



NATIONAL HEAD START ASSOCIATION

July 22, 2014

The Honorable Arne Duncan
Secretary
U.S. Department of Education
300 Maryland Avenue SW
Washington, DC 20002

Dear Secretary Duncan,

On behalf of the National Head Start Association, I want to thank you for the opportunity to submit comments on the Department of Education's proposed Supplemental Priorities and Definitions for Discretionary Grant Programs.

The National Head Start Association is a non-partisan, not-for-profit organization that believes that every child, regardless of circumstances at birth, has the ability to succeed in life if given the opportunity that Head Start offers to children and their families. NHSA is the national voice of more than a million children in Head Start and Early Head Start programs in the United States.

In general, we remain highly appreciative of your continued recognition of the importance of high-quality early learning in ensuring success in school and life. Our feedback reflects the unique mission of Head Start and Early Head Start—to focus on the whole child and family and ensure that each of our young students leave our care armed with the skills necessary to transition to Kindergarten healthy, stable, and ready to learn. Our comments are as follows:

Proposed Priorities:

Proposed Priority 1--Improving Early Learning and Development Outcomes.

Comment: We support the Department's continued inclusion of early learning and development as a priority. We suggest that the final priority include an enhanced reference to "coordination" that references meaningful transition planning between early learning programs and K-12 schools, a strategy that should involve parents as partners. We propose amending subpart (c) as follows: "Improving the coordination and alignment between early learning and development systems and elementary education systems, ***including meaningful transition planning that includes parents and families***, in accordance with applicable privacy laws, to improve transitions for children from birth through third grade."

In addition, the suggested sub-priority of "*Including preschool as part of elementary education programs and systems in order to expand opportunities for preschool students and teachers*" should be clearly described to reflect the differences in developmentally

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The National Head Start Association, an independent membership organization, advocates on behalf of the entire Head Start community and provides training and resources to Head programs nationwide.

appropriate activities and practices for preschool children and the range of settings in a mixed delivery system that can best deliver preschool services to children and families.

Proposed Priority 2-- Influencing the Development of Non-Cognitive Factors

Comment: We strongly support the inclusion of this priority, and encourage the Department to support the development of tools that are geared towards appropriately measuring the development of these skills in children, as well as tools that support robust training and professional development to effectively teach and nurture these skills.

Proposed Priority 13-- Improving School Climate, Behavioral Supports, and Correctional Education

Comment: We support the inclusion of this priority, and in particular, enhanced behavioral supports for children who are experiencing serious issues unrelated to their academic settings. Low-income children are exposed to family and community violence at higher rates than other children, and the lasting effects of trauma and toxic stress they may experience call for compassion and intervention rather than expulsion and punishment.

Proposed Priority 14—Improving Parent, Family, and Community Engagement.

Comment: We strongly support the inclusion of parent, family, and community engagement as a distinct priority; it is one of the central elements of the Head Start program and research continues to support the crucial role parents play in a child's academic and life success. We encourage the Department to consider that schools have a responsibility not only to involve parents in the school environment, but also to support practices that enable learning to occur at home. Challenging home situations mean that for many at-risk students, learning is not supported; schools should be encouraged to develop and employ strategies that address child, parent, and family needs. These strategies can and should be developed in concert with community partners with the capacity to address individual needs.

Definitions:

“Children with high needs”

Comment: We support this definition, though we suggest additional clarification of “low-income.”

“Community Engagement”

Comment: We suggest the following addition to this definition: “... means the systematic **and sustained** inclusion of community organizations as partners

“Parent and family engagement”

Comment—We suggest that the Department amend this definition as follows: “Parent and family engagement means the systematic ***and sustained*** inclusion of parents and families, working in partnership with State educational agencies (SEAs), State lead agencies (under Part C of the Individuals with Disabilities Education Act (IDEA) or the State’s Race to the Top-Early Learning Challenge grant), local educational agencies (LEAs), or other educational institutions, or their staff, in their child’s education, which may include strengthening the ability of (a) parents and families to support their child’s education and (b) school staff to work with parents and families, ***including the transition of parents and families from early learning programs to the K-12 school system and connecting parents and families to any necessary social and community services.***”

Finally, we propose that the Department amend its definition of “High Quality Early Learning” as follows:

1. Placed enhanced emphasis on parent and family engagement as a separate element of high-quality early learning, rather than an example of “on site comprehensive services.” Successful early learning programs, particularly those for the most at-risk families, employ robust parent and family engagement programs that engage parents in their child’s learning, and also work outwardly to ensure the family and home environment is stable, safe, and geared towards supporting learning at home.
2. Specify that curriculum must be culturally and linguistically sensitive, as well as developmentally appropriate.

Thank you again for this opportunity to submit comments on the Department’s proposed priorities, and we look forward to continued work together.

Sincerely,



Yasmina Vinci
Executive Director
National Head Start Association