

NCES Response to Public Comments Received Regarding the State of Preschool Survey 2013-2015 Data Collection

PUBLIC COMMENT 1 - Early Childhood Data Collaborative

Thank you for providing the opportunity to submit comments regarding the proposed collection “State of Preschool Survey 2013-2015” (Federal Register Volume 77, Number 241 (Friday, December 14, 2012) Pages 74471-74472).

The Early Childhood Data Collaborative (ECDC) is an organization committed to helping states develop coordinated early childhood data systems to inform planning and decision making. State and federal policymakers are increasingly focused on closing the achievement gap and preparing all students to succeed in school and in life. Research conducted on the NCES Early Childhood Longitudinal Birth Cohort found that disparities in learning can begin as early as nine months of age and become more pronounced at two years and the achievement gap can be greater for African American and Latino children.

Quality early education has been shown to help narrow the school readiness gap. Consistent data collection on preschool education opportunities in every state will help policymakers make informed decisions on improving access to high-quality early education opportunities, enhancing program effectiveness and ultimately improving child outcomes. While ECDC is not in a position to assert whether or not this data collection effort represents a proper function of the Department or provide specific recommendations, we offer our support for efforts such as the State Preschool Yearbook, published by the National Institute for Early Education Research (NIEER), for their focus on data quality and collaboration with states.

NIEER has demonstrated the value of an annual survey of key attributes of state preschool programs, including, for nine years publishing results through its State of Preschool Yearbooks, a widely-cited and well-respected publication. We strongly support NCES’s proposal to continue a State of Preschool Survey. Without standardized collection of pre-K data, journalists, policymakers, and parents would lack important context about children’s access to pre-K programs, how these programs are funded, policies on program quality, and trends over time. These data will contribute to better pre-K – and PreK-12 policymaking and planning within states, in Congress, throughout the Department of Education and the Administration as a whole.

In closing, we look forward to continuing to work with NCES, Departments of Education and Health and Human Services to strengthen the quality and use of data on young children, early learning programs and the early childhood workforce through state-led, and state-managed data systems. As states are moving to view early childhood as a continuum of learning and family partnership efforts there are multiple opportunities to connect and improve the usage of existing data from different state, federal and private sector early childhood initiatives, and to address gaps in our current early childhood data efforts.

Thank you for your consideration of our comments. If you have questions please contact me at egroginsky@childtrends.org.

Sincerely,

Elizabeth Groginsky
Executive Director of the ECDC

NCES RESPONSE TO COMMENT 1

We appreciate the support of Early Childhood Data Collaborative. To maximize information available to researchers and the public, NCES will work to integrate the data into on-line data access tools already developed by the department.

PUBLIC COMMENT 2 - American Federation of Teachers

In December of last year, the Department of Education (ED) announced that the Center for Education Statistics would be seeking approval to conduct the annual, web-based State of Preschool survey for 2013, 2014, and 2015 (the plan). The plan centralizes data about publicly provided early childhood education opportunities with a specific focus on enrollment counts and state funding levels as well as state program monitoring and licensing policies. On behalf of the 1.5 million members of the American Federation of Teachers (AFT), including nearly 90,000 early childhood educators, we are pleased to support the proposed plan.

The plan would contribute data from state funded early childhood programs and federally funded programs such as Head Start against the backdrop of U.S. Census data. Doing so will give a complete picture of the availability of publicly funded early childhood education. Such data collection provides a key resource for research and for federal and state early childhood education policy. The proposed plan also makes clear to state governments, local education agencies, families, early childhood educators and their communities that early childhood education is important and information about delivery, funding and staffing needs to be documented.

Again, the AFT applauds ED's efforts to ensure that research on early childhood education continues. We look forward to working with the department to support resources that will help generate the data necessary to understand and better sustain the delivery of high quality, public early childhood education and care.

Sincerely,

Marla Ucelli-Kashyap
Assistant to the President on Educational Issues

NCES RESPONSE TO COMMENT 2

We appreciate the support of the American Federation of Teachers on this important data collection and reporting project. We will work carefully and quickly to make the data readily available to the public and researchers to improve understanding of publicly supported early education and care across the United States.

PUBLIC COMMENT 3

The Massachusetts Department of Early Education and Care collects information on program capacity however, only collects attendance data on through monthly billing of children utilizing subsidy funds from the Child Care Development Block Grant. Information regarding enrollment of all children including child specific Head Start enrollment is currently not available and at this time would not accurately be able to be supplied to the Department of Education.

NCES RESPONSE TO COMMENT 3

We appreciate the clarifying note about data availability from Massachusetts. At the moment, the state does not capture detailed information about children enrolled in its publicly supported preschool programs. Because of this, age distributions of children in these programs are imputed. Head Start data are obtained directly from DHHS and do not require state reporting. For additional information about how data about Massachusetts are collected and reported, please see page 79 of the 2011 "State of Preschool Report" at <http://nieer.org/sites/nieer/files/2011yearbook.pdf>.

PUBLIC COMMENT 4 - Jenny Williams

Please consider collecting additional information regarding the availability of post-secondary educational programs available for preparation of teachers and support staff. Availability of preparation programs impact the quantity and quality of available staff. Staff retention data might also be helpful.

NCES RESPONSE TO COMMENT 4

Content development is ongoing in the data collection system that is part of this study, and measures of instructional staff training are a focus of the current questionnaire. Currently, data are collected about staff education requirements including requirements for staff to have specialized early childhood education training and regular in-service training. Consideration will be given to collecting additional information on the topic in future years as well as information about policies for staff retention.

PUBLIC COMMENT 5 - Jim Lesko, Delaware Department of Education

The establishment of a national early childhood data base would be a helpful structure. My recommendation would be to expand the survey to include children from ages of infancy through preschool. The previous NIEER survey was a helpful data source. Having only one comprehensive data survey would reduce the burden on states to constantly answer information requests.

NCES RESPONSE TO COMMENT 5

NCES agrees that maintaining the NIEER data collection structure would continue to provide much needed comparable information about early childhood education across the 50 states and District of Columbia while limiting burden on extremely busy state officials. Expanding the age range of the collection has been considered previously, and will be the focus of design decisions in future years, particularly as state data systems expand to collect information about younger children.

PUBLIC COMMENT 6 – New Jersey Department of Education

The Preschool Yearbook is an invaluable resource to our Department. We refer to publication throughout the year to learn from what other states are doing and to assess our own program relative to other states. We are also able to refer others to the Yearbook, thus lessening our burden to answer copious data requests. Perhaps most importantly, the very process of answering the Yearbook survey helps us to take a step back and evaluate our own programs in a way that we would not likely be able to do otherwise

NCES RESPONSE TO COMMENT 6

NCES agrees that maintaining the NIEER data collection structure would continue to provide much needed comparable information about early childhood education across the 50 states and the District of Columbia while limiting burden on extremely busy state officials. We appreciate that apart from providing much needed comparable information to the public in an efficient manner, we are also able to provide state officials with an opportunity to evaluate very important work related to early childhood education in their states. We look forward to continuing not only the collection, but working with states to regularly update the study's content to reflect a changing policy landscape.

PUBLIC COMMENT 7 – Lindy Buch, Michigan Department of Education/Office of Great Start

The State of Preschool Yearbook that is compiled from the survey is very helpful to administrators of state preschool programs, policymakers, and advocates. Although it does take some time to assemble the information in the required format, the researchers have been very thoughtful about reducing that burden and following up to make sure the data are accurate. It would be very hard to continue to improve the quality and accessibility of state preschool programs without this resource.

NCES RESPONSE TO COMMENT 7

NCES agrees that maintaining the data collection is important. We also appreciate the work that staff in state agencies put into compiling the needed information. Apart from providing much needed information about preschool education, the collection ultimately helps reduce response burden experienced by state officials by making the resulting data available to the public quickly and in one location, thereby limiting the number of data requests being submitted by third parties to each state agency. We look forward to working with Michigan to maintain the quality of this important resource.

PUBLIC COMMENT 8 - Mark DeSalvo, Utica School District

The collection of information on Preschool statistics is vitally important to understand one piece of the complex issues brought into the K-12 continuum and could potentially assist in the turnaround of failing inner-city school, by addressing issues earlier and applying appropriate interventions, before school-age.

Too much of the information is not shared with the K-12 public, and feedback is relegated to those in the know on how to gain access, and comment succinctly. Perhaps the University system could help locales collect and inform organizations, providing a necessary community service as a result?

NCES RESPONSE TO COMMENT 8

NCES recognizes the importance of providing information about children to educators and supports development of systems that include the necessary information through the Statewide Longitudinal Data System Grant Program funded through the U.S. Department of Education. As these data systems expand to include information about

children prior to kindergarten entry, valuable information will become available to local educators, including information that will allow direct links between previous preschool experiences and kindergarten success. The strength of this study, the State of Preschool collections, is making aggregate data about preschool education available to the public. The U.S. Department of Education recognizes the value of connecting the broader education world to early education and is exploring several options to expand outreach to broader audiences, including making data more accessible and usable for further analysis at the national and at individual state levels.

PUBLIC COMMENT 9 - Elizabeth G Flanagan, Norfolk City Public Schools

This Preschool Survey data is informative and very important to determine pre-K status by state and national level, advocate for pre-K, and conduct research on pre-K.

Data related to funding streams--how much are local districts contributing? Some cost/benefit analysis data, i.e. students retained in kindergarten.

A Kindergarten Survey like this preschool survey is also highly recommended, and may be even more important. It is not apparent to the public the fragmented funding streams for kindergarten across districts and states

NCES RESPONSE TO COMMENT 9

The data collection currently captures data about local contributions to overall preschool funding, but linkages between funding and later outcomes could be explored. This will become more feasible as states work to collect data about preschool children through state longitudinal data systems supported, in part, by the U.S. Department of Education's Statewide Longitudinal Data System Grant Program (SLDS). Expansion to include information about kindergarten funding may be possible and will be considered during design work associated with future years' collection. Though not specific to kindergarten, ED does collect and distribute information on funding sources for local schools districts. That information can be accessed through NCES' on-line ELSI tool at <http://nces.ed.gov/ccd/elsi/>.

PUBLIC COMMENT 10 - Lisa Guernsey, New America Foundation

February 12, 2013

Dear Sir or Madam,

Thank you for the opportunity to comment on the proposal for NCES to conduct the annual State of Preschool Survey for 2013-15. We commend NCES on this proposal. As an organization that focuses on improving early education and that has built a public resource based on data from the preschool survey, the New America Foundation sees this survey as critical to building a better understanding of education opportunities for our country's young children.

We would like to provide remarks on two of the five questions posed in the call for comments: Is this collection necessary to the proper functions of the Department? And how might the Department enhance the quality, utility, and clarity of the information to be collected?

Is this collection necessary to the proper functions of the Department?

The U.S. Department of Education, with leadership from Secretary Arne Duncan, has demonstrated a commitment to early learning in recent years by creating the first-ever Office of Early Learning within the Department and spearheading federal early education initiatives like the Race to the Top-Early Learning Challenge. In Duncan's own words, "[w]e have to get out of the catch-up business, and the best way to get out of the catch-up business and to level the playing field is to get our babies off to a great start...increase access to early childhood education – making sure it is high-quality and reaching children and communities historically underserved."

And yet, so far, little information is available through the federal government on how many children are enrolled in preschool, aside from Head Start. Fortunately, over the years, many states have invested in state-funded pre-K programs and are already collecting this data or are in a better position to do so than in past years. The National Institute for Early Education Research (NIEER) created the State of Preschool Survey to collect that data, and for nine years NIEER has been publishing results through its State of Preschool Yearbooks, providing a reliable annual study of the funding and quality of such programs across the country. One reason for our confidence in NIEER's survey is that it collects information on state-funded pre-K programs in *both school districts and community-based organizations*. If NCES contracts with NIEER to continue administering this survey (an approach that we think

February 28, 2013

Page | 4

makes sense), that comprehensiveness should be continued. Too often in the past, data on pre-K that are presented to the U.S. Department of Education only include school-based pre-K programs, providing an incomplete picture of how many children are served by publicly funded pre-K programs.

In short, we strongly support NCES's proposal to bring the State of Preschool Survey into its body of work on education data collection. Early education data shine a light on the disparities of access and quality that children face in their first years of development. Without standardized collection of pre-K data across the country, journalists, policymakers, and parents would lack important context about children's access to pre-K programs and how these programs are funded in comparison to K-12 education. These data are necessary to ensure better pre-K – and PreK-12 -- policymaking within Congress, throughout the Department of Education and throughout the Administration as a whole. The State of Preschool Survey will help provide essential data to answer these questions and measure progress in achieving the objectives over time.

Recommendations on enhancing the quality, utility, and clarity of the information to be collected

1. Begin collecting data on enrollment and funding at the local level

Currently, states struggle to provide good early education data at the school district level. We believe that a national task force or meeting of experts could help NCES change this. States need guidance on how to gather and report on enrollment in state-funded pre-K programs within the boundaries of their school districts. At the moment, this is very difficult to do because data from community-based organizations are not designed to mesh with data from school districts. Without a full picture of how many children are enrolled in publicly funded pre-K in their districts and what programs they attended, superintendents, principals, and early grade teachers lack valuable information about the students they are teaching.

2. Collect child, program and workforce level data

The Early Childhood Data Collaborative, another leader in the field of early education data, has proposed and advocated for the use of its 10 Fundamentals of Coordinated State Early Care and Education Data Systems. The New America Foundation believes those Fundamentals promote a deeper understanding of early learning systems and would recommend that several be incorporated into the State of Preschool Survey.

In particular, New America recommends that states, taking appropriate measures to guard child privacy, collect child-level demographic data and participation in early childhood programs; data on early education program sites and quality; and information on the early learning workforce by program. Additionally, the New America Foundation believes that the ability to link child-level data systems with K-12 and other systems is critical, and would propose that the survey collect information from states on current links between their pre-K data and their K-12 longitudinal data systems.

3. Make distinctions about dosage

For pre-kindergarten programs, dosage – the number of hours or days that a program is open to children – may act as a critical indicator of students' school readiness. Per-child funding cannot be calculated without an understanding of whether the data apply to a morning and afternoon class each day or to a full-day program. The data cannot be comparable across districts and states until dosage is included as a component of the collection process.

4. Include publicly funded early education opportunities for infants and toddlers

The New America Foundation recognizes that gaps in learning between students of different socioeconomic and demographic groups begin well before pre-kindergarten. Thus, collecting data on the enrollment of infants and toddlers in publicly funded early learning and home visiting programs, as well as the funding available for such programs, at the state and local levels are critical metrics for policymakers. Additionally, information on state policies for early education before pre-K provides essential information for researchers on the availability of those programs for needy families.

5. Open the survey to questions about kindergarten

On a related note, although K-12 funding is typically understood to mean that funding per student within a district is roughly equivalent for each grade, in reality, kindergarten funding may vary greatly. In some states or school districts, kindergarten is funded separately from first through twelfth grade. Additionally, dosage issues mean that kindergarten per-pupil funding may refer to either full-day or half-day programs, and therefore may not be directly comparable within and between school districts and states. Adding kindergarten data, including dosage, to the annual data collection process would help to unmask some of these serious disparities in funding and access to full-day kindergarten.

6. Incorporate the data into the Common Core of Data

Ensure that pre-K data can be downloadable within the National Center for Education Statistics' Common Core of Data. Enabling pre-K data to be part of the Common Core of Data would place early learning on a platform level with elementary and secondary education and offer data linked to other federal data on demographics, enrollment, spending and outcomes. However, we would also urge NCES to ensure the data collected remain comparable to prior NIEER data collections. NIEER is the only reliable, comparable source of pre-kindergarten data available across all fifty states. To lose its capacity as a data stream spanning nearly a decade would be an unfortunate loss for the early education community.

The New America Foundation thanks you for the opportunity to offer comments on the State of Preschool Survey 2013-2015. The preschool survey must continue – and collections of early childhood data need to expand in the coming years – to inform policymaking and spur the improvement of early education opportunities for all children.

*** About New America Foundation's use of the State of Preschool Survey**

Thorough, consistent data collection is essential to measuring the effectiveness and quality of early learning programs, and to promoting those practices. The New America Foundation's Early Education Initiative relies on NIEER's annual State of Preschool survey data to display many of the data points in its public Federal Education Budget Project (FEBP) database. FEBP is a centralized source of demographic, funding and outcomes data for every state, school district, and institution of higher education in the country. The New America Foundation's Early Education Initiative last year embarked on a project to collect and publish in FEBP data from all 50 states and Washington, D.C., on state-funded pre-kindergarten, Head Start programs, and early intervention services provided under IDEA Section 619. The data were collected at the state and school district levels. (To explore this database, see edbudgetproject.org)

However, the data proved challenging for states to provide, and the collection could not have been completed without the publication of the NIEER annual State of Preschool Yearbooks and the expertise of NIEER staff. The information NIEER provides to the public is authoritative and impeccably researched. Without it, we would be grasping in the dark to understand the variations in pre-K programs across state lines.

Furthermore, the very act of data collection through a standardized format encourages states to standardize the way they collect data and think about their early learning programs. This can help states to consider the full continuum of education, from birth through postsecondary education. It will also allow states to build a continuous educational infrastructure, including child and teacher assessments and data systems, that is more meaningful and reliable.

NCES RESPONSE TO COMMENT 10

We appreciate the New America Foundation's support for this collection and reporting project. As noted in the comments, the study plays a very important and productive role in understanding publicly supported preschool in this country. The rest of this response focuses on the six questions raised by the Foundation.

1. *Begin collecting data on enrollment and funding at the local level.* NCES RESPONSE – Collecting and sharing data about more granular geographic levels would be very useful. At the moment, such an undertaking is not part of the State of Preschool studies. Augmenting the collection in this manner would require a new design and data collection initiative well beyond the scope of this study. However, such data may become increasingly available as state longitudinal data systems that follow individual child development are extended below the kindergarten year.

2. *Collect child, program and workforce level data.* NCES RESPONSE – Again, more granular data would be useful, but collecting data at that level of disaggregation would expand the scope of this data collection effort in

ways that would require a different kind of data collection system. Such data are being incorporated into state longitudinal systems as they expand to include preschool children. Also, while some workforce information is already collected, collecting additional information will be evaluated.

3. *Make distinctions about dosage.* NCES RESPONSE – Recognizing the importance of “dosage,” NIEER has asked for several years about length of program day but has also taken recent efforts to standardize the terms used across states in defining schedules as state-level data has become more detailed. These efforts will be reflected in NIEER’s 2012 Yearbook (not yet published), and in the data collections continued under NCES.

4. *Include publicly funded early education opportunities for infants and toddlers.* NCES RESPONSE – Expanding the age range of the collection has been considered previously, and will be the focus of design decisions in future years.

5. *Open the survey to questions about kindergarten.* NCES RESPONSE – Expansion to include information about kindergarten funding may be possible and will be considered in the future during design work associated with each year’s collection.

6. *Incorporate the data into the Common Core of Data.* NCES RESPONSE – NCES intends to integrate the State of Preschool data into NCES on-line data tools as much as possible. If integrated into the CCD ELSI tools, state-level reporting would be possible.

PUBLIC COMMENT 11 - Brenda Ivie, Choctaw Nation of Oklahoma

Turning pre-school over to the states needs to be completely thought through before we jump into this. Public schools are terribly over-burdened now. Do you think that throwing some money at them will immediately fix all the problems they have now? I think not.

Universities are offering very few comprehensive classes to their students in the way of early childhood education. Teachers, who have never had a classroom full of 4 year old children, do not have the skills to deal with them. If the states are thinking clearly, they will, if this passes, look to entities already in place to administer any state-funded pre-school programs that result. The teachers are already trained, and educated, in what pre-school children need to be able to learn, and how to communicate effectively with their parents. Successful pre-school classrooms are there to be duplicated, Let’s take advantage of the opportunity to do well by the children, Think this through BEFORE jumping into this, The Nation’s children are too important to do things haphazardly.

NCES RESPONSE TO COMMENT 11

NCES agrees that it is imperative that our young children have access to effective and appropriate learning opportunities. The purpose of this study is not to change how preschool programs are structured or administered. The study will provide the public and policymakers with clear and accurate data about existing publicly provided preschool, information that is crucial to entities working to provide high-quality, accountable programs that model successful pre-K initiatives.

PUBLIC COMMENT 12 - Patricia Ewen, Hampshire Department of Education

The abstract indicates the State of Preschool survey is to centralize data about publicly provided ECE opportunities. Further, it states data is to be collected from state agencies focusing on enrollment counts in state-funded ECE programs. This data will be combined with Federally funded programs. This will provide the basis for rates developed State Preschool reports for publicly funded ECE.

The issue: New Hampshire, like so many states, does not have state funded Pre-K outside of Pre-K Special Education IDEA, part b. Because our legislature does not fund this opportunity, each year more of our local districts through publicly funded local tax dollars operate public preschools in public schools. Based on the abstract this funding stream is not counted and yet it provides a more accurate accounting of the State of Preschool on publicly funded ECE.

Is there a way to present the survey to include local communities funding public pre-K?

NCES RESPONSE TO COMMENT 12

It is important to capture data about publicly provided preschool through this study as many children are served in such settings, though expanding this effort would increase the scope of this project as well as the burden on state

and/or local officials to provide such data. As such, the issue of district-supported preschool and how such information might be best captured will be considered for future administrations of this survey.

PUBLIC COMMENT 13 - Jean Public, American citizen

I oppose gouging us taxpayers to pay for a preschool survey. The fact is we have immigration laws that mean all the sneaking illegal immigrants who sneak into this country for free schooling need to be picked up and shipped out of America. The cost to educate all these freebie leaches is bankrupting American taxpayers. There is no reason that America should be paying for all these sneaking lawless people sneak into this country to leach off American taxpayers. Our education costs have gone into the stratosphere since the USA let all these sneaks come into this country illegally. Deport them all and their kids. They do not belong in this country. We have a legal immigration system. That is the only way anyone should be getting into this country. I am sick of lousy corrupt politicians who choose which of our laws to enforce and which to let go. Our immigration system is completely damaged. We want the illegal lawless sneaks, criminals, druggies out of America. They are causing endless costs to American citizens. Our classrooms will be a lot smaller when we deport the sneaking leaches.

Comment was submitted again as follows.

R W. I AM OPPOSED TO THIS STUDY/SURVEY WHICH IS WASTEFUL. THESE NUMBERS OF STUDENTS CAN AND NEED TO BE ALTERED BY THOSE HERE ILLEGALLY BEING SENT BACK WITH THEIR PARENTS TO THEIR OWN COUNTRY. THE TAXPAYERS OF THIS COUNTRY ARE BEING STOLEN FROM TO PECAUSEAY FOR EDUCATION OF LAWLESS ILLEGAL SNEAKS. THEY FLOCK HERE TO LEACH ON AMRICAN TAXPAYERS AND ARE BANKRUPTING AMERICAN TAXPAEYRS WITH HIGH EDUCATION COSTS FOR KIDS WHO SHOULD NOT BE IN OUR SCHOOLS IN THE FIRST PLACE. THE FAILURE TO OBSERVE LEGALLY PASSED IMMIGRATION LAWS IS NOTHING BUT A STEALING SCHEME TO STEAL FROM AMERICAN TAXPAYERS. THOSE KIDS BELONG IN THEIR OWN COUNTRY NOT LEACHING ON AMERICAN CITIZENS. IT IS TIME TO START FINING THOSE WHO SNEAK INTO THIS COUNTRY AND TAKE BENEFITS THAT AR EPAID FOR BY AMERICAN CITIZENS. THESE SNEAKS FROM MEXICO/CHINA, ETC ARE NOTHING BUT COMMON UNLAWFUL THIEVES. THEY ARE CAUSING TAXES TO BE PAID FOR EDUCATION THAT ARE NOT THEIRS TO GET. THEY SNEAK IN HERE UNLAWFULLY. THEY ARE NOT GOOD CANDIDATES FOR CITIZENSHIP BECAUSE THEY ARE THIEVES. THEY BELONG IN JAIL IN AMERICA AND THEN DEPORTED. THEY SHOUDL HAVE FINES OF \$500,000 ON THEIR HEADS FOR SNEAKING INTO THIS COUNTRY. STOP STEALING FROM AMERICAN TAXPAYERS FOR EDUCATION YOU DONT DESERVE

NCES RESPONSE TO COMMENT 13

The U.S. Department of Education (The Department) received the comment above in which the commenter felt this study was a waste of taxpayer money. The Department disagrees; the importance of this study is described in section 1, 2, 4, and 6 of the Supporting Statement Part A that is part of the clearance package. Data collected and tabulated by NCES are used by policy makers at all levels of the educational system to help inform policy decisions and future planning. The purpose of this study is to provide the much needed information about publicly funded preschool in this country. While the study does contain information about cost, it is not a study of immigrants or immigration.

PUBLIC COMMENT 14 - Melody Hobson, Nebraska Department of Education

The State of Preschool, as currently published by NIEER, is a valuable document for some entities with interests in early childhood policy. However, the published State of Preschool document does not provide information useful to state agencies.

The NCES should make every effort to ensure that the scope of the State of Preschool survey is not enlarged or expanded. The current State of Preschool survey is cumbersome and requires a significant investment of time and effort on the part of state agency staff. The estimate of time needed to complete the survey is low. To minimize the burden on state agencies, the survey should be streamlined and all current topics should be reviewed before inclusion in the survey.

The current State of Preschool survey ranks states, in terms of resources used, and percentage of children served. While that may be a useful device to spur on early childhood advocates, it is not an appropriate role of federal government. The current State of Preschool report highlights state and local resources used for preschool programs. Federal ranking of states based on state and local expenditures is inappropriate, especially if connected with the allocation of federal funds. Finally, collection of information regarding state and local expenditures appears to be out of the scope of the federal government.

NCES RESPONSE TO COMMENT 14

We agree that the State of Preschool studies are valuable for those interested in early childhood policies. We understand that there is a burden imposed on states to report data for the data collection system and appreciate the effort state agencies make to provide the requested data. However, many state education agencies have noted the importance of having clear and accurate data for all 50 states and the District of Columbia in helping them make decisions about state preschool policy, including information about state and local financial support of early education.

Without the work done by state personnel, the data collection and report would not be possible. NIEER has reviewed the survey each year before releasing a new version to clarify unclear questions and to remove those for which data collection was deemed not useful as part of an ongoing streamlining process. Part of this process has included seeking input from state personnel. The burden estimate quoted in this submission was based on a range of burden reports provided by the 50 states and the District of Columbia. Burden estimation will be reevaluated for upcoming data collections in this series. Although the rankings published by NIEER were simple listings of states in order of the reported numbers, NCES (the agency that now oversees this study within ED) will not release reports based on these data that include rankings. Results will be reported by state in alphabetical order as is done with most NCES reports that include state level data. Direct policy recommendations will also not be included in reports developed and released by NCES from these data.

PUBLIC COMMENT 15 - Yasmina Vinci, National Head Start Association

Thank you for providing the opportunity to submit comments regarding the proposed collection “State of Preschool Survey 2013-2015” (Federal Register Volume 77, Number 241 (Friday, December 14, 2012) Pages 74471-74472). The State of Preschool Survey offers an important opportunity to better understand the range of state initiatives for early childhood education, especially as these initiatives expand and diversify.

The National Head Start Association (NHSA) 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 voice of more than a million children in Head Start and Early Head Start programs in the United States. Head Start represents 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 supports states’ intentions to develop high-quality early learning experiences for all children. Strong data systems are an integral part of quality early learning, and to that end NHSA supports the State of Preschool Survey to collect data about early learning programs’ quality and impact.

In response to the questions posed in the Federal Register, NHSA provides comments regarding the first and the fourth.

Is this collection necessary to the proper functions of the Department?

All learning in the K-12 and secondary education systems rests on development –cognitive, physical, and social/emotional – that occurs during the first five years of life. Ensuring appropriate, high-quality learning opportunities during these early years is an investment in children’s success in school and in life. Collecting data about children’s pre-kindergarten learning experiences would enable the Department of Education to better design K-12 systems and other policy initiatives that address the existing cradle to career experiences of children and encourage improvement.

How might the Department enhance the quality, utility and clarity of the information to be collected?

Quality

Quality data should be a priority in the design of this survey. We were pleased to see the breadth of questions addressing program design, parent engagement, teacher qualifications, and comprehensive services. In addition, NHSA recommends that queries address the following:

- Number of age-eligible children in the state

- Cost per child for various types and settings of early learning programs offered, including differentiated program and administrative costs
- Attendance/suspension rates for early learning programs
- Previous early childhood care and education experiences of children enrolled in state early learning programs
- State averages for CLASS and ECERS where these tools are implemented state-wide
- Status of integration of early learning systems with State Longitudinal Data Systems (including which subsets of early learning programs are integrated)

All of these factors reflect on the quality of state early learning efforts and will make more advanced understanding of data possible.

Utility

The data collected by the State of Preschool Survey has the highest utility only if it is quickly made public and is readily accessible for analysis. NHSA strongly recommends that the Department work to ensure timely and ready access.

Clarity

For nearly fifty years, Head Start has been a leader in the field of early learning, and today Head Start programs have varied partnerships and collaborations across all fifty states and numerous territories. We appreciate the survey questions that address whether state funding is braided into Head Start services at the state level. We also encourage that all reporting on survey data carefully articulate the role of Head Start as a partner in state and local systems and that when Survey data are shared alongside federal Head Start data sources, the overlap in children served be clearly articulated.

NCES RESPONSE TO COMMENT 15

We agree with the National Head Start Association regarding the utility of the study. We intend to release reports and data from the study in a timely manner to maximize access to the data. Several points were made about how the quality of the data might be improved. Currently, the number of age-eligible students in each state is collected from Census Bureau sources and is included in Appendix E of the State of Preschool annual report (<http://nieer.org/yearbook>), and is also used to calculate the percentage of age-eligible children served in each program and nationally. Capturing more detailed cost information will be challenging for the study, but will be explored in the future. Attendance rate information will also be studied for possible inclusion. Information about previous early education program experiences would be outside the scope of this study as it would require expansion of information collected by the providers about child specific characteristics. Collecting data on CLASS and ECERS scores would increase the burden on state education officials, but survey data does currently include documentation of any recent state evaluations, which would likely include that information. Lastly, information about what elements in the study are included in Statewide Longitudinal Data Systems can be included in future reports.

PUBLIC COMMENT 16 - National Association for the Education of Young Children (NAEYC)

Since the early 2000's, data on the number of children served by publicly-funded pre-k programs has been systematically collected and reported by the National Institute for Early Education Research (NIEER). These data are vital to the national dialogue on young children's access to, and participation in, pre-k programs. NAEYC supports the continued collection of these data under the auspices of the National Center for Education Statistics (NCES). We encourage the department to consider the following in collecting data on children's pre-k experiences:

1. Access and enrollments should consider all federal and state funding streams that support preschool.
2. Include age of children served (chronological age or commonly accepted age categories [e.g., infant and toddler, preschool]), home language, gender, race/ethnicity, and family income.
3. Data collected should be consistent with definitions used by other federal data collections, including CCD, and data collected by the US Census Bureau, to allow for linking.
4. Data collected should be consistent with non-federal entities that annually collect and report data related to early childhood education, including state licensing and monitoring standards, or collection of these data should be

incorporated into the data collection described here.

5. One hallmark of the NIEER yearbooks is the inclusion of 10 standards against which all states are compared. This review has provided a historical record of change nationally and within states in policies intended to drive quality programming. Collection of these data should be continued.

NAEYC recognizes the critical importance of these data. Certainly, there are many benefits to be gained by continuing to collect substantially the same data through the vehicle of data collection established by NIEER. At the same time, we encourage NCES to consider additional models of data collection, as well as integration of new and extant data, to ensure that these data meet the needs of the field.

NCES RESPONSE TO COMMENT 16

We agree that the study is valuable and appreciate the National Association for the Education of Young Children's comments. We also agree that additional information as recommended would be useful. However, some of the recommendations for expanding the information collected would significantly increase the scope of the study. Specific responses to recommendations follow.

1. The intent of the study is to capture information about all public support for preschool programs. As much information as possible is captured, and where limitations exist, they are noted in the resulting data and reports.
2. Expansion of child-level characteristics is not currently planned, as this kind of collection would require a much more extensive data collection process. However, such data will become increasingly available as states expand the age range of their student records through state longitudinal data systems supported, in part, by the U.S. Department of Education's Statewide Longitudinal Data System Grant Program (SLDS). Feasibility of collecting additional aggregate data from state administrative records at the preschool level will be evaluated and considered as state data systems continue to be developed.
3. Definitions of concepts used in the study will be evaluated for consistency with definitions used in other federal data collections so that possible discrepancies are clearly understood. Consistent definitions across federal studies are not always followed as the purposes of the different studies sometimes lead to intentional conceptual differences.
4. Data about monitoring and licensing standards for publicly supported preschool programs are collected through this study. Review of licensing and monitoring policies will be regularly undertaken to make sure the study reflects changes in policies related to these important issues that occur over time. Some data about licensing standards for child care programs is currently collected and included in Appendix C of the State Preschool Yearbooks.
5. NCES intends to continue collecting data necessary to evaluate standards, but reports released by NCES based on the data will not include ranking information or policy recommendations.

As mentioned above, review of licensing and monitoring policies as well as review of state administrative data availability will be regularly undertaken to maintain the utility of the collection and related report. We thank NAEYC again for its interest and input into this important study.

PUBLIC COMMENT 17 - Judy Freeman

I represent child advocates who are working hard to assure that education and the funding for education will begin at birth in the United States. This concurs with what we know about learning, brain research and wise investments.

We are celebrating today in Michigan as our Governor released his budget proposals yesterday which included an increase of funding for the state preschool program for at-risk 4 year olds.

We are working hard to help develop a system for Recruitment / Intake for all free preschools in our county which includes Head Start and the state preschools. We also oversee a scholarship program for 3 year olds who do not have access to quality learning. We are learning vast amounts about what parents know exist for their children. They don't know the difference between programs and how to navigate.

I am concerned about Federal regulations which seem to restrict Head Starts for collaborating for programming and cost efficiencies. We have many different Head Start affiliates in Michigan with such differences in quality. It seems that they also run independently as small school districts. Most Head Start agencies have their own fleet of buses, kitchen and food service, recruitment staff, program staff, etc for not very many children. Some free standing public schools have the same number of students. Think of how many more children we could serve if they would contract with local school districts for these services.

Our local Head Start agency has worked hard to build educational program to assist with kindergarten readiness. In spite of that, we have local school districts who do not wish to send their special needs children to them until they

have certified teachers.

Could the federal government help us work towards the same requirements and guidelines for state and federal run preschool services? We need whatever assistance you may lend to allow the maximum collaboration. Thanks so much for new requirements and we look for more

NCES RESPONSE TO COMMENT 17

We appreciate the challenges associated with finding good educational opportunities for at-risk children. The purpose of this study is to provide information about publicly provided preschools and will not be able to provide requirements or guidelines for preschool services. Other parts of the Department, such as the Office of Early Education and offices in other agencies, such as Health and Human Services' Child Care Bureau, that will have access to the findings of this study do engage in work to implement good practices across preschool programs. This study will provide valuable information to support the work of the many entities across the country that work to improve early childhood education.

PUBLIC COMMENT 18 - Chris Booth, University PreSchool

February 8, 2013

Please provide more information on the programs you wish to survey. You do realize that there are other programs besides federally funded preschools in all communities. Perhaps it would be best to send the surveys to all preschool programs that currently serve families?

NCES RESPONSE TO COMMENT 17

The purpose of the study is to collect data about publicly funded programs to provide information about these important investments to the public and to policymakers. We are very aware that there is a broader range of preschool education providers than those considered for this data collection, and we do undertake studies of them. However, given the nature of preschool education and the wide range of providers, collecting data from representative samples of them is cost prohibitive. Therefore, broader provider studies are conducted much less frequently.