



The National Association for Regulatory Administration (NARA licensing) commends the Administration for its commitment to assuring the school and life success of the Nation's youngest citizens and we wholly support the Race to the Top – Early Learning Challenge (RTT-ELC). We are particularly pleased and concur with the comprehensive emphasis you have placed on strong licensing as the foundation of quality.

Reflected in the systems approach taken here in the Early Learning Challenge, the Administration has incorporated strengthening regulations, monitoring and inspection capacity as essential parts of all its major initiatives for child care. This intentional and comprehensive approach starts with strong licensing and is reflected throughout the efforts of the Administration for Children and Families. This approach is included in the visionary Pathways to Excellence for Child Care, the new state biennial planning requirements and tools, and the Office of Child Care's plans for FY 2012 technical assistance. And now, strengthening licensing systems is stated as an explicit goal within this worthy and ambitious plan for state early childhood systems initiatives in the RTT-ELC.

We are eager to partner with you and with states to realize this vision, and provide our comments to support the effort:

(A)(3) Organizing and aligning the early learning and development system to achieve success

Eligibility – we suggest that any comprehensive plan have the demonstrated involvement of the states licensing director, and explicitly includes the licensing system (including where a state's licensing system is a sub-part or component of larger agencies that are partnering in the submission).

(A)(4) Building or enhancing an early learning data system to improve instruction, practices, services, and policies

The state data system should be intentionally connected to state licensing data. States should show how their data plans for program sites will incorporate licensing information.

(B)(1) Developing and using statewide, high-quality Early Learning and Development Standards

When the elements and characteristics of the state licensing rules are of the requisite quality they will promote early learning and development. States should demonstrate alignment of licensing systems with their early learning frameworks.

(B)(4) Identifying and addressing the health, behavioral, and developmental needs of High-Need Children to improve school readiness –

The key focus of licensing regimes in state is considered to secure the health and safety and safety of children in care, but the RTT-ELC presents a significant opportunity for states to show how their rules and regulations also enhance and support the behavioral, developmental and learning needs, particularly for High Need children.

(C)(1) Developing and adopting a common, statewide set of tiered Program Standards

The quality of the licensing requirements for states forms the baseline for rating, monitoring and improving programs that are already in the system. Strengthening the licensing system will also lift the QRIS.

In addition, just as all children should have access to the highest quality programs, we believe that all programs should aspire to the highest quality rating. We suggest that a strong state submission should include an incremental and realizable plan for how non-licensed and license exempt programs will be incorporated into an uncompromised licensing system.

(C)(4) Validating the effectiveness of the State Tiered Quality Rating and Improvement System in improving school readiness

Include tools and measures used for licensing systems and licensing inter-rater-reliability within the validating process.

(D)(1) Developing Workforce Knowledge and Competencies and a progression of credentials

States should include and plan for professional development of state agency personnel and line-staff – including managers, directors and inspectors -- participating in the systems initiatives under this grant.

Definitions

We suggest including licensing staff within the definition of Early Childhood Educator.

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