



Hon. John B. King, Jr.  
Secretary  
U.S. Department of Education  
400 Maryland Avenue SW.  
Washington, DC 20202

May 25, 2016

RE: ESSA Guidance on Expanding Early Learning

Dear Secretary King:

Thank you requesting input on areas of the law on which to provide non-regulatory guidance to assist states, districts and other grantees in understanding and implementing the new law. The National Council of La Raza (NCLR)—the nation’s largest Latino civil rights and advocacy organization—respectfully submits these comments in response to the April 26, 2016 bulletin on ESSA guidance. NCLR has an affiliate network of nearly 300 community based organizations across the country, 80 of which provide early childhood education services that reach 59,000 children and families. Of these affiliates, 25 provide direct services through Head Start, Early Head Start and Migrant Head Start programs. NCLR respectfully submits these comments in response to 1) ways to expand early learning; and 2) strategies to recruit, develop, and retain teachers and leaders (Title II).

*Ways to Expand Early Learning*

First, NCLR, like many concerned organizations, recognizes that the current ECE system is characterized by fragmentation. There are different funding sources as well as various purposes, age ranges, requirements and monitoring systems. The system is fragmented and the fragmentation is a key reason for the various levels of program quality. Any expansion of early learning programs should be designed to minimize fragmentation.

Second, for decades, NCLR has drawn attention to another characteristic: the system is marked by inequality. In particular, Latino children are under-enrolled in federally funded ECE programs such as child care (CCDBG) and Head Start. In addition to a general level of lack of access nationally, there are severe and striking regional and state disparities that are simply unacceptable. For example, CLASP reports that only 1 % of eligible children in Mississippi are served in child care subsidized by CCDBG.

Therefore, increasing the numbers of children served in early childhood education is important - but should NOT be implemented without looking at “access” from an equity perspective. That is, *current* disparities in service access by racial and ethnic variables should be taken into account; targeted programs should be considered in order to redress existing disparities. Adding additional funds to an already unequal system may **actually increase** current disparities. Federal agencies and states should establish mechanisms to review available data, identify levels of disparity, and consider the use of targeted funded and programming to reduce and eventually eliminate instances of racial, ethnic and linguistic disparity.

Third, emphasize the importance of children’s home language(s) and culture(s) in any expansion of early learning. The central aim should be for programs to 1) recognize and respect diverse cultures and to bring cultural information into the classroom and the curriculum and 2) support the continued development of a child’s home language while facilitating the acquisition and development of English. The goal should be: support improved proficiency in both languages. Current research points to the importance of children’s home language proficiency for their acquisition of English as well as their school success. Children do not benefit by minimizing or eliminating their involvement with their home language (Genesee, in press). Instead, the continued development of proficiency in the home language is key to supporting the school success of children who are dual language learners (Collins, 2014; Hoff, 2014; Miller, et al., 2006; Prevoo et al., 2016).

Fourth, NCLR recommends the use of the Multicultural *Principles for Head Start Programs Serving Children Birth Through Five* by all federally funded ECE programming, and suggests that state-funded programs be urged to consider doing the same. Young children in the United States are highly diverse. According to Pew Research, the number of young dual language learners is large and will continue to grow for the next 50 years. Therefore, it is essential that *all* federally funded ECE programs be prepared to understand and to implement research-based policies and practices.

This includes creating and sustaining environments and family engagement practices that are culturally responsive and that seek to support the continued development of a child’s home language as their acquisition of English is also facilitated. Additionally, linguistically appropriate supports can set up DLLs for success to better transition into classrooms not- designed for English learners once they are ready to enter primary school.

Finally, states should be encouraged to develop and implement culturally responsive procedures to identify children who are dual language learners. These procedures should include information gathered from parents about children’s language experiences and could also include the use of screening instruments. If states do not have identification procedures in place, then the subsequent tasks of providing high quality early childhood education, such as appropriate screening and assessment and implementing developmentally appropriate curriculum have no foundation.

*Strategies to Recruit, Retain Teachers*

NCLR recommends pilot testing programs to recruit high school students from culturally and linguistically diverse backgrounds to create pathways to enter the field of early childhood education. Programs could provide students with an introduction to the ECE field during their last 2 years of high school, combined with some on-site experiences. Programs could also provide courses on child development and support for the development of proficiency on both English and the students' home language when possible. There is a strong need to develop an ECE workforce that is highly skilled AND that reflects the diversity of America's children and families.

NCLR hopes that the proposed guidance will help ECE programs continue to be successful in providing high-quality services to young children and their families. We applaud EDs efforts on behalf of DLL and Latino children, but we recognize more must be done to ensure the success of these young children. We thank you for considering our comments and look forward to working with ED as you continue to implement Every Student Succeeds Act. If you have questions please feel free to reach out to Robert Stechuk at [rstechuk@nclr.org](mailto:rstechuk@nclr.org) or Brenda Calderon, Policy Analyst at [bcalderon@nclr.org](mailto:bcalderon@nclr.org).

Thank you,

A handwritten signature in black ink, appearing to read 'Eric Rodriguez', with a stylized flourish at the end.

Eric Rodriguez  
Vice President  
Office of Research, Advocacy and Legislation

References

Collins, B. (2014). Dual language development of Latino children: Effect of instructional program type and the home and school language environment. *Early Childhood Research Quarterly*, 29, 389-397.

Genesee, F. (in press). Rethinking early childhood education for English language learners: The role of language.

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Preevoo, M. J. L., Malda, M., Mesman, J., & van IJzendoorn, M. H. (2016). Within- and cross-language relations between oral language proficiency and school outcomes in bilingual children with an immigrant background: A meta-analytical study. *Review of Educational Research, 86*, 237-276.