



NATIONAL HEAD START ASSOCIATION

January 29, 2015

U.S. Department of Education
400 Maryland Avenue SW.
LBJ, Mailstop L-OM-2-2E319, Room 2E103
Washington, DC 20202

Attn: Director of the Information Collection Clearance Division

To whom it may concern:

Thank you for providing us with the opportunity to submit our comments regarding the Evaluation of Preschool Special Education Practices, Phase I study (Federal Register Volume 79, Number 249 (Tuesday, December 30, 2014) Page 78415-78416).

The National Head Start Association 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. It is the national voice of more than a million children in Head Start and Early Head Start programs in the United States. Head Start and Early Head Start represent a national commitment to providing early learning opportunities for the children who are most at-risk and who have been proven to benefit most from early learning experiences.

NHSA strongly supports research that seeks to improve the quality of early education for all at-risk children. Understanding how best to meet all children's needs is critical to the mission of Head Start, yet the quality and utility of the information gathered from a randomized controlled trial (RCT) study with young children may not answer this question without jeopardizing the outcomes of some children. We are concerned with the science and ethics of a large-scale randomized controlled trial (RCT) evaluation on preschool children with special needs. A large-scale RCT would involve diverse preschool settings with a wide range of outside factors to control. Special-needs students also have diverse disabilities and needs, and even with an RCT it is difficult to guarantee similarity between the intervention and control groups. Ethically, we are highly concerned with intervention or support being denied to children with disabilities when they are in the most critical period of their development.

Even so, we offer the following recommendations to enhance the quality of the study.

Curricula and Intervention

- We strongly recommend incorporating developmentally and culturally appropriate curricula and evidence-based interventions. As addressed before, this large-scale RCT will involve preschools from many different communities. It is imperative that the curricula and intervention strategies are meaningful to the families that they serve.
- Teachers should receive training and on-going professional development on both the curricula and intervention strategies to enhance their skills. Also, a teacher focus group should be included in the study that questions what teachers perceived as the relative usefulness of trainings from various sources (mentors, program staff, consultants, state T/TA, etc.). This will help address questions of the quality of the curricula and intervention that the children receive.

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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.

Study Context and Participants

- Research by Dr. Robert Pianta and many others underscore the affect that a teacher has on a child's academic achievement. Therefore, we recommend that the study also record information on teacher qualifications. Some criteria to include are level of education, years of teaching experience, and type of teacher preparation program completed.
- We strongly recommend that the study collect information on additional outside- and inside-school support the child receives due to his or her disability. In addition, information should be collected on whether a school has the ability to provide the support. This will help clarify whether improvement in a child's academic achievement and social-emotional skills is due to the additional support, the curriculum and intervention, or both.

NHSA supports the Department of Education's dedication in helping all at-risk students achieve success in school and we thank you again for the chance to share our comments. If you have any questions, you can contact me at yvinci@nhsa.org.

Sincerely,

A handwritten signature in cursive script that reads "Yamin Visci".

Executive Director
National Head Start Association