



Joint Comments on Race to the Top – Early Learning Challenge, Draft Executive Summary

Submitted July 11, 2011 to U.S. Departments of Education & Health and Human Services

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>ELIGIBILITY REQUIREMENTS</p> <p>A State must meet the following requirements to be eligible to compete for funding under this program:</p> <p>(a) The Lead Agency must have executed with each Participating State Agency a Memorandum of Understanding (MOU), which the State must attach to its application, describing the Participating State Agency's level of participation in the grant. At a minimum, the MOU must include an assurance that the Participating State Agency agrees to implement policies and practices, consistent with the State Plan, including to the extent applicable--</p> <p>(i) Statewide Early Learning and Development Standards;</p> <p>(ii) Statewide Program Standards;</p> <p>(iii) The State's Tiered Quality Rating and Improvement System;</p> <p>(iv) Statewide Workforce Knowledge and Competencies and progression of credentials; and</p> <p>(v) Statewide Essential Data Elements that are captured in the State's data system.</p> <p>(b) The State must have an operational State Advisory Council on Early Childhood Education and Care that meets the requirements described in Section 642B(b) of the Head Start Act (42 U.S.C. 9837 b).</p>	<p>The Center for the Study of Social Policy and the National Alliance of Children's Trust and Prevention Funds thanks the Obama Administration for the opportunity to offer feedback on the proposed Executive Summary of the Race to the Top – Early Learning Challenge. This grant represents an unprecedented opportunity to support state efforts to close the achievement gap and promote positive outcomes for young children.</p> <p>We offer comments throughout this draft document in support of the following recommendations:</p> <p>Include as an Absolute Priority that States include as a primary goal: "Supporting parents in their primary role as their children's first teachers and engaging them as decision-makers and leaders."</p> <p>Require State Plans to include development and implementation of Family Leadership and Support Standards that clearly identify what professionals should know and be able to do, what programs should do, and what policies and systemic functions are necessary to ensure that the entire early care and education system supports parents in their role as their children's first teachers.</p> <p>Expand the Definition of High-Need Children, and require States to develop a specific plan for ensuring access to and continuity of</p>

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
	<p>high quality Early Learning and Development Programs for all children within the following categories: children of teen parents; children who have been exposed to domestic violence in the home; children who are or have ever been connected to the child welfare system and differential response system; children who are at risk of developmental delays or disabilities; and children whose parents suffer from depression, other mental health problems, or substance abuse</p> <p>We applaud the secretaries for their thoughtful and ambitious efforts to raise the bar on early learning and development opportunities for High-Need Children. Thank you again for the opportunity to offer our suggestions for strengthening the grant’s design to optimize its positive impact on young children and their families.</p> <p>Signed,</p> <p>Frank Farrow, Director, Center for the Study of Social Policy</p> <p>Judy Langford, Senior Fellow and Director, Strengthening Families Initiative, Center for the Study of Social Policy</p> <p>Teresa Rafael, Executive Director National Alliance of Children’s Trust and Prevention Funds</p>
<p>AWARD INFORMATION</p> <p>Budget Requirements: To support States in planning their budgets, the Department has developed budget caps for each State. These are listed below. The Department will not consider for funding an application from a State that proposes a budget that exceeds the applicable cap set for that State. The Department developed the following categories by ranking every State according to its share of the national population of children ages birth through five years old from low-income families, and identifying the natural breaks. Then,</p>	

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>based on population, we developed budget caps for each category.</p> <p>Category 1 – up to \$100M – California, Florida, New York, Texas Category 2 – up to \$70M –Arizona, Georgia, Illinois, Michigan, North Carolina, Ohio, Pennsylvania Category 3 –up to \$60M – Alabama, Colorado, Indiana, Kentucky, Louisiana, Missouri, New Jersey, Oklahoma, Puerto Rico, South Carolina, Tennessee, Virginia, Washington, Wisconsin Category 4 – up to \$50M – Alaska, Arkansas, Connecticut, Delaware, District of Columbia, Hawaii, Idaho, Iowa, Kansas, Maine, Maryland, Massachusetts, Minnesota, Mississippi, Montana, Nebraska, New Hampshire, New Mexico, Nevada, North Dakota, Oregon, Rhode Island, South Dakota, Utah, Vermont, West Virginia, Wyoming</p> <p>In addition to considering other relevant factors (see 34 CFR 75.217(d)(3)), the selection of grantees may consider the need to ensure that systems are developed in States with large, high poverty, rural communities (including States with high percentages of high-poverty populations in rural areas, as well as States with high absolute numbers of high-poverty individuals in rural areas), and awards may be granted to high-quality applications out of rank order to meet this need. The grant period for this award is December 31, 2011 through December 31, 2015.</p>	
<p>PRIORITIES</p> <p>Absolute priorities describe items that a State must address in its application in order to receive an award. States do not write directly to the absolute priorities; instead, reviewers determine if the priorities are met after evaluating a State’s response to all of the Selection Criteria. We consider for funding only applications that meet the absolute priorities.</p>	<p>We recommend emphasizing within the Absolute Priorities that States must include as a primary goal: “Supporting parents in their primary role as their children’s first teachers and engaging them as decision-makers and leaders.”</p> <p>We applaud the inclusion of “Engaging and supporting families” as a component of the grant criteria related to the State plan for “Promoting Early Learning and Development Outcomes for Children.” We support considering State applications based on their efforts or plans to provide information and support to families of High-Need Children to promote school readiness as described in the section (B)(5) of the Selection Criteria. In fact, we are aware of several States that are already doing this through their Strengthening Families initiatives.</p>

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
	<p>Additionally, we assert that the significant role of parents merits a strong emphasis on, and placement of, Family Leadership and Support as an essential component to a high quality early care and education system equal to Early Learning and Development Standards, Professional Standards, and Program Standards.</p> <p>To meet this priority, the Administration should require that a State’s application include a plan to develop and implement Family Leadership and Support Standards that clearly identify what professionals should know and be able to do, what programs should do, and what policies and systemic functions are necessary to ensure that the entire early care and education system supports parents in their role as their children’s first teachers.</p> <p>Like Early Learning and Development Standards, Family Leadership and Support Standards are inextricably linked to, and should be foundational to, quality and accountability systems for programs, professionals, and policymakers.</p> <p>We refer to our comments posted under section (B)(5) of the Selection Criteria for specific recommendations on the design and intent of Family Leadership and Support Standards.</p>
<p>Priority 1: Absolute Priority - Using Early Learning and Development Standards and Kindergarten Entry Assessments to Promote School Readiness</p> <p>To meet this priority, the State’s application must address the need to improve early learning and development outcomes for High-Need Children by (1) describing how the State is using its Early Learning and Development Standards to inform its Program Standards, curriculum, Comprehensive Assessment System, and professional development activities; and (2) having a credible plan to administer a kindergarten entry assessment, aligned with the Early Learning and Development standards, to all children who are entering a public school kindergarten by the start of the 2014-2015 school year, with the goals of informing efforts to close the school</p>	<p>Within Priority 1, we recommend including Family Leadership and Support Standards as an additional required lever to promote school readiness.</p> <p>For example, the language should be amended as follows: “To meet this priority, the State’s application must address the need to improve early learning and development outcomes for High-Need Children by (1) describing how the State is using its Early Learning and Development Standards “and its Family Leadership and Support Standards” to inform its Program Standards, curriculum, Comprehensive Assessment System, and professional development activities; and (2) having a credible plan to administer a kindergarten entry assessment aligned with the Early Learning and Development standards to all children who are entering a</p>

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>readiness gap at kindergarten entry and informing instruction and services in the early elementary school grades.</p>	<p>public school kindergarten by the start of the 2014-2015 school year, “and a school- and classroom-level Family Leadership and Support self-assessment,” with the goals of informing efforts to close the school readiness gap at kindergarten entry and informing instruction and services in the early elementary school grades.”</p> <p>We recognize that a school- and classroom-level Family Leadership and Support self-assessment tool does not currently exist, and that States might have to develop these based on their Family Leadership and Support Standards. We offer CSSP’s existing Strengthening Families Program Self-Assessment as a starting point for this work, and indeed, several States are already using it to do so. Also, there are many successful models in Early Learning and Development Programs that can inform K – 3 Family Leadership and Support Standards. As this is an emerging area, the costs associated with this might fall outside the bounds of the Race to the Top funding. However, we wish to emphasize that schools should recognize their own responsibility for supporting and engaging parents, and be informed about what teachers and administrators should know and be able to do to meet this responsibility.</p>
<p>Priority 2: Absolute Priority - Using Tiered Quality Rating and Improvement Systems to Promote School Readiness</p> <p>To meet this priority, the State’s application must demonstrate that it is implementing and validating or will implement and validate a Tiered Quality Rating and Improvement System with the purpose of (1) increasing the number of High-Need Children in high-quality Early Learning and Development Programs, (2) increasing participation in the Tiered Quality Rating and Improvement System across Early Learning and Development Programs (including programs with full-day, full-year care) particularly publicly funded programs, (3) supporting programs in improving the quality of Early Learning and Development Programs, and (4) communicating program ratings to parents and the public.</p>	<p>We support establishing Tiered Quality Rating and Improvement Systems as an Absolute Priority. As several States that are implementing the Strengthening Families approach demonstrate, a QRIS is an effective mechanism to support implementation of Family Leadership and Support Standards in programs. More than a dozen States are incorporating the Strengthening Families Protective Factors into their QRIS quality indicators. Doing so opens opportunities to also tie-in training and professional development requirements related to Family Leadership and Support. It also offers an entry point for Family, Friend and Neighbor care, as we discuss under Priority 3 below.</p> <p>In many cases, States are involving parents directly in the design, review, and implementation of the QRIS. Strengthening Families States have many examples and strategies to offer as models for how to this can be done effectively.</p>

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>A competitive preference priority describes an area of particular interest for which an applicant may earn additional points. States may respond to the competitive preference priority throughout their application, as appropriate, as well as through a summary of the State’s approach to addressing the priority. This priority is evaluated in the context of the State’s entire application.</p>	
<p>Priority 3: Competitive Preference Priority – Including all Early Learning and Development Programs in the Tiered Quality Rating and Improvement System</p> <p>To receive competitive preference under this priority, the State’s Plan must be designed to increase the number of children from birth to kindergarten entry who are participating in programs that are governed by the State’s licensing system and quality standards, with the goal that all licensed or State-regulated programs will participate. The State must demonstrate in its application that-- (a) It has a licensing and inspection system that covers all programs that are not otherwise regulated by the State and that regularly care for two or more unrelated children for a fee in a provider setting, or that it has a High-Quality Plan to implement such a system by June 30, 2013; and (b) All licensed or State-regulated Early Learning and Development Programs participate in the State’s Tiered Quality Rating and Improvement System, or that it has a High-Quality Plan to implement such a system by June 30, 2013.</p>	<p>We recommend changing the criteria language to reflect the importance of children’s successful transition into kindergarten and to encourage strong relationships and coordination between Early Learning and Development Programs and public schools. For example, we recommend replacing “from birth to kindergarten entry” with “from birth through transition to kindergarten,” as follows:</p> <p>“To receive competitive preference under this priority, the State Plan must be designed to increase the number of children from birth “through transition to kindergarten” who are governed by the State’s licensing system . . . “</p> <p>We also urge the secretaries to consider that Family, Friend and Neighbor Care (FFN, also referred to as informal or unlicensed care), serves a vast majority of High-Need Children under age 5. FFN care is also often the most common, if not the only, form of care in rural communities. Thus, FFN providers represent a critical opportunity for promoting positive child outcomes.</p> <p>Research shows that FFN providers often have similar needs and characteristics of the parents of the children in their care. As we have learned from several States, the Strengthening Families Protective Factors are useful for framing and informing strategies to support FFN providers. Like parents, FFN providers benefit from efforts to</p> <ul style="list-style-type: none"> • Increase provider resilience to encourage positive, trusting and caring relationships with children and their parents. • Facilitate social connections within their communities and with other FFN providers. • Ensure access to concrete supports in times of need.

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
	<ul style="list-style-type: none">• Deepen their knowledge of parenting and child development• Support them in promoting the social and emotional competency of their children. <p>QRIS criteria for FFN providers must also be accompanied by opportunities and resources to encourage their involvement and meet their needs. Most critical for this population, these opportunities must be linguistically and culturally appropriate for the diverse populations of informal care providers.</p> <p>State Strengthening Families efforts offer examples of creative approaches to supporting FFN care providers, for example, through community cafes, free training and workshops, and stipends and support for them to participate.</p> <p>Another effective strategy is to link or integrate support into community activities available for young children, such as Play & Learn groups, which started in Hawaii and have now spread to communities in several other States. These are facilitated play groups for young children and their caregivers and/or parents, run by community organizations in a variety of locations including libraries, community centers, family support centers, etc.</p> <p>A 2007 evaluation of Play & Learn groups in Seattle/King County, Washington found this strategy to be the most successful approach to supporting FFN caregivers. Among participating FFN caregivers and parents, 72 percent reported increasing knowledge about their role in helping children be ready for school and 77 percent reported changing what they do with the children in their care “a lot more”. Most strikingly, among FFN providers and parents who answered the survey in a language other than English, 87 percent reported knowing a lot more about helping kids prepare for school and understanding how children learn through play, with 92 percent saying they have changed their behavior because of what they’ve learned at Play & Learn.</p> <p>(Source: Organizational Research Services, <i>Family, Friend and Neighbor Caregiver Project, 2007 Report</i> (prepared for Child Care</p>

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
	Resources), January 2008. Retrieved from http://childcare.org/ffn-care/FFN-final-report-013108.pdf)
<p>Invitational priorities signal areas the Department is particularly interested in; applicants may choose to address one or both invitational priorities. Applicants who meet an invitational priority do not earn extra points and are not given preference over other applications.</p>	
<p>Priority 4: Invitational Priority – Sustaining Program Effects in the Early Elementary Grades</p> <p>The Secretary of Education and the Secretary of Health and Human Services are particularly interested in applications that describe the State’s plans to sustain and build upon improved early learning outcomes throughout the early elementary school years, including by--</p> <ul style="list-style-type: none"> (a) Enhancing the State’s current kindergarten through grade 3 standards in order to align them with the Early Learning and Development Standards across all Essential Domains of School Readiness; (b) Ensuring transition planning between Early Learning and Development Programs and elementary schools, and promoting family engagement, including in the early grades; and (c) Increasing the percentage of children who are able to read and do mathematics at grade level by the end of the third grade. 	<p>We support the secretaries’ invitation to States to include sustaining program effects in the early elementary grades as a priority. We offer the Strengthening Families approach as a powerful tool to support positive transitions and sustain the gains and strong parent-teacher relationships from high quality Early Learning and Development Programs.</p> <p>School entry marks the start of a significant new influence on a child’s development and a subtle shift in leadership from family to school in the child’s education and socialization. This change can be a challenge for children, their families, and schools alike. There is a growing understanding that a high degree of continuity between a child’s early environment (including the home and other care settings) and the new school environment creates the best opportunity for a child’s success in school. For teachers, principals and administrators, and policymakers, understanding the family point of view is critical to designing and implementing effective transition strategies.</p> <p>Emerging evidence associates the Strengthening Families approach with improvements in the skills, relationships and confidence parents need to be effective advocates for their children during and after their children’s transition to kindergarten. (Rost, et al., 2011)</p>

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
	<p>Among the five Protective Factors that are the foundation of the CSSP’s Strengthening Families approach, research suggests that the three most particularly related to school transition are the family’s social connections, the family’s knowledge of parenting and child development (Weiss et al., 2006), and the child’s social and emotional competence (Pawl et al., 2000). Researchers have identified four processes that promote family involvement and smooth transitions to school (Krieder, 2002). These include: information and guidance, leadership and learning opportunities, strong patterns of involvement and trusting relationships. These processes are mirrored in many of the Strengthening Families low-cost program strategies, including those that:</p> <ul style="list-style-type: none">• Facilitate friendships and mutual support• Strengthen parenting• Link families to services and opportunities• Facilitate children’s social and emotional development• Value and support parents <p>The Strengthening Families approach is based on changing the attitudes and perceptions of both parents and teachers and creating new ways of linking families to other resources they can use to help their children. The emphasis is on small but significant changes in daily practices that are often low- or no-cost to programs or schools. It therefore can be incorporated and used effectively by any school district without a large expenditure of funds.</p> <p>States and programs that are implementing the Strengthening Families approach at the program and system level offer examples and lessons to offer in this important policy area. Several tools already exist that can be easily adapted to the school environment to support successful implementation. These include the Strengthening Families Program Self-Assessment (described in comments elsewhere), which could be adapted for schools and classrooms; the Protective Factor Survey developed by the FRIENDS National Resource Center for Community-Based Child</p>

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
	<p>Abuse Prevention, a valid and reliable assessment tool for understanding where parents are and later where they are growing in relation to the Protective Factors; and the use of the Community Café technology to create conversations between and among parents, teachers, and school administrators that build on the Protective Factors, engage parents, and create positive relationships between school and parents. (Community Cafés are a series of guided conversations based on the Strengthening Families Protective Factors Framework. For more information, visit http://www.ctfalliance.org/initiative_parents-2.htm.)</p> <p>Source citations: Kreider, H., 2002. Getting Parents “Ready” for Kindergarten: The Role of Early Childhood Education,” Family Involvement Network of Educators (FINE), Harvard Family Research Project.</p> <p>Rost, K. et al., <i>Strengthening Families and Parental Resiliency: Impact on School Readiness</i> (National Alliance of Children’s Trust and Prevention Funds, 2011). Available at http://www.ctfalliance.org/images/pdfs/OH_ParentalResilience.pdf</p> <p>Weiss, H., Caspe, M., & Lopez, M.E. (2006, Spring). <i>Family involvement makes a difference: Evidence that family involvement promotes school success for every child of every age</i>. Boston: Harvard Family Research Project.</p>
<p>Priority 5: Invitational Priority – Encouraging Private Sector Support</p> <p>The Secretary of Education and the Secretary of Health and Human Services are particularly interested in applications that describe how the private sector will provide financial and other resources to support the State and its Participating State Agencies or Participating Programs in the implementation of the State Plan.</p>	
<p>SELECTION CRITERIA</p>	

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>Selection criteria are the focal point of the application and peer review. States address the selection criteria in their application narrative and a panel of peer reviewers will evaluate the applications based on the extent to which the selection criteria are addressed</p>	
<p>A. Successful State Systems</p> <p>(A)(1) The State’s ambitious early learning and development reform agenda and goals. The extent to which the State clearly articulates an ambitious yet achievable early learning and development reform agenda and goals for improving program quality and child outcomes Statewide, and for closing the achievement gap for High-Need Children; establishes a clear and credible path to achieving these goals (by presenting evidence on its past performance and commitment); and the extent to which the State’s early learning reform agenda and goals are consistent with the State Plan.</p> <p>Performance Measures: States must establish baseline numbers, annual targets, and final goals for the following:</p> <ul style="list-style-type: none"> • Increasing the number and percentage of High-Need Children participating in high quality Early Learning and Development Programs (disaggregated by race, gender, disability status, and English learner status, and by each age group of infants, toddlers, and preschoolers); and • Improving performance of High-Need Children on the State’s kindergarten entry measure (disaggregated by race, gender, disability status, and English learner status). 	<p>Research shows that adverse early experiences (such as those experienced through maltreatment) negatively impact brain development and contribute to poor educational, socio economic, and health outcomes for individuals over the life course (Center on the Developing Child at Harvard University, 2010).</p> <ul style="list-style-type: none"> • One-third of all child abuse victims are younger than four years, and children under one year had the highest overall victimization rate at almost 13 percent. Victimization of children under age one is also the most lethal. • Eleven percent of child abuse victims were reported as having a disability • Eighteen percent of child abuse victims were exposed to domestic violence in the home. <p>(U.S. Department of Health and Human Services, Administration for Children and Families, Administration on Children, Youth and Families, Children’s Bureau. (2010). Child Maltreatment 2009. Available from http://www.acf.hhs.gov/programs/cb/stats_research/index.htm#can)</p> <p>Any effort to dramatically improve educational outcomes for High-Need children, such as the Race to the Top Early Learning Challenge opportunity, should require States to include a detailed plan for meeting the early care and education needs of the most vulnerable infants, toddlers and preschoolers, namely those who are involved in the child welfare system or differential response system, and those identified or at-risk of disabilities and developmental delays.</p> <p>To this end, the Administration should require that State child welfare agencies, Medicaid and/or State Children’s Health Insurance agencies, and Community Based Child Abuse Prevention Fund lead agency be included as required Participating State Agencies to help develop this plan. In addition, the</p>

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
	<p>Administration can promote coordination of this plan with existing federal opportunities such as the recently announced “Early Education Partnerships to Expand Protective Factors for Children with Child Welfare Involvement” discretionary grant from the Administration for Children, Youth and Families (HHS-2011-ACF-ACYF-CO-0185).</p> <p>Source citation: Center on the Developing Child at Harvard University (2010). <i>The Foundations of Lifelong Health Are Built in Early Childhood</i>. http://www.developingchild.harvard.edu</p>
<p>(A)(2) Demonstrating past commitment and investment in supporting Early Learning and Development Programs.</p> <p>The extent to which the State has demonstrated from January 2007 to the present--</p> <ul style="list-style-type: none"> (a) Its commitment to early learning and development, as evidenced by the State’s existing policies and practices; (b) Its commitment to investing resources in Early Learning and Development Programs, including the amount of these investments in relation to the size of the State’s population of High-Need Children; (c) Increased access to high-quality Early Learning and Development Program for High Need Children in the State. 	
<p>(A)(3) Organizing and aligning the early learning and development system to achieve success.</p> <p>The extent to which the State has established, or has a High-Quality Plan to establish, strong participation and a governance structure that will facilitate interagency system-wide coordination or integration to support and enable streamlined decision-making, allocation of resources, and sustainability by--</p> <ul style="list-style-type: none"> (a) Demonstrating how the Participating State Agencies and other partners, if any, will work together and govern themselves both during and after the period of the grant, including: 	<p>CSSP and the Alliance recommend that States be required to include parent representatives in a formal advisory or decision-making capacity within the Early Learning and Development System’s governance structure at the State level. This can take the form of a formal Parent Advisory Committee, inclusion of parents on a broader stakeholder advisory committee, inclusion of parents as members of the State Advisory Council, etc. States may be encouraged to provide multiple opportunities to ensure a diversity of parent voices.</p> <p>We applaud the inclusion of “family and community organizations (e.g., parent councils, nonprofit organizations, local foundations,</p>

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>(i) The organizational structure for managing the grant;</p> <p>(ii) The roles and responsibilities of the State Lead Agency, the State Advisory Council, each Participating State Agency, the State’s Interagency Coordinating Council for Part C of the Individuals with Disabilities Education Act (20 U.S.C. 1441 et seq.), and other partners, if any;</p> <p>(iii) The method and process for making different types of decisions (e.g., policy, operational) and resolving disputes; and</p> <p>(iv) The plan for when and how to involve representatives from Participating Programs, Early Childhood Educators or their representatives, families, and other key stakeholders</p> <p>(b) Demonstrating that the Participating State Agencies are strongly committed to the State Plan, to the governance structure, and to effective implementation of the State Plan, by including in the Memoranda of Understanding or other binding agreements--</p> <p>(i) Terms and conditions that reflect a strong commitment to the State Plan by each Participating State Agency, including by aligning and leveraging the Participating State Agency’s existing funding to support the State Plan;</p> <p>(ii) “Scope-of-work” descriptions that require the Participating State Agency to implement all applicable portions of the State Plan, including a description of efforts to maximize the number of Early Learning and Development Programs that become Participating Programs, (especially those that are in the Tiered Quality Rating and Improvement System); and</p> <p>(iii) A signature from an authorized representative of the Participating State Agency;</p> <p>and</p> <p>(c) Demonstrating understanding of and commitment to the State Plan, from a broad group of stakeholders and local communities, that translate into broad Statewide impact and will enable the State to reach its ambitious yet achievable goals as outlined in Selection Criterion</p> <p>(A)(1), including--</p> <p>(i) Strong letters of intent or actions of support from Early Learning Intermediary Organizations and, local early learning councils, if applicable; and</p> <p>(ii) Letters or actions of support from such other stakeholders as</p>	<p>tribal organizations, and community based organizations)” among stakeholders from whom letters of support are required.</p>

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>Early Childhood Educators or their representatives, the State’s legislators; local community leaders; State and local union affiliates; faith-based organizations; other State and local leaders (e.g., business, community, tribal, civil rights, and education association leaders); family and community organizations (e.g., parent councils, nonprofit organizations, local foundations, tribal organizations, and community based organizations); and postsecondary institutions.</p>	
<p>(A)(4) Building or enhancing an early learning data system to improve instruction, practices, services, and policies.</p> <p>The extent to which the State has in place, or has a High-Quality Plan to build, an extension to the State’s existing Statewide Longitudinal Data System or a separate, but coordinated, early learning data system that aligns and is interoperable with the Statewide Longitudinal Data System, and that such system --</p> <ul style="list-style-type: none"> (a) Enables uniform data collection and easy entry of the Essential Data Elements by Participating State Agencies and Participating Programs; (b) Facilitates the exchange of data among Participating State Agencies by using standard data structures, data formats, and data definitions such as Common Education Data Standards to ensure interoperability among the various levels and types of data; (c) Generates information that is timely, relevant, accessible, and easy for Early Learning and Development Programs and Early Childhood Educators to use for continuous improvement and decision-making; (d) Is supported by high-quality professional development for Early Childhood Educators on the access and use of data; and (e) Meets the Data System Oversight Requirements and complies with the requirements of Federal, State and local privacy laws. 	
<p>(A)(5) Developing a budget to implement and sustain the work of this grant.</p> <p>The extent to which the budget included in the State Plan--</p> <ul style="list-style-type: none"> (a) Demonstrates how resources will be repurposed or reallocated, from other Federal, State, private, and local sources (e.g., CCDF, Title I, IDEA, State preschool, Head Start Collaboration and State 	

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>Advisory Council funding, Home Visiting, Title V MCH, TANF, Medicaid, Child Welfare, Statewide Longitudinal Data System, and foundation and other private funding sources) to align those resources with, and support and sustain, the State Plan, including-</p> <p>(i) How funds from this grant will be supplemented by repurposing or reallocating funds from other existing early learning and education sources, including how the quality set-asides in CCDF will be used to support and sustain activities described in the State Plan;</p> <p>(ii) How funding levels will be sustained after the period of the grant is over to ensure that the number and percentage of High Need Children served by Early Learning and Development Programs will be sustained or expanded.</p> <p>(b) Describes, in both the budget narratives and budget tables, how the State will effectively and efficiently use funding from this grant to achieve the outcomes in the State Plan, in a manner that--</p> <p>(i) Is adequate to support the activities described in the State Plan;</p> <p>(ii) Includes costs that are reasonable and necessary in relation to the objectives, design, and significance of the activities described in the State Plan and the number of children to be served; and</p> <p>(iii) Details the amount of funds budgeted for Participating State Agencies, localities, Participating Programs, or other partners, and the specific activities to be implemented with these funds consistent with the State Plan, including a significant amount of funding going to the local implementation of the State Plan.</p>	
<p>B. Promoting Early Learning and Development Outcomes for Children</p>	
<p>(B)(1) Developing and using Statewide, high-quality Early Learning and Development Standards.</p> <p>The extent to which the State has in place, or has a High-Quality Plan to put in place in a timely fashion, high-quality Early Learning and Development Standards that are used in common by Early Learning and Development Programs and that--</p>	<p>CSSP and the Alliance recommend adding an additional criterion for States to demonstrate the extent to which they are developing and using Family Leadership and Support Standards, as follows: “The extent to which the State has in place, or has a High-Quality Plan to put in place in a timely fashion, high-quality Family Leadership and Support Standards that are used in common by</p>

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>(a) Include evidence that the Early Learning and Development Standards are developmentally, linguistically, and culturally appropriate across each age group of infants, toddlers, and preschoolers, and cover the Essential Domains of School Readiness; and</p> <p>(b) Include evidence that the Early Learning and Development Standards are aligned with the State’s K-3 academic standards in, at a minimum, early literacy and mathematics.</p> <p>(c) Are incorporated in high-quality Program Standards, curricula, Comprehensive Assessment Systems, Workforce Knowledge and Competencies, and professional development activities.</p> <p>(d) Include evidence that the State has supports in place to promote understanding and commitment to the Early Learning and Development Standards across Early Learning and Development Programs</p>	<p>Early Learning and Development Programs and that--</p> <p>(a) Include evidence that the Family Leadership and Support Standards are developmentally, linguistically, and culturally appropriate for all families; and</p> <p>(b) Include evidence that the Family Leadership and Support Standards align to or will be used to inform development of the State’s K-3 Family Leadership and Support Standards.</p> <p>(c) Are incorporated in high-quality Program Standards, curricula, Comprehensive Assessment Systems, Workforce Knowledge and Competencies, and professional development activities.</p> <p>(d) Include evidence that the State has supports in place to promote understanding and commitment to the Family Leadership and Support Standards across Early Learning and Development Programs”</p> <p>As we recommend elsewhere, States should be required to develop K-3 Family Leadership and Support Standards that align with those established for the Early Learning and Development system.</p>
<p>(B)(2) Supporting effective uses of Comprehensive Assessment Systems.</p> <p>The extent to which the State and the Participating State Agencies are supporting, or have a High-Quality Plan to support, the effective implementation of developmentally appropriate Comprehensive Assessment Systems by--</p> <p>(a) Working with Early Learning and Development Programs to strengthen Early Childhood Educators’ understanding of the purposes and uses of each type of assessment within the Comprehensive Assessment System and their ability to select instruments that are appropriate for the target populations and purposes;</p> <p>(b) Articulating an approach for aligning and integrating assessments and sharing assessment results, as appropriate, in order to avoid duplication of assessment and coordinate services for High-Need Children served by multiple Early Learning and Development Programs;</p> <p>and</p>	

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>(c) Training Early Childhood Educators to appropriately administer assessments and interpret and use assessment data in order to guide and improve instruction, programs and services.</p>	
<p>(B)(3) Understanding the status of children’s learning and development at kindergarten entry. The extent to which the State is administering, or has a High-Quality Plan to administer, a common, Statewide kindergarten entry assessment that is aligned with the State’s Early Learning and Development Standards, that informs instruction and services in the early elementary grades, and that—</p> <ul style="list-style-type: none"> (a) Covers all of the Essential Domains of School Readiness; (b) Is valid, reliable, and appropriate for the target population and for the purpose for which it will be used; (c) Is administered to all children who are entering a public school kindergarten Statewide; (d) Is appropriate for all children, including English learners and children with disabilities; (e) Is reported to the Statewide Longitudinal Data System, and to the early learning data system if it is separate from the Statewide Longitudinal Data System, as permitted under and consistent with the requirements of Federal State, and local, privacy laws; and (f) Will be administered Statewide no later than the start of school year 2014-2015. 	
<p>(B)(4) Identifying and addressing the health, behavioral, and developmental needs of High-Need Children to improve school readiness. The extent to which the State is identifying and addressing, or has a High-Quality Plan to identify and address, the health, behavioral, and developmental needs of High-Need Children by-</p> <ul style="list-style-type: none"> (a) Establishing a progression of standards for ensuring children’s health and safety, ensuring that health and behavioral screening and follow up are done, and promoting children’s physical, social, and emotional development across the levels of its Program Standards; (b) Meeting ambitious yet achievable annual targets to increase the number of Early Childhood Educators who are trained and 	<p>We urge the Administration to require States to develop a specific plan for ensuring access to and continuity of high quality Early Learning and Development Programs for all children within the following categories:</p> <p>Children of teen parents; children who have been exposed to domestic violence in the home; children who are or have ever been connected to the child welfare system and differential response system; children who are at risk of developmental delays or disabilities; and children whose parents suffer from depression, other mental health problems, or substance abuse.</p>

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>supported in meeting, the health standards;</p> <p>(c) Leveraging existing resources to meet ambitious yet achievable annual Statewide targets to-- (i) Screen all High-Need Children using screening measures that align with the Medicaid Early Periodic Screening, Diagnostic and Treatment benefit (Section 1905(r)(5) of the Social Security Act) or the well-baby and well-child services available through the Children’s Health Insurance Program (42 CFR 457.520), and consistent with “Child Find” (Sections 612(a)(3) and 635(a)(5) of the Individuals with Disabilities Education Act (20 U.S.C. 1400)), as appropriate;</p> <p>(ii) Refer children for services based on the results of those screenings, and confirm that follow-up occurred, where appropriate;</p> <p>(iii) Promote participation in ongoing health care as part of a schedule of well child care; and</p> <p>(iv) Promote healthy eating habits and expanded physical activity and improved nutrition.</p>	<p>The plan should require Memoranda of Understanding to be adopted among local and State agencies that serve children in the above categories specifying roles and responsibilities for carrying out the plan. The plan itself should:</p> <ul style="list-style-type: none"> • Specify and ensure delivery of training on child development, the State’s Family Leadership and Support Standards, and the systemic elements (such as information, referral sources) available to assist in accessing high quality Early Learning and Development Programs. This training should be required for State and local program administrators and staff of all programs that serve children in the situations listed above. • Establish training and performance requirements for contracted foster care and differential response providers, and training for foster parents that incorporate the State’s Early Learning and Development Guidelines and the Family Leadership and Support Standards. • Require active planning across agencies to ensure seamless policies and procedures • Include policies and procedures to ensure continuity of care for children who have experienced trauma or who are developmentally delayed, etc. These should include, for example, requiring that children remain in their Early Learning and Development program regardless of their status as foster children, and requiring that the placement be as close as possible to both the foster parents and biological parents so that the child can remain in the same program regardless of family status.
<p>(B)(5) Engaging and supporting families. The extent to which the State provides, or has a High-Quality Plan to provide, information and support to families of High-Need Children to promote school readiness for their children, by--</p> <p>(a) Establishing a progression of standards for family engagement across the levels of its Program Standards including activities that enhance the capacity of families to support their children’s education and development;</p>	<p>As we stated in our comments under the Priorities section, we support considering State applications based on their efforts or plans to provide information and support to families of High-Need Children to promote school readiness, as described in the section (B)(5) of the Selection Criteria. We assert that the significant role of parents merits a strong emphasis on, and placement of, Family Leadership and Support Standards as an essential component to a high quality early care and education system equal to Early</p>

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>(b) Meeting ambitious yet achievable annual targets to increase the number and percentage of Early Childhood Educators trained on the family engagement strategies included in the Program Standards; and</p> <p>(c) Leveraging existing resources to promote family support and engagement Statewide, including through home visiting programs and other family-serving agencies.</p>	<p>Childhood Development and Learning Standards, Professional Standards, and Program Standards.</p> <p>State applications should be required to include a plan to develop and implement Family Leadership and Support Standards that clearly identify what professionals should know and be able to do, what programs should do, and what policies and system functions are necessary to ensure that the entire early care and education system supports parents in their role as their children’s first teachers.</p> <p>Based on our knowledge of State efforts and concrete examples from exemplary early care and education programs, we offer the Strengthening Families approach and Protective Factors framework as a platform for informing Family Leadership and Support Standards.</p> <p>Five Protective Factors are the foundation of the Strengthening Families Approach:</p> <ul style="list-style-type: none">• Parental resilience• Social connections• Concrete support in times of need• Knowledge of parenting and child development• Social and emotional competence of children <p>Research supports the common-sense notion that these Protective Factors reduce the likelihood of child abuse and neglect and promote optimal child development. State Family Leadership and Support Standards should define program practice, professional competencies, and accountability measures that ultimately support parents as decision makers and leaders and ensure that the Protective Factors are robust in families’ lives and communities. They should also be linguistically and culturally appropriate to all families</p> <p>CSSP conducted field research to identify exemplary programs and study the practices they employ to build Protective Factors in</p>

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
	<p>families. Our analysis identified a wide range of small but significant changes in everyday practice that make a difference for families, many at little or no additional cost to programs. We found that exemplary programs engaged in strategies to:</p> <ol style="list-style-type: none"> 1. Facilitate friendships and mutual support 2. Strengthen parenting 3. Respond to family crises 4. Link families to services and opportunities 5. Facilitate children’s social and emotional development 6. Observe and respond to early warning signs of child abuse or neglect 7. Value and support parents <p>Several States have found the Strengthening Families approach and Protective Factors framework useful to establishing a progression of standards for family leadership and support across the levels of its Program Standards and Quality Ratings, providing professional training on strategies based on the Protective Factors framework, leveraging existing resources (such as Community-Based Child Abuse Prevention (CBCAP) funding), and building relationships with existing organizations and support infrastructure (such as Children’s Trust and Prevention Funds, Child Care Resource and Referral agencies, institutions of higher education, etc.) to promote these efforts Statewide.</p> <p>At the program level, many States are encouraging the use of the Strengthening Families Program Self-Assessment, a valid and reliable tool developed by CSSP to measure the extent to which a program is employing the seven strategies mentioned above. The on-line version of the Self-Assessment enables compilation of responses from staff, parents and administrators at the program level, allows for comparison of responses over time, and informs develop an action plan for continuous improvement. Data can be aggregated across programs and at the State level to provide snapshot information, monitor trends, and inform policy.</p>

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>C. High-Quality, Accountable Programs</p>	
<p>(C)(1) Developing and adopting a common, Statewide set of tiered Program Standards. The extent to which the State and the Participating State Agencies have developed and adopted, or have a High-Quality Plan to develop and adopt, a Tiered Quality Rating and Improvement System based on a common set of tiered Program Standards that-- (a) Are clear and measurable, meaningfully differentiate program quality levels, and demonstrate high expectations of program excellence commensurate with nationally recognized standards that lead to improved learning outcomes for children; and (b) Are linked to the State licensing system</p>	<p>We recommend that States be required to solicit meaningful parent input on the Program Standards through, for example, community cafés, parent surveys, focus groups, and/or participation of parents in the design, review and adoption of the standards. The Program Standards should align with and link to the Family Leadership and Support Standards that we recommend be required as part of a successful State Plan.</p>
<p>(C)(2) Promoting Participation in the State’s Tiered Quality Rating and Improvement System. The extent to which the State has maximized, or has a High-Quality Plan to maximize, participation in the Tiered Quality Rating and Improvement System by – (a) Implementing effective policies and practices to reach the goal of all publicly funded Early Learning and Development Programs participating in such a system, including programs in each of the following categories-- (i) State-funded Early Learning and Development Programs; (ii) Early Head Start and Head Start programs; (iii) Early Learning and Development Programs funded by the Individuals with Disabilities Education Act Part C, and Part B Section 619; (iv) Early Learning and Development Programs funded under Title I of the Elementary and Secondary Education Act; and (v) Early Learning and Development Programs receiving funds from the State’s CCDF program; (b) Implementing effective policies and practices toward the goal of increasing the number and share of High-Need Children in Early Learning and Development Programs that are a part of such a system; (c) Setting ambitious yet achievable numbers and percentages of Early Learning and Development Programs and that participate in</p>	<p>We recommend requiring States to seek input from working families with High-Need Children about the kinds of assistance they need to access high quality Early Learning and Development Programs. This can be done at the program and State level, for example, by conducting parent surveys or hosting parent dialogues, requiring parent representatives on program’s board of directors, State governance bodies, etc.</p>

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>the Tiered Quality Rating and Improvement System by type of Early Learning and Development Program (as listed in (C)(2)(a) (i) through (v) above); and (d) Providing supports to help working families with High-Need Children access high quality Early Learning and Development Programs that meet their needs (e.g., providing full-day, full-year programs, transportation, meals, and family support services).</p>	
<p>(C)(3) Rating, monitoring, and improving Early Learning and Development Programs. The extent to which the State and the Participating State Agencies have developed and implemented, or have a High-Quality Plan to develop and implement, a system for rating, monitoring, and improving the quality of Early Learning and Development Programs participating in the Tiered Quality Rating and Improvement System by– (a) Using a valid and reliable tool for monitoring, trained monitors whose results have a sufficient level of inter-rater reliability, and an appropriate frequency of monitoring and rating; (b) Making program quality information and licensing history easily available to families selecting care, to families whose children are enrolled in programs, and to the public (including by posting any health and safety violations on a public website), in ways that are easy to understand, interpret, and use for decision-making; and (c) Developing and implementing practices and policies that support and provide incentives for Early Learning and Development Programs to continuously improve (e.g., through training, technical assistance, financial rewards or incentives, higher subsidy reimbursement rates, compensation); (d) Setting ambitious yet achievable targets for increasing the number and percentage of High-Need Children in Early Learning and Development Programs that-- (i) Participate in programs covered by the Tiered Quality Rating and Improvement System; and (ii) Participate in programs that are in the top tiers of the Tiered Quality Rating and Improvement System</p>	
<p>(C)(4) Validating the effectiveness of the State Tiered Quality</p>	

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>Rating and Improvement System in improving school readiness. The extent to which the State has a High-Quality Plan to demonstrate the relationship between quality ratings and the learning outcomes of children served by Early Learning and Development Programs, by validating that the tiers in the State’s Tiered Quality Rating and Improvement System accurately reflect differential levels of quality, are related to progress in learning and development, and build toward school readiness.</p>	
<p>D. A Great Early Childhood Education Workforce</p>	
<p>(D)(1) Developing Workforce Knowledge and Competencies and a progression of credentials. The extent to which the State has developed, or has a High-Quality Plan to develop, a common Statewide-- (a) Set of Workforce Knowledge and Competencies designed to promote children’s learning and development and improve outcomes; and (b) Progression of credentials and degrees aligned with the Workforce Knowledge and Competencies</p>	<p>We recommend including Family Leadership and Support within the Set of Workforce Knowledge and Competencies, as follows: “Set of Workforce Knowledge and Competencies designed to promote children’s learning and development, support parents in their role as their children’s first teachers, and improve outcomes;” The intent is to incorporate the Family Leadership and Support Standards into the Workforce Knowledge and Competencies. There are examples of States that have already done this through the Strengthening Families initiative.</p>
<p>(D)(2) Supporting Early Childhood Educators in improving their knowledge, skills, and abilities. The extent to which the State has a High-Quality Plan to improve the effectiveness and retention of Early Childhood Educators with the goal of improving child outcomes through-- (a) Professional development opportunities that are aligned with its Workforce Knowledge and Competencies; (b) Policies and incentives, (e.g., scholarships, compensation and wage supplements, tiered reimbursement rates, other financial incentives, management opportunities), that promote professional development and career advancement along an articulated career pathway; and (c) Setting ambitious yet achievable targets for: (i) Increasing Early Childhood Educator retention rates; and (ii) Increasing the number and percentage of Early Childhood Educators moving up through the progression of credentials.</p>	<p>The State plan to provide professional development opportunities that are aligned with the Workforce Knowledge and Competencies should include high-quality professional development on the Family Leadership and Support Standards. Examples exist across many States that have developed training modules on the Strengthening Families Protective Factors, incorporated the concepts within existing curricula, and even created professional specializations for those who complete required courses and field experiences based on the Strengthening Families approach and Protective Factors framework.</p>

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>(D)(3) Partnering with postsecondary institutions and other professional development providers in developing effective Early Childhood Educators.</p> <p>The extent to which the State has a High-Quality Plan to meet ambitious yet achievable annual targets for increasing the number of postsecondary institutions and other professional development providers that have aligned their programs with the State’s Workforce Knowledge and Competencies and progression of credentials, and the number of Early Childhood Educators that these institutions credential annually.</p>	
<p>DEFINITIONS</p>	
<p>Common Education Data Standards (CEDS) means voluntary, common standards for a key set of education data elements (e.g., demographics, program participation, transition, and course information) at the early learning, K-12, and postsecondary levels developed through a national collaborative effort being led by the National Center for Education Statistics. CEDS focus on standard definitions, code sets, and technical specifications of a subset of key data elements and are designed to increase data interoperability, portability, and comparability across early learning programs and agencies, States, districts, and postsecondary institutions.</p>	
<p>Comprehensive Assessment System means a coordinated and comprehensive system of multiple assessments – each of which is valid and reliable for its specified purpose and for the population with which it will be used – that organizes information about the process and context of young children’s learning and development in order to help Early Childhood Educators make informed instructional and programmatic decisions. A Comprehensive Assessment System includes, at a minimum--</p> <ul style="list-style-type: none"> (a) Screening Measures; (b) Formative Assessments; (c) Measures of Environmental Quality; and (d) Measures of the Quality of Adult-Child Interactions. 	<p>We encourage the Administration to require States to include a valid and reliable tool to measure the extent to which programs and professionals are meeting the Family Leadership and Support Standards. By way of example, we offer CSSP’s Strengthening Families Program Self-Assessment as a model for such a tool. The Self-Assessment is a valid and reliable instrument for measuring the extent to which a program uses seven strategies that our field research identified as used by exemplary programs to support families:</p> <ul style="list-style-type: none"> 1. Facilitate friendships and mutual support 2. Strengthen parenting 3. Respond to family crises

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
	<ol style="list-style-type: none"> 4. Link families to services and opportunities 5. Facilitate children’s social and emotional development 6. Observe and respond to early warning signs of child abuse or neglect 7. Value and support parents <p>CSSP has developed an on-line version of the Self-Assessment that enables programs to compile responses from staff, parents and administrators, compare responses over time, and develop an action plan for continuous improvement. Data can be aggregated across programs and at the State level to provide snapshot information, monitor trends, and inform policy. This tool demonstrates the realistic potential to include Family Leadership and Support measures within a comprehensive Assessment System.</p>
<p>Data System Oversight Requirements means policies for ensuring the quality, privacy, and integrity of data contained in a data system, including--</p> <p>(a) A data governance policy that identifies the elements that are collected and maintained; provides for training of system users in internal controls; establishes who will have access to the information and how the information may be used; sets appropriate internal controls to restrict access to only authorized users; sets criteria for determining the legitimacy of data requests; establishes processes that verify the accuracy, completeness, and age of the information elements maintained in the system; sets procedures for determining the sensitivity of each inventoried element and the risk of harm if that information was improperly disclosed; and establishes procedures for disclosure review and auditing; and</p> <p>(b) A transparency policy that informs the public, including families, Early Childhood Educators, and programs of the existence of data systems that house personally identifiable information, explains what data elements are included in such a system, enables parental consent to disclose personally identifiable information as appropriate, and describes allowable and potential uses of the data.</p>	
<p>Early Childhood Educator means any professional working in Early</p>	<p>We recommend the inclusion of</p>

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>Learning and Development Programs, including but not limited to center-based and family child care providers, infant and toddler specialists, early intervention specialists and early childhood special educators, home visitors, related service providers, administrators, Head Start teachers, Early Head Start teachers, preschool and other teachers, teacher assistants, family service staff, and health coordinators.</p>	<ul style="list-style-type: none"> • Family, Friend and Neighbor (FFN) care providers (also known as non-licensed or informal care) • parent educators • Family Leadership and Support specialists / coordinators, or other similarly defined professionals who directly support parents at the program level (or help other professionals to do so), and/or who support parents in their roles as partners in governance, policy formation, program oversight, etc. at the program and State policy level.
<p>Early Learning and Development Program means any (a) State-licensed or State regulated program or provider, regardless of setting or funding source, that provides early care and education for children from birth to kindergarten entry, including, but not limited to, programs operated by child care centers and in family child care homes; (b) preschool programs funded by the Federal government, State or local educational agencies (including Individuals with Disabilities Education Act-funded programs); (c) Early Head Start and Head Start programs; and (d) any non-relative child care providers not otherwise regulated by the State and regularly cares for two or more unrelated children for a fee in a provider setting.</p>	<p>We reiterate our previous recommendation related to the criteria language and encourage the secretaries to modify the definition of Early of Early Learning and Development Programs to: 1) reflect the importance of children’s successful transition into kindergarten; and 2) encourage strong relationships and coordination between Early Learning and Development Programs and public schools.</p> <p>To this end, we recommend replacing “from birth to kindergarten entry” with “from birth through transition to kindergarten, ” as follows:</p> <p>“Early Learning and Development Program means any (a) State-licensed or State regulated program or provider, regardless of setting or funding source, that provides early care and education for children from birth through transition to kindergarten. “</p> <p>We also assume that the definition proposed by the secretaries includes Family, Friend and Neighbor care providers (also known as non-licensed or informal care). If not, then we recommend that it do so.</p>
<p>Early Learning Intermediary Organization means) an organization (Statewide, regional, or community-based) that represents networks of Early Learning and Development Programs in the State that have influence or authority over those Early Learning and Development Programs, including, but not limited to, Child Care Resource and</p>	<p>We recommend adding State Children’s Trust and Prevention Funds to this list. Many of these entities administer State and federal child abuse prevention and family support funding to community-based programs, including early learning and development programs. In many States, the Trust Fund is a lead</p>

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>Referral Agencies, State Head Start Associations, Family Child Care Associations, State affiliates of the National Association for the Education of Young Children, State affiliates of the Council for Exceptional Children’s Division of Early Childhood and, where appropriate, the National Migrant and Seasonal Head Start Association, the National Tribal, American Indian, and Alaskan Native Head Start Association, and the National Indian Child Care Association.</p>	<p>partner in encouraging programs to adopt the Strengthening Families approach. They are also supporting policy and systems change to help programs incorporate the Protective Factors into their goals and performance measures, and ultimately to better support and serve families. The Trust Funds are a critical partner in the Strengthening Families initiative and offer a wealth of experience and knowledge about how programs can support parents as decision makers and leaders.</p>
<p>Early Learning and Development Standards means a set of expectations, guidelines, or developmental milestones that describe what all children from birth until kindergarten entry should know and be able to do and their disposition toward learning. These standards must be appropriate for each age group of infants, toddlers, and preschoolers and English learners, and for children with developmental delays and disabilities. In addition, the standards must cover all the Essential Domains of School Readiness, and must be developmentally, linguistically, and culturally appropriate.</p>	<p>As we have discussed in previous comments, we recommend the addition of a definition for Family Leadership and Support Standards that describe what all families need and what programs, professionals, and systems should do to optimize parents’ role as their children’s first teachers and value them as decision makers and leaders. These standards must be appropriate for all families and be linguistically and culturally appropriate.</p> <p>We recommend that the Strengthening Families approach and Protective Factors Framework be considered as a model and starting point for the creation of these standards, and offer available implementation tools to support replication of effective strategies across states.</p>
<p>Essential Data Elements means the critical child, program, and workforce data elements of a coordinated early learning data system, including--</p> <ul style="list-style-type: none"> (a) A unique Statewide child identifier or another highly accurate, proven method to link data on that child to and from the Statewide Longitudinal Data System, including kindergarten entry assessment data; (a) A unique Statewide worker/teacher identifier; (b) A unique program site identifier; (c) Child and family demographic information; (e) Early Childhood Educator demographic information including data on educational attainment and State credential or licenses held, as well as professional development information; (f) Data on the program’s structure, quality, child suspension and 	<p>We recommend including data from the proposed Family Leadership and Support assessment tool among the essential data elements. This could include child-, family-, and/or school-level data on Family Leadership and Support activities; data on the number of parents engaged in various leadership roles in the program, policy, evaluation and oversight of the system; the types and frequency of training and other supports provided to parents in these roles.</p> <p>We also recommend inclusion of aggregate and disaggregated data (by school district) on the number and percentage of young children who: are in foster care and the differential response system; have been referred to child welfare; are receiving Part C Early Intervention services; are children of teen parents; have been exposed to domestic violence in the home; and children whose</p>

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>expulsion rates, staff retention, and work environment, including all applicable data reported as part of the State’s Tiered Quality Rating and Improvement System; and (g) Child-level program participation and attendance data.</p>	<p>parents suffer from depression, other mental health problems, or substance abuse.</p>
<p>Essential Domains of School Readiness means the domains of language and literacy development, cognition and general knowledge (including early mathematics and early scientific development), approaches toward learning, physical well-being and motor development, and social and emotional development.</p>	
<p>Formative Assessment means assessment questions, tools, and processes that are specifically designed to monitor children’s progress along the Early Learning and Development Standards and to guide and improve instructional practice, and are valid and reliable for their intended purposes and their target populations.</p>	
<p>High-Need Children means children from birth until kindergarten entry who are from low-income families or otherwise in need of special assistance and support, including children who have disabilities or developmental delays, who are English learners, who reside on “Indian lands” as that term is defined by Section 8013(6) of the Elementary and Secondary Education Act, of 1965, who are migrant, homeless, or in foster care; and other children as identified by the State.</p>	<p>We recommend that the definition of High-Need Children include children of teen parents; children who have been exposed to domestic violence in the home; children who are or have ever been connected to the child welfare system (not just those currently in foster care), including those in families served through a State’s differential response system; children who are at risk of developmental delays or disabilities (not just those who already demonstrate delay, for example, those with extremely low birth weight and who required prolonged neonatal intensive care); and children whose parents suffer from depression, other mental health problems, or substance abuse.</p> <p>We also recommend that the definition also include children who belong to racial and ethnic groups associated with persistent achievement gaps.</p>
<p>High-Quality Plan means a plan that includes, at a minimum, the following components-- (a) A description of the current policies, practices, and resources; (b) The key goals of the plan. (c) The key activities to be undertaken and rationale for the</p>	

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>activities, which include why the specific activities are thought to bring about the change envisioned and how these activities are linked to the key goals of the plan, and an explanation of how the policies, practices, and resources described in (a) will change as a result of implementing this plan, if applicable.</p> <p>(d) The timeline for implementing the activities;</p> <p>(e) The party or parties responsible for implementing each activity;</p> <p>(f) The information requested in the performance measures, where applicable;</p> <p>(g) The information requested under the selection criteria as supporting evidence, if any, together with any additional information the State believes will be helpful to peer reviewers in judging the credibility of the plan; and</p> <p>(h) Any specific elements of the plan that describe how the State will meet the unique needs of the following categories of High-Need Children (as applicable): children who have disabilities or developmental delays, who are English learners, who are living in Tribal communities, and who are homeless or in foster care; and other children as identified by the State.</p>	
<p>Lead Agency means the State-level agency designated by the Governor for the administration of the grant; this agency is the fiscal agent for the grant. The Lead Agency must be one of the Participating State Agencies</p>	
<p>Measures of Environmental Quality means valid and reliable indicators of the overall quality of the early learning environment.</p>	
<p>Measures of the Quality of Adult-Child Interactions means the measures obtained through a valid and reliable process for observing how teachers and caregivers interact with children. The process should be designed to promote child learning and development and to identify strengths and areas for improvement for early learning professionals</p>	<p>We recommend including within this definition or as a new item a definition related to Measure of the Quality of Adult-Adult (or Teacher/Caregiver – Parent) Interactions. This would mean the measures obtained through a valid and reliable process for observing how teachers and caregivers interact with parents. The process should be designed to promote effective Family Leadership and Support strategies (aligned to the Family Leadership and Support Standards) and to identify strengths and areas for improvement for early learning professionals and programs.</p>

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>Participating State Agency means a State agency that administers public funds related to early learning and development and is participating in the State Plan. The following State agencies must be Participating State Agencies: the agencies that administer or supervise the administration of the Child Care Development Fund (CCDF), the Individuals with Disabilities Education Act Part C and Part B Section 619, State-funded preschool, Home Visiting, Title I of the Elementary and Secondary Education Act of 1965 (ESEA), the Head Start State Collaboration Grant, the State Advisory Council on Early Care and Education, and Title V Maternal and Child Health Block Grant; and the State’s Child Care Licensing Agency and the State’s Education Agency. Other State agencies, such as the agencies that administer or supervise the administration of Child Welfare, Mental Health, Temporary Assistance for Needy Families, Community-Based Child Abuse Prevention, the Child and Adult Care Food Program, and the Adult Education and Family Literacy Act (AEFLA), are encouraged to participate in the State Plan.</p>	<p>As we mention in previous comments, to support our recommendation that States be required to develop a specific plan for ensuring access to high quality early learning and development programs for the most vulnerable young children (e.g., those in foster care, those with disabilities, etc.), the Administration should require that State Child Welfare agencies, Medicaid and/or State Children’s Health Insurance Program agencies, and Community-Based Child Abuse Prevention agencies be included as required Participating State Agencies to help develop this plan.</p>
<p>Participating Program means an Early Learning and Development Program that elects to carry out activities described in the State Plan.</p>	
<p>Program Standards means the standards that serve as the basis for a Tiered Quality Rating and Improvement System and define levels of quality for Early Learning and Development Programs. Program Standards are expressed, at a minimum, by the extent to which--</p> <ul style="list-style-type: none"> (a) Early Learning and Development Standards are implemented through evidence-based activities, interventions, or curricula that are appropriate for each age group of infants, toddlers, and preschoolers; (b) Comprehensive Assessment Systems are used routinely and appropriately to improve instruction and enhance program quality by providing robust and coherent evidence of-- <ul style="list-style-type: none"> (i) Children’s learning outcomes and development; and (ii) Program performance; (c) A qualified workforce improves young children’s health, social, emotional, and educational outcomes; 	<p>We recommend that the definition of Program Standards also specify that they are expressed by the extent to which Family Leadership and Support Standards are implemented through research-based activities and strategies that are linguistically and culturally appropriate for all families, as described in (d).</p>

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>(d) Strategies are successfully used to engage families in supporting their children’s development and learning, including but not limited to: parent access to the program, ongoing two-way communication with families, parent education in child development, outreach to fathers and other family members, training and support for families as children move to preschool and kindergarten, social networks of support, intergenerational activities, linkages with community supports and family literacy programs, parent involvement in decision-making, and parent leadership development;</p> <p>(e) Health promotion practices include developmental, behavioral, and sensory screening, referral, and follow up; promote physical activity, healthy eating habits, oral health and behavioral health; and support health literacy among parents;</p> <p>(f) Effective data practices include gathering Essential Data Elements and entering them into the State’s Statewide Longitudinal Data System or other early learning data system, using these data to guide instruction and program improvement, and making this information readily available to families.</p>	
<p>Screening Measures means age- and developmentally appropriate, valid, and reliable instruments that are used to identify children who may need follow-up services to address developmental, learning, or health needs in, at a minimum, the areas of physical health, behavioral health, oral health, child development, vision, and hearing.</p>	
<p>State Plan means the plan submitted as part of the State’s Race to the Top-Early Learning Challenge application.</p>	
<p>Statewide Longitudinal Data System means the State’s longitudinal education data system that collects and maintains detailed, high-quality, student- and staff-level data that are linked across entities and, over time, providing a complete academic and performance history for each student. The Statewide Longitudinal Data System is typically housed within the State educational agency but includes or can be connected to early childhood, postsecondary, and labor data</p>	

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>Tiered Quality Rating and Improvement System means the system through which the State uses a set of progressively higher Program Standards to evaluate the quality of an Early Learning and Development Program and to support program improvement. A Tiered Quality Rating and Improvement System consists of four components: (1) tiered Program Standards with multiple rating categories that clearly and meaningfully differentiate program quality levels; (2) monitoring to evaluate program quality based on the Program Standards; (3) supports to help programs meet progressively higher standards (e.g., through training, technical assistance, financial support); and (4) public availability of program quality ratings; and includes a process for validating the system.</p>	
<p>Workforce Knowledge and Competencies means the set of expectations that describes what Early Childhood Educators (including those working with children with disabilities and English learners) should know and be able to do. These must, at a minimum, be evidence-based; incorporate knowledge and application of the State’s Early Learning and Development Standards, the State’s Comprehensive Assessment System, child development, and strategies for working with families; and incorporate feedback from experts at the State’s postsecondary institutions and other early learning and development experts.</p>	<p>We recommend that the definition of Workforce Knowledge and Competencies explicitly refer to incorporation of “knowledge and application of the State’s Family Leadership and Support Standards” in place of “strategies for working with families.”</p>
<p>PROGRAM REQUIREMENTS A State that receives a grant must meet the following requirements:</p>	
<p>(a) The State will continue to participate in the programs authorized by Section 619, Part B, and Part C of the Individuals with Disabilities Education Act (20 U.S.C. 1419, seq.1431 et seq.), in the Child Care and development Fund (CCDF) program (pursuant to the Child Care and Development Block Grant Act (42 U.S.C. 9858 et seq.) and Section 418 of the Social security Act (42 U.S.C. 618) and) program, and the Maternal, Infant, and Early Childhood Home Visiting program (Section 511 of Title V of the Social Security Act, as added by Section 2951 of the Affordable Care Act of 2010 (P.L. 111-148) for the duration of this grant.</p>	

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
(b) The State may not spend funds from this grant on the direct delivery of health services.	
(c) The State must participate in grantee technical assistance activities facilitated by ED or HHS, individually or in collaboration with other State grantees, to share effective program practices and solutions and collaboratively solve problems, and must set aside at least 1 percent from its grant funds for this purpose.	
(d) The State must participate in any evaluation of the State’s proposed reforms, including participating with a consortium of States in a cross-State evaluation, if funded by ED or HHS.	
(e) The State must have a longitudinal data system that includes the 12 elements described in Section 6401(e)(2)(D) of the America COMPETES Act by the date required under the State Fiscal Stabilization Fund (SFSF) grant and in accordance with its approved SFSF plan for Indicator b(1).	
(f) The State must comply with the requirements of all applicable Federal, State, and local privacy laws, including the requirements of the Family Educational Rights and Privacy Act, the Health Insurance Portability Accountability Act, and the Individuals with Disabilities Education Act, and their applicable regulations.	
(g) The State and its Participating State Agencies must ensure that the grant project is implemented in accordance with all applicable Federal, State, and local laws.	
(h) The State must provide researchers with access, consistent with the requirements of all applicable State, local and Federal privacy laws, to data from the Tiered Quality Rating and Improvement System so they can analyze the States’ quality improvement efforts and answer key policy and practice questions.	
(i) Unless otherwise protected by Federal or State law or a specific written agreement as proprietary information, the State must make	

RTT-ELC Draft Executive Summary Language	CSSP / Alliance Comments
<p>any work (e.g., materials, tools, processes, systems) developed under its grant freely available to the public, including by posting the work on a website identified or sponsored by the Department. Any websites developed under this grant must meet government or industry-recognized standards for accessibility.</p>	
<p>(j) Funds made available under this grant must be used to supplement, not supplant, any Federal, State, or local funds that, in the absence of the funds awarded under this grant, would be available for increasing access to and improving the quality of Early Learning and Development Programs.</p>	