

National Association for the Education of Young Children

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Dr. Linda K. Smith
Deputy Assistant Secretary and Inter-Departmental Liaison for Early Childhood Development
Administration for Children and Families
U.S. Department of Health and Human Services
370 L'Enfant Promenade, S.W.
Washington, DC 20447

Dear Dr. Smith:

On behalf of the National Association for the Education of Young Children (NAEYC), I am pleased to submit recommendations for the Funding Opportunity Announcement for the Early Head Start-Child Care Partnerships grants. In the short term, these grants provide a tangible opportunity for states and communities to enhance access in diverse, high quality settings for infants and toddlers. In the long term, we are one step closer to our goal of eliminating what is currently a significant opportunity gap for young children starting kindergarten.

Our comments reflect conversations we have had with child care and Early Head Start providers and state systems administrators on ways to maximize this opportunity of new funds, while recognizing the complexity of partnerships between different providers typically accountable to different standards and systems.

1. It is essential that the grant funds awarded to a partnership cover the increased administrative costs, staffing costs, comprehensive services, training, materials upgrade, as well as cost per child to ensure that all of the partners are well-resourced to meet high quality standards. In order to attract and retain high quality child care staff, the grant should include compensation improvement and professional development resources for staff in family child care and center-based child care working with infants and toddlers.
2. We recommend flexibility in the number of children that a partnership services. In addition to different numbers of eligible children in urban, suburban and rural areas, the availability of child care partners will also vary. The goal should be partnerships that increase the quality of child care, provide high quality comprehensive child development and learning services to eligible infants and toddlers and their families, and strong community coordination around child development services.
3. We recommend prioritizing or providing more points for partnership with child care providers who have received NAEYC or NAFCC accreditation. Providers who successfully go through and

attain accreditation have shown a commitment to higher quality than their state demands of them and are closely aligned to existing Early Head Start requirements for quality.

4. In order to achieve a strong early childhood continuum of services for families and maximize resources, additional points should be given to groups of providers who have demonstrated partnerships with other early childhood service providers (e.g., IDEA Part C and section 619, home visitation, and state-funded prekindergarten partnerships).
5. The Early Head Start grantee should provide the child care provider the full fee per child slot. We urge that the amount also include compensation improvement, as well as the cost of high quality service delivery. The contractual agreement between the partners should ensure the timely and accurate payment of the child care provider.
6. In a center, it is important to provide professional development to all teachers and staff to ensure continuous quality improvement. To the extent possible, teachers of children from birth through age 3 in a center should be able to participate in training, coaching, and mentoring provided by the partnership dollars, regardless of whether they work directly with some of the Early Head Start-eligible children. This will facilitate higher quality mixed income classrooms, which in turn will support children's development and peer learning.
7. There should be some flexibility in terms of the ramp-up and planning for meeting some of the Early Head Start standards. For example, the Head Start Act of 2007 requires Early Head Start teachers to have a Child Development Associate (CDA) credential as a baseline. As a partnership begins its work, it may take more than 18 months for staff to complete a CDA. We recommend that if certain standards are not met, that the partnership indicates how it will make progress to meet the standards within a short extension of time.
8. To the extent possible, the new dollars should be flexible to permit serving Early Head Start eligible and above-income eligibility in the same space. For the partnerships, it would be financially detrimental to providers to segregate Early Head Start eligible babies and toddlers in their family child care or center setting. While the children eligible for Early Head Start services must receive priority for those comprehensive supports, children in mixed-income classrooms should not be segregated by the Early Head Start standards and their teachers and aides should not be segregated in their professional development. Further, a blended classroom is optimal for children's development.
9. Each contract will need to reflect the specific partnership. However, there are some elements that should be required in a contract. The contract should ensure that the administrative and training costs of all parties are considered within the grant. Funds from in the grant designated for professional development of teachers must include reimbursement to the child care provider for transportation of the teacher to another site for training, release time from work, and substitute teachers. The child care provider must remain in compliance with child care licensing and group size regulations. The child care director will need additional time to administer aspects of the partnership that fall on the child care provider and may need

additional staff to implement the contractual responsibilities. Likewise, the Early Head Start grantee will have responsibilities that need to be detailed and reflected in the resource allocation. The contract should clearly lay out the timely payment to the child care provider for the delivery of services to the child, how the resources will be used on all aspects of the partnership, and on the delivery of services by the child care provider.

10. Continuity of service is important to young children's development and to families' ability to have stable jobs. To the extent feasible, states should be encouraged to have once-a-year determination of child care subsidy eligibility to support continuity of care and services to these children. Termination clauses in partnership contracts need to protect consistency of care for children and families in addition to other considerations between the contracting parties. Notice must be given, not only to the Early Head Start grantee and the child care provider, but also to families, along with a transition plan to ensure that children and families are not dropped from services.
11. Some of the Early Head Start standards are not as appropriate for serving three year old children. The Early Head Start standards were designed for children up to 36 months of age. Ratios and group size in child care centers in these partnerships should reflect the Head Start or national accreditation recommendations.
12. The contractual relationships between the Early Head Start and child care providers will be the key to successful outcomes of these partnerships. We recommend that the Administration for Children and Families provides guidance and examples of current successful partnerships contractual considerations for effective administration, channels of communication, and delivery of services among the partners and any intermediaries.

NAEYC looks forward to providing comments on the Funding Opportunity Announcement draft and to working with the early childhood field to implement these partnerships and improve the quality of infant and toddler child care.

Sincerely,



Rhian Evans Allvin
Executive Director

Cc:

Shannon Rudisill, Director, Office of Child Care
Ann Linehan, Acting Director, Office of Head Start