



Memorandum

To: The Honorable Arne Duncan, Secretary of Education
U.S. Department of Education

From: Marci Young, Project Director, Pre-K Now
Pew Center on the States

Kathy Patterson, Senior Officer for Government Relations
Pew Center on the States

Re: Invest in Innovation Fund (I3)
Docket # ED-2009-OII-0012

Date: November 5, 2009

We appreciate the opportunity to comment on behalf of Pre-K Now, a campaign of the Pew Center on the States, on the “priorities, requirements definitions, and selection criteria” published in the Federal Register for the Investing in Innovation Fund. Our comments and recommendations are in the context of the commitment made by President Obama and Secretary Duncan to secure high-quality pre-kindergarten as an opportunity for all American children to improve the quality of their lives and bring a guaranteed return on public investments.

We recommend that what is drafted as “Competitive Preference Priority 5 – Innovations for Improving Early Learning Outcomes” be rewritten as “Absolute Priority 5 – Innovations for Improving Early Learning Outcomes.” Without this level of priority, innovations in early learning that are showing remarkable results in closing the achievement gap will not be able to apply for “scale-up” funding to serve more children unless they also address one of the four “assurances” that are included in the guidance as absolute priorities.

The Investing in Innovation Fund was designed to enable “entities that have made significant gains in closing the achievement gap” to “expand their work...serve as models for best practices...and identify and document best practices than can be taken to scale based on demonstrated success,” according to Congressional report language. We certainly agree that effective teachers and leaders, improved use of data, high standards and quality assessments, and turning around persistently low-performing schools are important elements of improving

schools and closing the achievement gap. Important though each assurance is, none equals the level of proof available today of the efficacy of high-quality pre-kindergarten. **High-quality pre-k is the most rigorously researched option for closing the achievement gap, and it should be included on par with the other absolute priorities.**

Applicants, therefore, should have the option to focus their grant proposals directly on practices, strategies or programs that improve early learning outcomes and expand access to high-quality pre-kindergarten, particularly for children from low and moderate-income families.

Our second recommendation: explicitly identify implementing a high-quality early learning program as a school turn-around strategy within Absolute Priority 4, Innovations That Turn Around Persistently Low-Performing Schools. To date no other intervention has been proven as successful in improving achievement as has high-quality pre-k linked to intensive early literacy and language development. We therefore recommend that the targeted approach to reform included in Absolute Priority 4 include a new section, “designing and expanding high-quality pre-k-3rd grade early education programs, including intensive early language and literacy instruction.”

We thank you for your consideration of these comments and recommendations and look forward to working with you to make the president’s commitments to the nation’s youngest learners a reality.