The Policy Committee of the Grow America Stronger campaign is pleased to present the following recommendations to the Administration for the implementation of the $250 million in Race to the Top (RTT) funds to develop, enhance, or expand high-quality preschool programs. We strongly support the language in the legislation and joint committee report on mixed delivery, support for the early childhood workforce, comprehensive services, and family engagement. We encourage the Administration to substantially incorporate these components into the state application. (Corresponding legislative and report language can be found at the conclusion of this document).

We understand the challenge the Administration faces in determining how to best utilize very limited funds to expand preschool, particularly given that these are one-time funds for states. We encourage you to consider the following principles, with the overarching goal of improving access to high-quality preschool for low-income children. States should use the funds provided under these grants in one of two ways: make progress toward meeting high-quality standards in existing preschool slots, or expand slots to additional low-income children in programs that already meet high quality standards. Regardless of which approach the state chooses, the state should have the flexibility to target specific geographic areas within the state if funds are not sufficient to implement expanded access to high-quality preschool state-wide. Both approaches should also include investments in the early childhood workforce, such as funds to help early childhood educators to attain higher credentials and degrees and better compensation.

We also recommend the following principles to guide the implementation of these grants:

- **Maximize state inclusion:** Across the country, there is momentum and excitement around expanding access to high quality preschool. To capitalize on this momentum, all states should be
eligible to apply for either a low or high capacity grant. This approach will encourage as many states as possible to think strategically about how to move more low-income children to high-quality preschool, regardless of whether or not the state ultimately receives a grant. Criteria that support this principle include:

- Ensure all states are eligible for either a low or high capacity state grant. Avoid criteria that would automatically disqualify a state from applying for either grant and develop different criteria for low and high capacity states so that states starting with no preschool program or a small program can be competitive.
- Allow states with a RTT Early Learning Challenge grant to compete, but do not preference these states. States that received a RTT ELC grant should focus these grant funds on expanding access to high-quality preschool, either by improving quality in existing slots that do not meet standards, or by expanding slots in preschool programs that already meet high quality standards. Funds under this grant should be separate from RTT ELC activities and should not support further systems building work given the considerable need for preschool expansion for low-income children.
- Consider allowing a state official other than the governor to submit the state’s application, such as the head of a state agency or cabinet level official. To assure alignment across early childhood programs, the application must include multiple signatories from the State Early Care and Education Advisory Council and state agencies with jurisdiction over early childhood programs, such as CCDBG and home visiting.

### Maintain state flexibility

- States are in various stages in implementation of preschool programs and should have discretion to decide whether funds are best used for expansion or quality improvement. States should articulate in the application how they will improve access to high-quality preschool for low-income children, which may include expansion of a high-quality program or improving existing slots to meet higher quality standards. Criteria that support this principle include:
  - Allow states that partially meet the quality standards to use funds to improve quality in existing slots. For example, one state may use funds to expand their existing part-day preschool program to a full day.
  - States should conduct a needs assessment to identify concentrations of low-income children with the highest needs who do not have access to high-quality preschool, including children who are dual language learners and children with other characteristics or risk factors that suggest they will benefit from access to high-quality preschool.
  - Allow states to pilot preschool expansion or quality improvement in targeted geographic areas if funds are insufficient for statewide implementation.
  - Avoid requirements that would upset existing state financing mechanisms.

### Set high quality standards

- A large body of research shows that high-quality preschool programs lead to benefits for children and families. It is essential that preschool programs funded under this grant meet high-quality standards, and we recommend the standards in the Strong Start for America’s Children Act. Criteria that support this principle include:
  - New slots funded under this grant should meet the Strong Start standards.
  - States should decide how they will make progress toward meeting the Strong Start quality standards in existing slots.
  - In each case, states should describe how they will make investments in the workforce to support early childhood educators in all settings to meet education standards and to
receive professional development. States should consider cultural and linguistic competency in the workforce.

- Standards should include family engagement (such as parent education) and comprehensive services components.
- Standards should address the needs of culturally and linguistically diverse families (including Dual Language Learners) and children with special needs.

**Maintain existing investments in early childhood:** Funding for early childhood is limited at the state and federal level, especially compared to amounts for K-12 education. Both Head Start and the Child Care and Development Block Grant (CCDBG) are underfunded and serve only a fraction of eligible children. Many states and communities have long waiting lists for both Head Start and CCDBG. These new preschool funds should augment the total investment in early childhood. States should not be allowed to scale back state or federal funding as a result of receiving these funds, nor should they undermine services for infants and toddlers. Criteria that support this principle include:

  - Include “supplement not supplant” language from RTT ELC.
  - Require a maintenance of effort such that states maintain their investments in state-funded preschool and state funding for early childhood programs (including child care and home visiting) at the 2011, 2012 or 2013 level, whichever is higher.
  - Require that states (and localities if applicable) maintain 2012 or 2013 allocations (whichever is higher) toward early childhood in flexible funding streams (i.e. TANF, SSBG, Title I).
  - Require states to show that new preschool efforts will not result in a diminution of services or quality improvement efforts for infants and toddlers in the geographic areas served by expanded preschool services.
  - Encourage states to leverage and coordinate other federally-funded programs, including CCDBG, Head Start, Maternal Infant Early Childhood Home Visiting, Individuals with Disabilities Education Act Parts B and C, and TANF.

**Promote a mixed delivery system:** The majority of state preschool programs use a mixed delivery model, and this approach should continue. Preschool expansion should include a wide range of early childhood education providers that meet high quality standards, such as schools, Head Start, child care, and private preschool programs. A diverse-delivery system has many benefits. It improves program access and gives parents choice. It solves the problem of limited space in schools and is cost-effective. Most important, it engages the expertise of the entire early education community. Criteria that support this principle include:

  - Reward states that plan to distribute the funds within the state to community-based providers (child care and Head Start), local school districts and schools to enroll eligible children and to meet and sustain the standards for the preschool program.
  - Allow flexibility in the manner and content of the local partnerships between schools and community-based providers to reflect local resources, conditions, and needs.
  - Allow states to subgrant funds to community-based providers if they have a teacher enrolled in a B.A. program and making progress to the degree, with incremental parity of compensation as the degree is pursued.

**Support workforce investments:** A well-qualified, well-compensated workforce is a key component in creating a quality preschool program. States should consider how they will recruit and retain highly qualified preschool early childhood educators in their state. To meet known
quality requirements, early childhood educators will need a B.A. in early childhood education or a related field, or demonstrate competency through training or an exam. Early childhood educators will need help in order to attain required qualifications, including scholarships and release time. In addition, states will need to pay early childhood educators wages comparable to the K-12 system once they have a B.A. in order to retain them. Criteria that support this principle include:

- States cannot expand access to high-quality preschool without a well-qualified, well-compensated workforce in place to support expansion. State plans should address how they will support early childhood educators in pursuing a B.A. degree in early childhood education or a B.A. degree in a related field with demonstrated competency in early childhood education.
- States should also address the current workforce demographics and an approach to support a culturally and linguistically diverse workforce. In areas with a large or increasing numbers of DLLs, states should consider how to incorporate dual language acquisition and effective teaching practices for DLL students into professional development and training.
- Allow states to use funds to help early childhood educators attain B.A.s through scholarships and related support services such as substitutes and paid release time.
- States should describe how the per-child payment for preschool will support compensation and benefits that are comparable to the K-12 school system.
- Give states flexibility in phasing in teacher degree requirements, particularly if the teacher is enrolled in and making progress toward the B.A. degree. This might include setting incremental goals toward all early childhood educators in the preschool program having a B.A.
- States should address the steps they will take to promote retaining a high-quality early childhood education workforce from birth and avoid losing well qualified teachers in the early years to preschool classrooms or elementary schools.

- **Sustain funds after the grant period**: Given that these funds are one-time, it’s critical that slots or quality improvements continue beyond the life of the grant. These funds should not be used to fund slots that will end after three years. Criteria that support this principle include:
  - States should articulate a preschool expansion plan that describes how they will expand or sustain high-quality preschool for all low-income children in the state, even if the plan extends beyond the grant period.
  - States should describe how the activities funded under this grant will support the longer term preschool expansion plan and be sustained in the long term.
  - States should show strong commitment to expanding access to high-quality preschool by allocating state resources to build on the federal investment.

- **Spur preschool investment in states with no program**: The states without a state preschool program should be specifically targeted. These states have the most progress to make, and the biggest opportunity to make preschool for all children in the country a reality. It is important that these states have an opportunity to compete. We recommend a grant competition targeted to states that do not have a state program that would provide funds for planning and a pilot program. Criteria that support this principle include:
  - Allow states to apply for a small grant to fund planning, technical assistance, and a preschool pilot program.
Preference states that show their commitment by allocating state resources (including in-kind resources) to develop a preschool plan.

States should include administrators of other state and federal programs in the planning process.

- **Encourage states to provide a trajectory of high quality programs for children from the prenatal period:** We know that children begin learning at birth and that children have the best outcomes when they receive high-quality early learning for multiple years. States should use these funds to help build a pipeline of services for children from birth to kindergarten entry. Criteria that support this principle include:
  - States should describe how they will align and coordinate preschool programs with services for infants and toddlers, including Early Head Start, CCDBG, and home visiting.
  - States should describe how they will promote continuous access to high-quality programs from the prenatal period to age five (including home visiting and Early Head Start).
  - States should describe how they will address transitions for children from preschool to kindergarten.

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**Legislative Language:**

- The Administration shall use funds to make competitive awards to States for improving early childhood care and education.

- Awards may be limited to activities that build the capacity within the State to develop, enhance, or expand high-quality preschool programs, including comprehensive services and family engagement, for preschool-aged children from families at or below 200 percent of the Federal poverty line.

- Each state may subgrant a portion of such grant funds to local educational agencies and other early learning providers (including but not limited to Head Start programs and licensed child care providers), or consortia thereof, for the implementation of high-quality preschool programs for children from families at or below 200 percent of the Federal poverty line.

- Subgrantees that are local educational agencies shall form strong partnerships with early learning providers and subgrantees that are early learning providers shall form strong partnerships with local educational agencies, in order to carry out the requirements of the subgrant.

- Up to 3 percent of funds are available for improving early childhood care and education and shall be available for technical assistance, evaluation, and other national activities related to such grants.

- The Secretary may renew a grant made for additional 1-year periods, for fiscal year 2014 and there-after, if the grantee is meeting its performance targets, up to a total award period of 6 years.
Report Language:

- Funds may be used for competitive awards to States to develop, enhance, or expand high-quality preschool programs and early childhood education programs for children from low- and moderate-income families, including children with disabilities.

- Two types of grants can be awarded to States, one to low-capacity States with small or no State-funded preschool programs and another to high-capacity States that have a larger State-funded preschool program.

- High-quality programs should include comprehensive services and family engagement. It is expected that funds will be used to help programs meet and sustain nationally recognized standards in those areas and promote culturally and linguistically competent strategies that encourage parent involvement in their native language and support parents in creating engaging language and literacy experiences at home to reinforce children’s learning at preschool.

- Funds may also be used to help early childhood educators to attain higher credentials and degrees.

- The bill does not provide authority for funding to be used for construction, renovation, modernization, or related activities.

- States can determine the amount of funding distributed in subgrants to eligible entities for implementation of high-quality preschool programs from low- and moderate-income families.

- Any use of assessment must conform with the recommendations of the National Research Council’s reports on early childhood.