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June 26, 2003

The Honorable Michael N. Castle
Subcommittee on Education Reform
U.S. House of Representatives
Washington, DC 20515

Dear Chairman Castle:

On behalf of the Council of Chief State School Officers, representing the nation's state superintendents and commissioners of education, I am writing to commend you for improving the *School Readiness Act of 2003* during the committee process. After the first hearing on the bill, we wrote to you with our recommendations for the legislation. In response, you attended a forum with our members to hear their concerns in person and begin a dialogue on possible improvements. We are delighted to see that you have taken those views into consideration and insisted upon higher standards in the state demonstration program. We urge members of the House to support the legislation and vote for final passage.

We are pleased that H.R. 2210 maintains the current comprehensive approach to Head Start while at the same time providing a strengthened focus on school readiness. We applaud the School Readiness Act for establishing a uniform state planning mechanism that would insist upon greater collaboration at every level of the Head Start program. We also appreciate that H.R. 2210 ensures early childhood educational programs are aligned to the standards of No Child Left Behind. If children enter kindergarten with the appropriate skills, it will be easier to make progress on the goals of NCLB.

As we work to improve the quality of early childhood education, no reform will realize greater results than raising degree and certification expectations. We are encouraged by the bill's emphasis on higher teacher qualifications and professional development, and we applaud the decision to establish minimum degree requirements. The members of our organization are also pleased by the proposal for a state demonstration program in the new Title II of Head Start. By empowering each state to reform their Head Start programs, we will be assured greater consistency among programs and the cost benefit of a statewide system.

Unfortunately, the demonstration program has been unfairly criticized as a "block grant" that would dismantle Head Start. These accusations are not consistent with the substance of HR 2210, nor are they consistent with congressional intent. Neither Congress nor the

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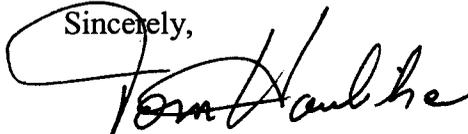
states want to dismantle Head Start or eliminate its critical components. During committee markup of HR 2210, a number of new protections were added to the bill to ensure that the comprehensive services of Head Start are maintained under the new demonstration program. We applaud you for listening to the concerns of the Head Start community and working to ensure the bill does not create a block grant. In particular, States must have standards for school readiness and comprehensive services that "generally meet or exceed" the federal Head Start performance standards and the child outcomes framework. Similarly, teacher qualification must meet or exceed Head Start standards. There are stringent policies to ensure that states do not decrease their early childhood expenditures. There can be no question that the demonstration program in the School Readiness Act demands higher standards of both states and Head Start centers than required in current law.

As the bill moves to conference with the Senate, we have several recommendations. First, the bill must be authorized with sufficient funding to provide adequate teacher compensation and training. We recommend that the authorization level be substantially increased to help states meet the new teacher qualification standards. Second, because of the heightened focus on school readiness, we recommend that the state education agency be given a "right of first refusal" to act as the lead agency. State constitutions deliberately vest authority for education programs in SEAs. Although governors will decide whether or not to participate in the demonstration program, once that decision is made, SEAs should be given the first option to be the lead agency.

Additionally, we ask that the conference committee include assurances that the reauthorization will not result in a single national assessment. Although H.R. 2210 does not address assessments, a National Reporting System is being developed under current authorization. Each state should have the flexibility to create its own accountability system and should be given the option to use its own assessment. One of the benefits of the H.R. 2210 is that it would result in greater alignment between early childhood services and K-12 educational standards. Since those educational standards are different in each state, we cannot expect a single national test to adequately assess progress against state standards. Finally, we recommend the hold harmless provision in the state demonstration program be restricted to local grantees meeting all new standards and requirements imposed by the act. We do not want the hold harmless to inadvertently protect local grantees that are not meeting the requirements of the School Readiness Act.

Again, thank you for your work on this important issue. The School Readiness Act of 2003 is an excellent opportunity for states and Head Start programs to leverage reform and improve services. We look forward to working with you as the reauthorization process continues.

Sincerely,



G. Thomas Houlihan
Executive Director