

July 6, 2011

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

Subject: Race to the Top – Early Learning Challenge

Dear Secretary Duncan:

The National School Boards Association (NSBA), representing over 90,000 local school board members across the nation, is pleased to submit comments on the draft priorities and criteria for the Race to the Top Early Learning Challenge (RTT-ELC) program. NSBA has long recognized the benefits of high quality Pre-K and supports a voluntary role for local school districts. NSBA's 2011 Delegate Assembly established a national policy on this issue, that urges the federal government to grant flexibility to school districts to establish preschool programs for all three and four year olds through a separate funding stream, that develops, coordinates, and enhances the quality and availability of preschool programs. NSBA also supports pre-kindergarten-16 collaboration among the various sectors of education and with business, industry, and government to enhance teaching and learning opportunities so that all students are prepared to live in and contribute to a vibrant society.

In reviewing the draft criteria for the RTT-ELC grant, NSBA has identified provisions that could dramatically impact local school districts and undermine their effectiveness as providers of Pre-K services and as K-12 educators in those states that receive funds. Therefore, NSBA believes that it is crucial that these concerns be addressed in the final criteria. Key revisions include:

1. Incorporate local school district governance in the process of applying for and implementing RTT-ELC grants. Draft Performance Measures require state applicants to demonstrate commitment from a broad group of stakeholders and local communities through letters of support, MOUs, etc., but local education agencies (LEAs) are not mentioned. Of the many stakeholder categories identified in the draft (including state early childhood advisory councils, early childhood educators, education association leaders, family and community organizations and a broad range of early learning administrators and advocates) school district governance representatives such as school boards are absent. We note that state early childhood advisory councils are required to have an LEA representative as a member. However, it is critical that local school boards have a meaningful role in the application process and implementation of the grant given the potential and widespread impact on K-12 education. See #2 and #3 for further explanation.

2. Assure balanced representation of early childhood and K-12 participation in RTT-ELC grants. Invitational Priority 4 in the draft states that the Department of Education is particularly interested in state applications describing how the state plans to “sustain and build upon early learning outcomes throughout the early elementary years,” including how the state will 1) enhance current K-3 standards for all domains



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of school readiness, 2) ensure transition planning between early learning and the early grades, including family engagement, and 3) increase the percentage of children who are able to read and do mathematics at the end of third grade.

The potential statewide impact of this priority on local school districts is immense and calls for robust representation of local school boards in the application and implementation process. For states in the process of implementing Common Core State Standards for literacy and math, active involvement by LEAs is even more important to prevent duplicative and possible contradictory efforts.

3. Eliminate the requirement for re-directing existing education funds: Draft Performance Measures require state applications for RTT-ELC funding to provide a budget that demonstrates how resources will be repurposed or reallocated from other Federal, State, private and local sources, including Title I and IDEA. The wording of the section suggests that redirection of funds is mandatory. NSBA recommends maintaining flexibility for states and school districts with regard to federal education funds and opposes a mandate to repurpose or reallocate in order to qualify for the RTT-ELC grant. Programs such as Title I are already underfunded and these hard economic times have jeopardized local school district resources at the local, state and federal level. Repurposing education funds for the RTT-ELC grant could become a long-term, if not permanent obligation of funds to sustain the program when RTT-ELC funding has been spent. LEAs should not be put in the position of sacrificing services and programs for high need children in their districts as a result of a state's decision to apply for short-term, one-time funds.

The pivotal role of local school districts in children's achievement in school and in life means that the success of the RTT-ELC will depend on the involvement of K-12 providers and leaders. NSBA would be happy to provide additional suggestions to enhance the collaboration between local school districts and others to assure mutual success. Questions regarding our concerns may be directed to Lucy Gettman, director of federal programs at 703-838-6763; or by e-mail at lgettman@nsba.org.

Sincerely,



Michael A. Resnick
Associate Director