



NATIONAL HEAD START ASSOCIATION

May 25, 2016

The Honorable John King
Secretary
US Department of Education
400 Maryland Ave SW
Washington, DC 20202

Dear Secretary King,

On behalf of the National Head Start Association and the Head Start community - the one million children, 200,000 staff and 1,600 grantees we represent - we are pleased to submit the following comments about non-regulatory guidance in the Every Student Succeeds Act of 2015 (ESSA). We believe that every child, regardless of circumstances at birth, has the ability to succeed in school and in life if given the opportunity - such as that which Head Start promises to children and their families - and we remain committed to maximizing that opportunity. Building off of our comments on recommended regulatory action in Title I submitted in January 2016, the following comments focus on three areas of non-regulatory guidance: effectively expanding access to quality early learning, encouraging meaningful parent/family engagement in the broader K-12 system and improving coordination between existing early learning providers and Local Education Agencies (LEAs). We appreciate the opportunity to provide comments and commend the Department for its inclusive approach towards implementing the landmark ESSA legislation.

EXPANDING ACCESS TO QUALITY EARLY LEARNING

While previous iterations of the Elementary and Secondary Education Act (ESEA) allowed the use of Title I funds for early learning services, the ESSA takes steps to further encourage LEAs to expand and strengthen early learning services through the use of Title I funds. The Head Start community applauds Congress and the President for this focus as we, backed by decades of research, know firsthand the vital role high quality early learning plays in the



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future success of children and families – especially for our nation’s most vulnerable children. However, many LEAs are not aware of the extent to which these funds can be used to provide early learning services and, more importantly, how they can be used to support a high quality mixed delivery system of services.

In addition to LEAs, however, ESSA clearly puts much focus on the role of State Educational Agencies (SEAs). This presents a remarkable opportunity for supporting innovation and sharing examples of promising and effective practices. States exhibit differing levels of interest and experience in supporting early learning programming, but there is much to be shared and learned from their collective practices. For example, since 2011, twenty states have won Race To The Top Early Learning Challenge Grants, 18 have won Pre-K Development or Expansion Grants and most other States have expanded or further developed their own state’s early learning system predominantly through mixed delivery systems. Yet, little has been done to share impact of these grants, best practices and other information – information that could significantly help SEAs as they look to implement the ESSA. With the authorization of new Pre-K Development grants to be administered in partnership with HHS, the Department has a unique opportunity to support States and communities as they strengthen and expand early learning programming.

Therefore, we strongly urge the Administration to release non-regulatory guidance for both SEAs and LEAs on the use of funds for mixed-delivery early learning services. Specifically, we encourage non-regulatory guidance about the effective uses of Title I fund for early learning services including clear, allowable uses of funding, and best practices for effective child development, expansion of high quality early learning programming, and effective collaboration/coordination with existing programs such as Head Start.

ENCOURAGING PARENT/FAMILY ENGAGEMENT

One of the unanimously agreed upon values in the education world is that for a child to succeed in school, their parents/caregivers must be engaged and supportive. As in the ESEA, the ESSA supports that value by including provisions around parent/family



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engagement and involvement. However, if these provisions continue to be treated as they have been under previous iterations of ESEA, the majority of LEAs and SEAs will continue to pay them lip service, but nothing more. For example, we constantly hear from former Head Start parents that they are **not** welcome in the K-12 setting and this needs to change if we want to build and support an effective education system. ESSA provides an opportunity to reset this course and the first steps need to be taken throughout the Department's rule-making process. We strongly urge the Department to create guidance, in partnership with the Department of Health and Human Services and evidence-based parent engagement programs, such as Head Start, for how schools can best engage and support parents in their child's education. Parent engagement can no longer be an afterthought, but must be a priority for LEAs and SEAs.

IMPROVING LOCAL COORDINATION

Early learning programs, whether in schools, Head Start classrooms, child care centers, or family homes, are built with similar but different goals. This is intentional as not all children require the same type or intensity of services as others – a child's early learning program should be based on his/her unique needs. In order for all children, with differing backgrounds and challenges, to succeed and thrive, it is essential that programs are coordinating and working in collaboration especially as early learning services such as Title I and State-based Pre-K expand across the nation.

One of the most promising and celebrated provisions of the ESSA for the Head Start community was the provision for LEAs to have agreements with Head Start programs. Since 2007, Head Start programs have had to create Memoranda of Understanding with their LEA partners, but not until ESSA have LEAs been required to do the same. As we stated in our comments in January, we strongly recommend that the Department of Education work with the Department of Health & Human Services to put forth regulations for LEAs about creating agreements with Head Start that align with the regulations Head Start already has in place.



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In addition to regulations, we also urge the Department to release non-regulatory guidance for how these agreements should be implemented and for promising practices of State and local policies that effectively support coordination and collaboration among early learning programs. For example, the state of Kentucky created a full-utilization policy where LEAs must have a signed agreement with their Head Start partners that all Head Start slots are fully utilized in their community before Pre-K is expanded. This policy has helped effectively utilize federal and state funds to meet the needs of all children and families. It should be shared with the many other SEAs who are struggling with the same issue. The lifelong success of our nation's most vulnerable children and their families depends on the ability of Head Start and their school partners to effectively collaborate and these agreements have the unique opportunity to support these partnerships.

Thank you again for the opportunity to provide feedback that will inform the implementation of the ESSA in States and communities. We also look forward to supporting the Department and the Department of Health and Human Services on the upcoming implementation and transition of the Pre-K Development Grant program. As the first step in the educational continuum for our nation's most vulnerable children and families, we stand in partnership and support of your efforts to strengthen and improve our nation's educational system.

Please do not hesitate to reach out should you require additional clarity or comments from our community.

Sincerely,

A handwritten signature in black ink that reads "Yasmina Vinci". The signature is written in a cursive, flowing style.

Yasmina Vinci
Executive Director