

April 26, 2018

The Honorable Alex Azar  
Secretary  
U.S. Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, D.C. 20201

The Honorable Betsy DeVos  
Secretary  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, D.C. 20202

Dear Secretary Azar and Secretary DeVos,

We are writing to share comments on the forthcoming implementation of the new Preschool Development Grant (PDG) program, as recently authorized under the Every Student Succeeds Act (ESSA), our nation's primary education law. The organizations named below are committed to increasing access to affordable, high-quality early childhood education (ECE) for children beginning at birth. PDG, as outlined in ESSA, is the first time dedicated funding to early learning has been included in the Elementary and Secondary Education Act since it first became law in 1965. This is a meaningful step that builds on work states have done to develop and sustain strong early learning systems, and elevates early childhood education within the larger continuum of learning.

The intent of this program is to improve the coordination, quality, and access of ECE for low- and moderate-income children from birth to age five. The program also provides an opportunity to reinforce the elements in ESSA that support increased connections between early childhood and the K-12 system, such as transition planning and joint professional development opportunities. These efforts at the state and local level will help maximize parent choice within a high-quality mixed-delivery system, so that children enter kindergarten ready to learn.

In allocating \$250 million for PDGs, Congress has given the Administration an opportunity to create a meaningful program. Successfully implementing it will take comprehensive intra-government coordination at all levels and presents a tremendous opportunity for your departments to innovatively collaborate and align. As implementation moves forward, we offer the following recommendations to help establish priorities that will help advance the goals of the program and benefit children and families.

**Utilize a competitive grant structure in order to achieve the high-quality standard the Preschool Development Grant program is designed to help states establish and maintain.**

A competitive Preschool Development Grant will promote accountability to ambitious state goals and enable grantees to access sufficient funding to actualize their plans. Given that the circumstances in states varies across the country, a competitive grant structure will enable grantees to be responsive to the unique needs of the children and families in local communities, as opposed to a one-size-fits-all approach.

The structure itself provides a critical opportunity for the Administration to communicate the importance of increasing access to quality, while elevating states who have created systems that support this goal. Since system-building efforts are undertaken in service of that goal, the structure of the grant should be designed to help states measure and be held accountable for whether the systems-building work moves the needle on its achievement. In order to do this, the Administration could consider the extent to which state-funded preschool dollars are going to community based programs like Early Head Start and Head Start and child care; the degree to which a state has improved its own standards for state-funded pre-k and child care; and the level to which a state has directly responded to meet the needs identified in the required needs assessments could be considered.

**Needs Assessments should equip states to develop ambitious Strategic Plans.**

As outlined in the program requirements, and in order to be responsive to state and local context, grantees must conduct a needs assessment. The Administration should clarify that states can and should make use of relevant existing data and should focus the needs assessment on positioning states to develop a strategic plan that addresses the following goals:

1. Families are able to choose and afford quality early childhood education in a mixed-delivery system that is inclusive of existing programs and providers, including programs for infants and toddlers
2. Early childhood education program providers share best practices to increase collaboration and efficiency of services,
3. Early childhood education providers are able to access evidence-based, high-quality professional development opportunities that improve the overall quality of early childhood education for children across settings

**Renewal Grants should strive for continuous improvement in order to better serve children in the state's system.**

As the competitive grant structure is implemented, states that were previously grantees of the legacy PDG program may apply for a renewal grant for a period of not more than 3 years. These states must conduct an updated needs assessment which reflects the priorities of the new program, along with a strategic plan that aligns with the purpose of the ESSA PDG. We encourage renewal grants be awarded to grantees that commit to continuous improvement and evaluation, and who would provide sub-grants to existing programs to address areas in need of improvement as identified in their updated needs assessment.

The establishment of the PDG under ESSA is a significant bipartisan accomplishment that could substantially contribute to ensuring all children are set up for success in school and life, starting with access to high-quality early childhood education beginning at birth. Our organizations are appreciative of the thoughtful efforts undertaken by HHS and ED to execute this important opportunity and encourage you to reach out to us for ongoing resources and support as we collectively strive to help the program reach its full potential.

Sincerely,

AASA, The School Superintendents Association

Association of Educational Service Agencies (AESAs)

Child Care Aware of America (CCAoA)

Center for Law & Social Policy (CLASP)

Council of Chief State School Officers (CCSSO)

Early Care and Education Consortium (ECEC)

First Five Years Fund (FFYF)

KinderCare

MomsRising

National Association of Elementary School Principals (NAESP)

National Association of Public Charter Schools (NAPCS)

National Association of School Superintendents (NASS)

National Association of State Boards of Education (NASBE)

National Association for the Education of Young Children (NAEYC)

National Education Association (NEA)

National Governors Association (NGA)

National Women's Law Center (NWLC)

Ounce of Prevention Fund

Partnership for 21st Century Learning (P21)

Save the Children Action Network (SCAN)

ZERO TO THREE (ZTT)

cc:

The Honorable Lamar Alexander  
Chairman  
Senate Health, Education, Labor and Pensions

The Honorable Patty Murray  
Ranking Member  
Senate Health, Education, Labor and Pensions

The Honorable Virginia Foxx  
Chairwoman  
House Education & the Workforce

The Honorable Bobby Scott  
Ranking Member  
House Education & the Workforce