February 6, 2018

Office of Head Start
Attn: Colleen Rathgeb
Director, Division of Planning, Oversight and Policy
330 C Street SW Washington, D.C. 20024
Re: RIN 0970-AC63

Dear Ms. Rathgeb,

Thank you for the opportunity to submit comments on the proposed changes to the CLASS Condition in Head Start's Designation Renewal System (DRS). Teachstone is the leading global authority on measuring and improving teacher-child interactions, a key quality indicator of classrooms. As the organization responsible for overseeing and administering the training, certification, and professional development supports of the CLASS tool, we are driven by our mission to create a lasting, positive impact on children's development and academic performance by accurately observing, measuring, and improving teacher-child interactions.

We appreciate the Administration's recognition of the importance of maintaining the use of the CLASS with its singular predictive validity in determining child outcomes and applaud the Administration's goals, aligned with ours, of improving the implementation and transparency of the DRS. As a laboratory of innovation for quality improvement, Head Start has helped transform the definition of high-quality early childhood education by focusing and investing in teacher practice and selecting a validated measure of teacher-child interactions as part of program monitoring. While the CLASS does not measure everything, the best programs have solid teacher-child interactions as a foundation to support other quality features, such as research-based curricula. In fact, it appears the focus on these critically important interactions is paying off. The data from the 2017 grantee average CLASS scores demonstrate continued increases in grantees' domain level scores with a 6.07 in Emotional Support, a 5.83 in Classroom Organization, and a 3 in Instructional Support, scores that significantly exceed the current Head Start minimum thresholds. It is worth noting the scores in Emotional Support and Classroom Organization are also higher than widely accepted research thresholds.[1]

With the completion of the initial five-year DRS period, it is appropriate to review the use of the CLASS and strengthen its implementation. Whether it is in a research study or in a public accountability system, such as the DRS, implementation is the key determinant for results. We take this very seriously at Teachstone and work to ensure all trainings and services are delivered with the quality needed to make them work.

Adoption of a Research-Based Tool

As part of the reauthorization of the Head Start Act in 2007, Congress required the Secretary of the Department of Health and Human Services (DHHS) to use a "valid and reliable research-based observational instrument, implemented by qualified individuals with demonstrated reliability, that assesses classroom quality, including assessing multiple dimensions of teacher-child interactions that are linked to positive child development and later achievement" to monitor programs. At the time this was adopted, Head Start was perceived as having little accountability for producing child outcomes, and those both inside and outside of government were calling for child assessments to determine program quality. Fortunately, the Act's requirement of a valid and reliable observational instrument to assess teacher-child interactions, and the subsequent adoption of the CLASS, allowed for an effective proxy for child outcomes which can be difficult to measure fairly and appropriately with young children.

Overview of the Research

A vast body of research demonstrates that teacher-child interactions, as measured by the CLASS, significantly impact students' social, emotional, and cognitive development. The validity of the CLASS as a measure of instructional quality has been supported by studies involving thousands of classrooms and tens of thousands of students across age levels, from infancy through secondary school. This research confirms that each domain of the CLASS is associated with academic growth. For example, Emotional Support in preschool is linked to oral language, receptive and expressive vocabularies, early reading outcomes, and math achievement. Similarly, effective Classroom Organization in preschool leads to improved academic outcomes, including language and literacy skills, early writing skills, listening comprehension, and tests of early numeracy, while Classroom Organization in K-3 settings is linked to gains in reading for students. Higher levels of Instructional Support are associated with language and literacy skills for preschoolers and lead to improved vocabulary and letter-word knowledge in kindergarten.

Teachstone recently published a summary of over 150 peer-reviewed, published studies conducted in Pre-K and K-3 classrooms in the United States by both the authors of the CLASS and outside researchers.[2] These studies confirm that children who attend classrooms that score more highly on the CLASS have better social and academic outcomes than their peers who attend classrooms that are characterized by lower levels of effective interactions. Research demonstrates this applies equally to children from varying backgrounds in native language, culture, and race/ethnicity. Research conducted in programs serving Dual Language Learners (DLLs), indicates that the psychometric properties of the CLASS function equally well in classrooms with a large number of DLLs versus classrooms with no DLL students.[3] Other research suggests that the three domains of the Pre-K CLASS predict to child outcomes for students who are DLL.[4,5] A study examining the use of CLASS in American Indian Head Start programs showed that scores for the tribal classrooms were similar to those in a large national data set. However, the authors identify several considerations for using CLASS in AIAN programs, including being aware of cultural variations in behavior, understanding when it is appropriate to code, and knowing the languages being used in the classroom.[6]

Furthermore, research conducted in middle and secondary schools shows that teachers who participated in MyTeachingPartner™ (MTP™) CLASS-based coaching significantly decreased their discipline referrals for black students.[7] In addition, students in classrooms with stronger teacher-student interactions had higher scores on end-of-the-year achievement tests.[8] Likewise, a growing body of research shows that international use of the CLASS is multiplying with over 40 countries using it, including countries with very different cultures such as China[9] and Ecuador, where research using the CLASS shows children learn significantly more in classrooms with teachers who have higher CLASS scores (and the effects seem to persist even after children leave their classroom).[10]

Recommendations to Improve Implementation

Even with a strong research foundation, implementation matters: the integrity of the data we collect is based on the fidelity and quality of implementation. As discussed in our response to the *Early Implementation of the Head Start Designation Renewal System: Volume I & II* (the "DRS evaluation study") in November 2016, that study itself highlights some of the challenges and limitations from differences in implementation. Most importantly, issues of inconsistency including timing of the observations, small sample size, and differences in ongoing support for observers raises questions about the comparison and generalizability of the data collected.

Although there are many factors that contribute to challenges in using a measure like the CLASS, including the timing and number of observations, none is more important than the way in which observers are trained and supported to maintain high rates of reliability in scoring.

Accordingly, Teachstone has carefully developed a system of support for OHS observers following their training and certification, including elements highly recommended for consistency among observers, fidelity to the observation protocol, and reliability with the CLASS manual and master coders, including

- Periodic video calibration;
- Group support for ongoing content review and relevant coding challenges;
- Double-coding with expert Teachstone coders requiring a higher reliability level; and
- On-demand observer support via email or phone.

While this system works well, we are committed to strengthening the support to and oversight of OHS observers to ensure the original goal of the DRS is met: to ensure all Head Start children have access to high-quality classrooms. As the training and certifying body for CLASS observers, we are committed to reviewing our reliability data and using it to determine how best to improve the system of training and support of observers and ensure higher reliability rates. In that vein, as first steps, we recommend OHS consider

- Increasing the reliability threshold for OHS observers;
- Requiring more calibration of OHS observers at specific points during the observation window and requiring a higher reliability rate on calibrations; and
- Requiring double-coding for a specific percentage of observations with a higher co-agreement threshold.

Additionally, steps should be taken to improve the overall implementation of the CLASS in both monitoring and DRS, including

- Include a pre-observation survey to ensure an observation is appropriate, e.g. not a substitute teacher, observer speaks the language used in the classroom, teachers understand the CLASS and sign-off on understanding the observation procedures, etc.;
- Pilot video observations as a validation of live observers;
- Include training on cultural and linguistic awareness and understanding, developed in collaboration with experts from organizations such as the Tribal Early Childhood Research Center, National Indian Head Start Association, and the National Migrant and Seasonal Head Start Association, to support OHS observers in gathering reliable and valid data on the quality of classroom interactions in distinct populations, as culturally-based verbal and non-verbal behaviors in classrooms serving distinct populations may impact the quality of observations;
- Increase guidance for observing classrooms with children who are dual language learners, children with special needs, and/or children in AIAN and Migrant-Seasonal programs;
- Increase and strengthen communication with grantee staff and require evidence of communication with teaching staff, in particular, about how and why classroom observations will occur; and
- Implement an appeals process if inconsistencies or changes are made to the protocol during a monitoring review and noted by administrators and/or teaching staff.

We are proud the CLASS has been an integral part of the transformation of quality measurement and are unwavering in our commitment to improve its implementation in monitoring and the DRS to ensure all Head Start children are in classrooms that support their social, emotional, and cognitive development.

Feedback on the Proposed Changes to the CLASS Condition in DRS

As the Administration explores options for the CLASS condition to better balance an ability to drive quality improvement over time with an approach that would be more transparent, timely, and less burdensome for programs, we offer the following thoughts, developed in consultation with experts/developers of the CLASS tool, on the Administration's proposals and ideas for alternatives.

- **Change the minimum thresholds for the Emotional Support and Classroom Organization domains**

We fully support the Administration's proposal to raise the minimum thresholds as described in 45 CFR 1304.11(c)(1)(i) and (ii) for the Emotional Support domain from 4 to 5 and for the Classroom Organization domain from 3 to 5.

A score of 4 in the Emotional Support domain indicates that either there is some evidence that children are experiencing the types of interactions that lead them to feel safe and secure in their environments – or that there are times when the Emotional Support in the classroom is strong, but there are also times when it is low. For example, teachers may spend some time in close proximity with the children, joining in their play, but at other times, may be preoccupied with other tasks. Similarly, teachers may frequently notice and provide help when children have problems completing a task, but may miss times when children are having social difficulties. Given that young children thrive on consistency, a fluctuation in the amount of Emotional Support they experience can be problematic. Increasing the Emotional Support score to 5 would help ensure classrooms are providing a more uniform and higher level of Emotional Support, which has been related to academic outcomes and social competence in preschool.[11]

Increasing the minimum threshold from 3 to 5 in Classroom Organization would encourage programs to support teachers to improve the ways they help children develop skills to regulate their behavior, get the most out of each school day, and maintain interest in learning activities. A score of 3 in this domain suggests that behavioral expectations are neither entirely clear, nor consistently enforced. This score also suggests that children often have nothing to do, and instruction, when provided, may not fully interest the children, thereby interfering with their ability to learn. A score of 5 implies that for the most part, children are more likely to understand and comply with classroom rules, follow routines, and display higher levels of interest in things that are happening in the classroom – things that benefit children's social-emotional and academic outcomes. In a classroom with a score of 3, we may see many children running around and not paying attention to the teacher's instructions. Furthermore, the teacher's reaction to this behavior may consist of statements such as, "Stop that," or "You know better than to behave that way!" In contrast, in a classroom with a Classroom Organization score of 5, the observer would likely see that the majority of the children are complying with the teacher's expectations, and when they aren't, the teacher may subtly redirect by moving in close physical proximity or saying something such as, "Let's remember our classroom agreements."

- **Change the minimum threshold for the Instructional Support domain**

We also are supportive of changing the Instructional Support domain threshold, but we do not support the Administration's proposal to provide authority for the Secretary to set an absolute minimum threshold for the Instructional Support domain, considering the most recent CLASS data, by August 1 of each year to

be used for CLASS Reviews conducted in the following fiscal year (October 1 through September 30). Instead, for several reasons explained below, we recommend setting a minimum threshold of 2, below which a grantee must submit a quality improvement plan and demonstrate improvement at a CLASS reassessment midway through the five-year grant period. Grantees receiving a score between 2.1 and 3.20 will be required to submit a quality improvement plan and be reassessed near the end of the grant. This continuous quality improvement approach is more fully described below under "Recommended CLASS Conditions."

To explain, a low range score below 2 suggests that the children are rarely, if ever, exposed to the types of interactions that promote higher order thinking and language development. In a classroom with low Instructional Support, the children are unlikely to be participating in discussions or questions that help them develop analysis and reasoning skills, the feedback is probably rote in nature, e.g. "That's exactly right," and they have limited opportunities to hear and practice using language. The score of 2 indicates that there is something happening - it is not that the classroom is totally devoid of interactions in this domain. However, the few interactions that do occur are not sufficient to enhance development. While a score of 3.25 does not mean that children are in an environment that does a stellar job of promoting cognitive development and language, it does mean that the children are occasionally exposed to interactions that lead to growth in these areas. For example, a teacher may do a picture walk of a book, ask the children to predict what the book will be about, but then only ask factual questions as she reads to them. On rare occasions, the teacher may ask children to explain their actions ("Why did you decide to put a mustache on your snowman?"). Other times she may simply comment on what she sees ("I see you painted your fish in rainbow colors") but not ask what led them to do that. These less frequent interactions are important for children because they push them to think at a deeper level. They are also key for teachers because they confirm that children are capable of doing more than the teacher may have thought, but also help teachers see how they can embed Instructional Support interactions, leading them to become more intentional in their provision of these key experiences.

The quality improvement threshold for Instructional Support, and the ensuing quality improvement plan, are explained below.

- **Remove the bottom 10% requirement of the CLASS condition and develop a plan for quality improvement for lower scoring grantees**

We applaud the Administration's response to concerns about the implementation of the CLASS in DRS, including the minimal difference between programs in the bottom 10% and those meeting thresholds shown to support and improve child outcomes, particularly in the Emotional Support and Classroom Organization domains. Additionally, the bottom 10% trigger set an ever-changing threshold making it difficult to plan and focus on specific areas of weakness. This also meant that programs were held to a different threshold each year, as it was based on those grantees being monitored in any given year. Lastly, it caused a long delay in determining which grantees were identified for the DRS, as the results of the review year and calculation of the bottom 10% occurred the next year.

While we support the Administration's proposal to remove the bottom 10% requirement, we urge the Administration to adopt a system which supports continuous quality improvement for grantees below specific thresholds. The recommended replacement would apply to all three domains and would include three conditions: recompetition, quality improvement, and high quality.

Recommended CLASS Conditions

CLASS Domain	Recompetition	Quality Improvement	High Quality
Emotional Support	Must be above 4.0 or recompetition	Between 4.10-4.99 requires a quality improvement plan	5.0 or higher
Classroom Org.	Must be above 4.0 or recompetition	Between 4.10-4.99 requires a quality improvement plan	5.0 or higher
Instructional Support	Must be above 2 or recompetition	Between 2.10-3.20 requires a quality improvement plan	3.25 or higher

All grantees would be reviewed early in the five-year grant period and fall into one of three conditions. At the highest level, High Quality, grantees receiving a score above 5 in Emotional Support, 5 in Classroom Organization, and 3.25 in Instructional Support would continue with their established, current professional development plans and not be required to take further action.

At the lowest level, Recompetition, grantees receiving scores below the minimum score of 4 in Emotional Support, 4 in Classroom Organization, and 2 in Instructional Support would submit quality improvement plans and engage in professional development focused on improving teacher-child interactions. Then, at a CLASS reassessment midway through the five-year grant, the grantees would need to show improvement in any domain in which they had initially scored below the minimum. If they improved, then, at the end of the grant period, the grantees in this level would be reassessed a third and final time to determine if they had moved into High Quality. If so, they would no longer be in recompetion. However, if they did not show improvement at the interim CLASS observation nor score in the High Quality at the end of the grant period, then they would be recompeted.

In the middle level, Quality Improvement, grantees with scores between 4.10 to 4.99 in Emotional Support, 4.10 to 4.99 in Classroom Organization, and 2.1 to 3.20 in Instructional Support would be required to submit a quality improvement plan and engage in focused professional development to improve teacher-child interactions. At the end of the grant, following this period of quality improvement, grantees would be reassessed and only grantees without improvement into High Quality would be recompeted. This adoption of the quality improvement plan would address the frustration reported by grantees about the lack of opportunity to engage in professional development to immediately address the need for improved CLASS scores following a monitoring review.

A number of research studies have shown that sustained CLASS-based professional development leads to improvement in the effectiveness of teacher-child interactions, leading to higher CLASS scores. For example, one study showed that participation in a 14-week course on effective interactions resulted in improvement in scores in both Emotional and Instructional Support[12], while another study showed that teachers who took a very similar course had significantly higher scores in Emotional Support and Classroom Organization.[13] Research confirms that sustained professional development leads to greater growth in CLASS scores. For example, a study involving 170 preschool teachers found that teachers who completed between 11 -15 coaching cycles made the greatest gains in classroom interactions in Instructional support.[14] Similarly, findings from California's Comprehensive Approaches to Raising Educational Standards (CARES) Plus program revealed that teachers who completed 6-10 coaching

cycles made far fewer gains than teachers who completed more cycles; those teachers who completed 16 or more cycles demonstrated nearly three times as much growth in Instructional Support as teachers who completed the lower number of cycles.[15]

Precedence for this quality improvement approach was established in February 2013, when Teachstone was awarded a contract to coach 200 teachers in 39 American Indian and Alaskan Native (AIAN) grantees. Data, as well as grantee and teacher feedback from this project, suggest this professional development, when implementation challenges are overcome, can lead to improvements in teacher-child interactions.

- **Expert Advisory Panel**

While we recommend this three-tiered approach, we urge the Secretary of DHHS to appoint an advisory panel of experts, representative of stakeholders, to review Head Start's CLASS data and the thresholds research to ensure the adoption of optimal thresholds for child outcomes. The advisory panel also would provide a recommendation as to the timeline and process for reassessment of grantees in the Recompetition and Quality Improvement conditions, including consideration of the administrative burden/cost of conducting additional CLASS reviews and the possibility of using CLASS "self-assessment" for the initial, interim, and/or final assessments during the five-year grant period. CLASS self-assessment would be carefully defined as a CLASS observation conducted by trained, certified Pre-K CLASS observers and possibly require such observers to meet a higher reliability threshold. Teachstone is ready and willing to participate in such an advisory panel or provide assistance to the panel in an effort to systematically study and refine DRS for quality, transparency, and efficiency.

- **Infant and Toddler CLASS in Early Head Start**

Lastly, as OHS transitions to birth to five grants and programs focus on teacher-child interactions across the birth to five continuum, we recommend OHS consider the adoption of CLASS in Early Head Start, with the aligned infant and toddler versions. Teachstone supports the joint adoption of Infant and Toddler CLASS through the provision of infant-toddler combined trainings and professional development.

Accurately measuring classroom quality can be complex, and the key to accuracy is appropriate implementation. Head Start has improved significantly over the last five years, and we are proud to be part of that improvement. Yet, we hold a steadfast belief in a continuous quality improvement process, and in the spirit of Head Start, we will work with our partners to support stronger implementation of the CLASS. We offer our comments with that perspective and look forward to continuing to support and work with the Head Start community to improve quality by unlocking the potential of great teachers, boosting child outcomes, and creating a culture of sustained excellence. Thank you for your consideration.

Sincerely,

Amy Stephens Cubbage
Senior Advisor, Public Policy and Government Relations
Teachstone Training, LLC

Notes

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