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RIN 1855–AA06
Investing in Innovation

November 9, 2009

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

Dear Secretary Duncan:

The signing organizations are dedicated to improving the quality of early childhood education and to increasing access for young children to high quality programs in every setting. Many community-based providers of early childhood education and school districts are working together to provide services to young children, to enhance alignment of standards, curricula and instructional assessments, to participate in joint professional development, and to strengthen transitions. We are pleased that local educational agencies in partnership with nonprofit organizations can apply for the Investing in Innovation grants (hereafter "Innovation" grants) which will strengthen those relationships and help improve services regardless of the setting that prepare young children for kindergarten and for success in the early grades.

Comments on Effect Size

The Federal Register notice requests comments on proposed definitions, selection criteria, and whether the U.S. Department of Education should specify a minimum effect size and if so, what it should be.

There should not be a single effect size for all of the strategies, practices and programs that are funded under the Innovation grants. Researchers have long cautioned against comparing effect sizes across studies with varying scope, methodologies, and goals. There are several well-grounded reasons for this caution. By nature of its design, research that examines narrow goals (for example, letter recognition, phonemic awareness, or counting) tends to find larger effects sizes than research examining effects on broader domains (for example, overall literacy, vocabulary, comprehension, and mathematics). Thus, comparing effect sizes across studies of programs using very different outcome measures or seeking to influence different domains would be inappropriate. In addition, most programs, especially programs going to scale, are not going to produce large effect sizes on child outcomes unless the outcome measures are well-aligned with the program. The effect size for scaling up a full program to serve young children is different than the effect size of scaling up a curricular or professional development model. Another issue is that some educational outcomes are measured with more precision than others and measurement error can attenuate effect sizes. Lastly, effect sizes may vary according to context and population of interest. Effect sizes for one population should not be directly

compared to effect sizes for another. Similarly, effect sizes should be expected to be much larger in a study of a program when the control group receives no program or other comparable experiences than when a study compares a new intervention or approach to an existing program or when the control group has some access to similar experiences through some other means.

If effect sizes are required, we strongly recommend that (1) there is no single minimum effect size cut-off for funding decisions, and (2) reviewers are provided with clear guidelines on how to interpret, compare, and evaluate effect sizes appropriately according to context and domain. They also should understand: (1) the level of effort and resources that have been required to produce substantial effects on broad domains of learning and development and (2) that even effect sizes in the range of .10 can have substantial benefits (i.e., enough to justify spending $5,000 to $10,000 per child) for high value outcomes.

Definitions Related to Evidence

We agree with the Secretary that strong quasi-experimental studies should be included in the definition of "strong evidence." We caution against reducing that definition to include only randomized control trials. In addition, randomized trials do not preclude a variety of problems with internal and external validity, so that all randomized trials do not provide strong evidence. Among the problems observed: poor implementation of the treatment; failure to maintain the intended differences in experiences between treatment and control groups; highly selective admission to the trial so that neither treatment or control groups are representative of the intended recipients of the program when taken to scale; differential attrition between treatment and control groups; and conducting the pre-test after the treatment group has had extensive exposure to the treatment.

Evaluating Cost-Effectiveness of a Project

The Federal Register seeks comments on criteria for evaluating the cost-effectiveness of a proposed practice, strategy or program. Studies need to carefully distinguish the resources needed for research and evaluation purposes, for supporting infrastructure and development, and for the operation of particular programs, approaches, and innovations. One-time costs need to be distinguished from ongoing costs. When programs are brought to scale these may be very different on a per-child basis. Some new infrastructure may need to be created to support an expansion or replication. The amount of additional costs depends on the innovations, and program changes may not add any additional costs beyond training and development because they replace existing programs or approaches that have their own costs. To correctly estimate costs, studies must clearly identify the resources required to implement an intervention or program and whether this is an addition or a replacement (and in this case identify the resource requirements for the activities displaced). Detailed resource cost model data will be necessary to compare cost-effectiveness across projects.

Comments on the Competitive Priority for Early Childhood

We are pleased that the Department includes early childhood as a priority for the Innovation Fund. We recommend that this become a separate Absolute Priority. As written in the Federal Notice, the priority would provide grants for practices, strategies or programs to improve

educational outcomes for high-need students who are young children (birth through 3rd grade) by enhancing the quality of early learning programs. Proposals must focus on (a) improving young children's school readiness (including social, emotional, and cognitive) so that children are prepared for success in core academic subjects; (b) improving and aligning developmental milestones and standards with appropriate outcome measures; and (c) improving alignment, collaboration, and transitions between early learning programs that serve children from birth to age three, in preschools, and in kindergarten through third grade.

The priority requires an applicant to meet three areas: improving school readiness in young children, improving the alignment of standards with measures; and improving collaboration and transitions among the early childhood continuum of birth through age 8. We respectfully suggest that the "and" become an "or." The first part – (a) – reads as a grant for a program for young children whereas (b) and (c) seem to focus on structural issues such as alignment, transitions and collaborations but which may not include direct services to children. Thus, it would be very limiting for the Department to require that all three components be met by a single grant. Some practices and strategies will focus at the district level on alignment of early learning standards, curriculum, and assessments for instructional improvement as well as transitions and professional collaborations between community-based providers and schools and between settings and professionals serving different ages of children. The purpose is to create a foundation for programs and schools to support better child outcomes and readiness for school, but the grant may not provide services to young children directly (the "a" of the priority).

We request that the language be modified as follows for the competitive priority for the three types of Innovation grants:

(a) Improving young children's school readiness (including social, emotional, physical and cognitive development and approaches to learning) so that they are better prepared for kindergarten and have the foundations for success in the early grades; or

(b) Improving and aligning early learning standards with developmentally, culturally and linguistically appropriate curricula and assessments for improving instruction (horizontal alignment) in all types of settings working with children from birth through third grade; or

(c) Improving within the local educational agency's geographic area the collaboration among community-based providers of early childhood education programs and schools to enhance developmentally appropriate, progressive alignment of standards, curriculum, assessments to improve instruction and special needs services, transitions, and joint professional development for those providers and schools working with children from birth through third grade (vertical alignment).

Comments on Scaling Up in a Cost-Effective Manner

Strictly speaking, cost-effectiveness comparisons can only be made across programs that measure the same outcomes. Otherwise implicit, and preferably explicit, valuation of outcomes must be made to compare economic efficiency across programs. The earlier a program starts, the more problematic this becomes because of the long chain that links early learning and

development to later school success, workforce productivity, mental health, and social behavior. Nevertheless, there is a substantial body of knowledge making these links, and even estimating the economic value of the impacts of intensive programs for young, low-income children such as the Abecedarian program, Chicago Child Parent Centers, and Perry Preschool program, as well as for Head Start. These long-term benefits range from decreases in child mortality to lower rates of special education placements and grade repetition, to the prevention of teen pregnancy, depression, and school dropout, lower crime rates, and increased employment and earnings. However, it should be asked whether a burden should be placed on those proposing early childhood-focused efforts to produce similar estimates for programs where outcomes are primarily measured during the early years of life. While it may be possible to develop ballpark figures for the long-term value of these effects, there is likely to be a great deal of variation when this is done by each project and little real comparability because of inconsistencies in procedures and assumptions. We suggest that the Department develop an approach to evaluating "cost-effectiveness" that is not biased toward the later years by the types of data available or unduly affected by optimistic projections applied to results from the early years.

The Federal Register notice asks the applicant or others to reach 100,000, 250,000 or 500,000 students with Development grants and Validation Grants; and to reach 100,000 to one million students for Scale-up grants. These numbers are problematic for the competitive priority for early childhood where programs operate on a smaller scale and the numbers of young children served within a reasonable radius may be considerably smaller than is the case for older children, and we urge you not to reject applications with more intensive, comprehensive approaches to provide high-quality learning from birth through third grade for fewer children.

We welcome the opportunity to discuss these and other issues with you.

Sincerely,

Center for Law & Social Policy
Early Care & Education Consortium
First Five Years Fund
National Association for the Education of Young Children
National Association of Early Childhood Specialists in State Departments of Education
National Black Child Development Institute
National Head Start Association
National Institute for Early Education Research
National Women's Law Center
Pre-K Now
ZERO TO THREE