyze the development of career pathways that lead to a Pre-k – 3 teaching credential.

4. Turning Around Struggling Schools: Implement early learning reform strategies in struggling schools and districts.

The Race to the Top calls for an intense focus on struggling schools, injecting strong accountability for rapidly improved student outcomes. At the elementary level, any effective strategy to improve outcomes for children in struggling schools cannot ignore the evidence base for early learning. If the early childhood components described above were brought to bear on a struggling elementary school or a district with a concentration of struggling elementary schools, the convergence of these strategies would greatly improve their chances of success. They include: expanded pre-k funding and programs, aligned Pre-k – 3 standards and assessments, longitudinal data systems, piloting QRIS that links pre-k and K-3 to improve instruction, and growing and deploying concentrated numbers of newly credentialed Pre-k – 3 teachers and leaders where they are needed most.

The benefits of a pre-k investment for elementary success are borne out by New Jersey's experience. In that state's lowest-income communities – the *Abbott* school districts – a focused effort to provide all children with high-quality pre-k has reduced elementary grade retention and improved second grade test scores.

Conclusion: Elevate early learning from an “invitational” to a “competitive” priority.

Finally, we conclude this comment with two points. First, without taking any position on the Early Learning Challenge Grant which is currently pending in Congress, we note that early on President Obama and Secretary Duncan identified the concept of an Early Learning Challenge Fund as central to the Administration's education reform agenda. There are several policy principles which we believe should be considered in assessing how well the Race to the Top Fund and, in concept, an Early Learning Challenge Fund align to maximize their benefit to America's young children:

- National, voluntary standards and assessments that begin with pre-k and are designed starting with the learning and developmental needs of 3 year olds;
- National benchmarks of success which include valid, reliable and developmentally appropriate assessments of kindergarten readiness and third grade reading and math that aggregate data on a population basis;

- A state QRIS system that links pre-k with K-3 to inform practice and continuous improvement for the early years;
- Longitudinal data systems that are designed to begin at birth;
- A commitment to high-quality instruction grounded in a Pre-k – 3 teaching credential.

In short, our schools need a strong bridge between the Race to the Top and an Early Learning Challenge Fund. These two reform initiatives cannot sit side by side, but must be articulated and integrated to achieve their intended effect.

Second, we close by reiterating that for the Race to the Top to succeed in helping America's schools achieve higher student outcomes and close the achievement gap, the Department of Education should elevate the level of priority for "P-20 Coordination and Vertical Alignment" from an "invitational priority" to a "competitive priority" (p. 37806 of the FR).

Please do not hesitate to call upon us for any further information or if there is any other way in which we can be helpful in this exciting and ambitious effort to improve the educational achievement of America's children.