

National Association for the Education of Young Children

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The Honorable Arne Duncan
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

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

RE: Docket No.: ED-2014-ICCD-0073
Case Studies of the Implementation of Kindergarten Entry Assessments

Dear Secretary Duncan:

The National Association for the Education of Young Children (NAEYC), a leading voice on quality early childhood education for children from birth through age eight, is pleased to submit comments on the proposed case studies of kindergarten entry assessments (KEAs).

NAEYC expertise in assessment systems

NAEYC supports developmentally appropriate assessments of children in order to inform and improve teaching and services for young children. NAEYC's standards for accreditation of early childhood centers and schools includes standards on assessing young children. Our professional preparation standards also include standards on observing and assessing children. In conjunction with the National Association of Early Childhood Specialists in State Departments of Education, we adopted a Position Statement on Curriculum, Assessment, and Program Evaluation to guide states, localities, program providers and educators on the appropriate uses of assessments with young children. The basic guidelines around assessment of young children has been affirmed in the National Academy of Sciences report *Early Childhood Assessment: Why, What, and How*. With the rapid expansion of kindergarten entry assessments, in 2011 NAEYC produced a guide for states *Developing Kindergarten Readiness and Other Large-Scale Assessment Systems: Necessary Considerations in the Assessment of Young Children*. (Washington, DC: National Association for the Education of Young Children)

Timing and Context of State and Federal Policies Important To These Case Studies

The timing of this effort and the context of federal and state efforts is very important to the quality, clarity and utility of the case studies. State efforts to promote children's readiness for kindergarten have led to the development and implementation of kindergarten entry assessments (sometimes called readiness assessments). Twenty states have received Early Learning Challenge grants that include the development and implementation of KEAs that address all of the essential domains of school readiness. Last year, the Department awarded grants to two consortia of states and to an institution in Texas to develop kindergarten entry assessments. A majority of states have adopted the Common Core, will be using formative assessments in kindergarten for English language arts and math designed by PARCC or Smarter Balanced consortium, and are part of the World-Class Instructional Design and Assessment Consortium looking at English language development for dual language learners.

Although some states have received federal funding (and guidelines) in developing KEAs through Race to the Top and subsequent awards, not all state KEA development has been supported in this way. Even among states receiving federal funding, development and implementation of KEAs can vary from state to state. A February 2014 report from the Center on Enhancing Early Childhood Outcomes, *Fast Fact: Information and Resources on Developing State Policy on Kindergarten Entry Assessment (KEA)*, indicates the states and the variation in their experience in developing KEAs.

NAEYC recommendation: In selecting the states and school districts, it will be important for the Department to be clear about the policy context and degree of development and implementation of KEAs and other assessments used in the kindergarten year to provide a useful and clear picture of the system of assessment in kindergarten, including but not limited to the KEA. To be most useful, these case studies should attempt, as best as possible, to capture the greatest breadth of experience. As such, it may be more useful to conduct case studies in more states, even at the expense of fewer schools and/or districts within states.

The Quality, Utility, and Clarity of the Information to Be Collected

Kindergarten is a transitional year between the first five years of the early childhood span, where most children are nurtured and taught in non-school settings, and the elementary school system. The KEAs have the potential to support and improve curricula and instructional strategies in the kindergarten year, and to provide information about the knowledge, skills and developmental conditions of children as they transition from the preschool year to kindergarten. By focusing in multiple domains of child development, the KEAs provide a point of alignment between state early learning standards, which consider multiple domains of development for 4-year-olds in all states, and in the forward alignment of early childhood through elementary grades.

Given the breadth of use in states of KEAs to make policy and practice decisions in kindergarten and preschool programs, the information collection also should include child care, Head Start,

and school-based preschool providers within the geographic areas of the 12 selected school districts. While not always linked explicitly to early childhood program evaluation and improvement, the potential use of KEA to affect state policy and program practice in the years before kindergarten would be an important, unintended, aspect of KEA implementation.

NAEYC recommendation: The following items should be explored in the case studies to benefit policymakers as well as practitioners

At the state level:

- What is the process for the development of the KEA: how broad is the range of stakeholders in the process of developing the KEA or selecting assessments?
- What are the purposes of the KEA and how does the selection/development of the KEA match the purpose?
- How is the KEA part of a comprehensive system of assessment throughout the kindergarten year?
- What is the alignment between the domains addressed by the state's kindergarten standards and the domains addressed by the KEA?
- How is the information reported from the KEA to the state used to make state policy and resource decisions?
- What are the policies and supports for children who are dual language learners and children with disabilities to participate in the KEA?
- What other information is used at the state level to develop a comprehensive picture of how children are learning and developing in the state? How is this information used to make changes or create policies and investments to improve kindergarten and preschool?
- What are the resources being used (new and re-directed federal, state and private funds) for the development and implementation?
- How is the information from the KEA shared across state agencies that address preschool programs and services (including child care and Head Start), with schools and teachers, and with families?

At the school district and school level:

- What is the professional development provided to school leaders and regarding the purpose, administration and utilization to improve instruction in the kindergarten year?
- How are teachers supported in using a comprehensive assessment system, including the KEA, in improving instruction and supports for children?
- What other information is used at the district and school levels to develop a comprehensive picture of how children are learning and developing in the state? How is this information used to make changes or create policies and investments to improve kindergarten teaching and learning?
- If the kindergarten curricula is determined by the district or school, how is it aligned to all domains of learning and development in the KEA?
- Is the kindergarten program a half-day or full-day program?

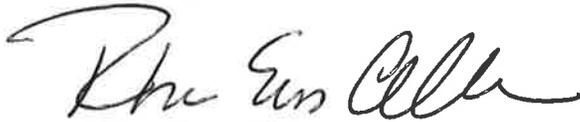
- How does the district and school inform families about the purposes of the KEA, how it will be administered, and how families will be able to help support their children learn and develop in the kindergarten year?
- What is the relationship between the district and schools and community preschool providers? (For example, transition plan for children and families, joint professional development, etc.)

At the early childhood program level (directors of community programs such as child care and Head Start):

- What communications have you had with local public school, school district, or state administrators about the KEA?
- To what extent, if any, have you made changes to the curricula and instructional assessments used in the program as a result of the KEA?
- To what extent, if any have you made changes to professional development for yourself, teachers and other school staff as a result of the KEA?

NAEYC looks forward to learning more about these case studies and would be pleased to provide more comments and recommendations as the Department designs these case studies.

Sincerely,

A handwritten signature in black ink, appearing to read "Rhian Evans Allvin". The signature is fluid and cursive, with a large initial "R" and "E".

Rhian Evans Allvin
Executive Director