## February 26, 2014

Deborah S. Delisle, Assistant Secretary for Elementary and Secondary Education Steven Hicks, Special Assistant on Early Learning in the Office of Early Learning Office of Elementary and Secondary Education U.S. Department of Education 400 Maryland Avenue, SW Washington, D.C. 20202

Re: Comments on prospective guidelines and priorities for Race to the Top preschool competition – taking school diversity into account<sup>1</sup>

Dear Assistant Secretary Delisle and Special Assistant Hicks:

We applaud the Department's commitment to early childhood education and welcome the opportunity to comment on the new \$250 million "Competition to Build and Develop and Expand High-quality Preschool Programs," pursuant to P.L. 113-76. While we support the program's stated goal of ensuring universal access to high-quality early education programs for all children from low- and moderate-income families, we urge caution in the development of the program guidelines, to avoid the unintended consequence of encouraging states, LEAs and providers to set up separate, segregated pre-K programs solely for low-income children. It is especially critical for the Department, consistent with its Title VI responsibilities, to avoid pre-K systems that isolate poor African American and Latino children in segregated buildings and programs, separate from their middle class and white peers.

Instead, we encourage the Department to create and develop, wherever feasible, mechanisms and program incentives that promote racial and economic diversity in quality pre-K settings. Specifically, we encourage the Department to include "promoting diversity" as a strong and overarching priority for this program, consistent with the Department's commitment to "promoting diversity" in its list of proposed priorities for discretionary grant programs.<sup>2</sup> The Department should also consider how it is structuring the program, to avoid encouraging segregative outcomes.<sup>3</sup> Likewise, the Department can craft a number of creative strategies in the guidelines to encourage integration of low income children into existing middle class early education programs, including nearby school-based programs that may be in different neighborhoods or school districts.

Avoiding racial and economic segregation is critical to quality early learning and development. However, recent research has shown that children of kindergarten and pre-kindergarten age are the most segregated age group in America, both racially and economically, in an analysis across

<sup>&</sup>lt;sup>1</sup> These comments amplify comments submitted through the online portal on February 26, 2014.

<sup>&</sup>lt;sup>2</sup> Guidance most recently updated at 76 Fed. Reg. 27637 (May 12, 2011).

<sup>&</sup>lt;sup>3</sup> Just as one example, the statutory admonition for LEAs and providers to work together does not require providers to only work with one LEA, or for LEAs to only work with providers in their jurisdiction. Encouraging providers and LEAs to work across existing segregated boundaries will lead to greater diversity.

384 metropolitan areas.<sup>4</sup> Therefore, addressing racial and socio-economic segregation and encouraging diversity are critical components to quality early learning opportunities, and we encourage the Department to incorporate and promote diversity in its program guidance for this competitive grant program.

The benefits of racial and economic diversity in early learning are well-documented. For example, a recent empirical study by Dr. Jeanne Reid indicates socioeconomic diversity in early education settings promotes early childhood learning. Reid's work has revealed a "positive association between the average socio-economic status (SES) of children in a preschool classroom and their receptive language, expressive language, and math learning, regardless of their own SES and the racial/ethnic composition of the class. Her research "suggests that policy measures to alter the SES composition of children's classrooms could prevent the gap in skills and knowledge between high- and low-SES children from widening during the pre-K year."

Further, interaction with a diverse group of peers is central to quality pre-K development. According to Reid's research, "[t]he socioeconomic compositional effect appears to operate through direct peer interactions, not instructional quality or other aspects of quality in preschools classrooms." This means that segregated high-poverty settings will not be able to produce the same learning advantages associated with higher-SES learning environments. Reid's research – although focused on a specific cohort of very young children – is nonetheless consistent with decades of research demonstrating the benefits of racially and economically integrated education. 8

Thank you for your consideration of these comments, and we welcome the opportunity to meet to further explore how to encourage racially and economically integrated preschool opportunities through this new funding program.

<sup>&</sup>lt;sup>4</sup> Jargowsky, Paul A., "Segregation, Neighborhoods, and Schools," in Annette Lareau and Kimberly Goyette, eds., *Choosing Homes, Choosing Schools: Residential Segregation and the Search for a Good School.* New York: Russell Sage Foundation (2014), at pp. 111-114.

<sup>&</sup>lt;sup>5</sup> Jeanne L. Reid, "Socioeconomic diversity and early learning: the missing link in policy for high-quality preschools," in *The Future of School Integration: Socioeconomic Diversity as an Education Reform Strategy,* Richard Kahlenberg, Ed. (The Century Foundation Press, 2012), at p. 69. Reid further notes that "[a]s the average SES of the class increased, children learned more during the pre-K year, and this relationship did not depend on whether children in the classroom were from high-, middle-, or low- SES backgrounds. Id.

<sup>&</sup>lt;sup>6</sup> Id.

 $<sup>^7</sup>$  Id

<sup>&</sup>lt;sup>8</sup> See generally, research compiled by the National Coalition on School Diversity, at www.school-diversity.org.

## Sincerely,

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