



NATIONAL HEAD START ASSOCIATION

February 22, 2013

Department of Education
Office of Elementary and Secondary Education
Re: ED-2012-OESE-0033

To whom it may concern:

Thank you for providing the opportunity to submit comments regarding “Proposed Priorities, Requirements, Definitions, and Section Criteria—Enhanced Assessment Instruments” (Federal Register Volume 78, Number 17 (January 25, 2013)). The proposed rules create an opportunity for states to better meet the individualized needs of young children, a goal we strongly support.

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. 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.

As the invitation to comment requests clear identification of the priority, requirement, definition or selection criterion addressed by each comment, our responses are so organized.

Priority 1

NHSA strongly supports the Department of Education’s intent that a Kindergarten Entry Assessment (KEA) be only one component of an early learning system including standards and assessment systems that address not only early literacy and numeracy skills by all the domains of early childhood development. At kindergarten entry, children’s developmental stages can be quite varied due to early environment, previous learning experiences, and individual characteristics, yet all children are capable of and excited by learning. Consideration of a whole child and his or her strengths and weaknesses allows teachers to think broadly about individualization and intervention in the classroom. Ideal assessments capture that whole picture of a child’s learning profile.

We recommend that the Department of Education encourage careful consideration of using assessment findings to make decisions about early childhood investments prior to kindergarten. Early experiences for many young children who are living in poverty, who are homeless, who are living in foster care, or who are facing other life stresses may pose obstacles to their healthy brain development and their response to intervention. These factors are not measured by any single assessment yet must be considered when judging the impact of early learning programs.

We commend the Department of Education for noting that assessments must be appropriate for children who disabilities or who are English Language Learners. Among children served by Head Start and Early Head Start, more than a quarter do not speak English at home, and the trend toward increasing ELL

1651 Prince Street, Alexandria, VA 22314
Tel: (703) 739-0875 - Fax: (703) 739-0878 - www.nhsa.org

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.

populations is reflected across the early childhood population. We recommend that attention be paid to developing infrastructure in states both for assessment and trained assessors in all children's home languages.

As noted in the proposal, KEAs should never be used to deny access to kindergarten or as punitive or high-stakes measures for individuals, for staff, or for programs statewide.

Priority 2

NHSA recognizes that the Department of Education's priority for KEAs created collaboratively by consortia of states will ensure broad stakeholder contributions to the development of KEAs and better analysis of data garnered from these assessments over time, though we recommend that this priority be carefully balanced against the quality of proposed assessments.

In designing applications in line with this priority, NHSA suggests the DoE require involvement of state Early Learning Advisory Councils (ELACs), mandated by the Head Start Act of 2007, in the development of both grant applications and Kindergarten Entry Assessments. These Councils are composed of stakeholders from across the early learning field, who bring deep expertise in areas not necessarily familiar to policy makers from the K-12 education community. While some research and practice from the elementary grades may be relevant to creating kindergarten assessments, pushing those practices down to younger children would not be developmentally appropriate, and any conversations about creation of instruments for young children must include experts on early childhood development.

Thank you again for the chance to share our comments. It is our hope that grant funds administered for the design and implementation of Kindergarten Entry Assessments will support teachers and schools in providing high-quality, individualized instruction in all domains of child development for every student. If you have any questions, you can contact me at yvinci@nhsa.org.

Sincerely,



Executive Director
National Head Start Association