

November 19, 2010

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

Dear Secretary Duncan:

The National School Boards Association (NSBA), representing over 95,000 local school board members across the nation through our state school boards associations, is pleased to submit this statement regarding SEA and LEA Capacity and Support in the Striving Readers Comprehensive Literacy Program (SRCL). Local school districts, governed by school board members selected by and from the communities they serve, are well positioned to help implement the new program. Many school districts provide or collaborate on early learning experiences for preschool children and therefore bridge much of the birth to grade 12 continuum of the SRCL program.

NSBA applauds the Department's efforts so far to disseminate \$10 million in funds to states to establish or support State Literacy Leadership Teams. Broad knowledge and experience from diverse perspectives on state literacy leadership teams is vital to developing comprehensive statewide literacy plans to meet the needs of all learners.

The next crucial step is to assure that the remaining \$190 million in FY 2010 funding is disseminated to LEAs in a timely manner to provide instruction, professional development, assessments and other critical components of a comprehensive literacy plan. State and local capacity and support are essential to closing achievement gaps and raising student achievement. Therefore, NSBA's responses to the three questions on SEA and LEA capacity and support are as follows:

**Question 1** – Perhaps the most significant opportunity for State Literacy Plans is to bridge the child development and education continuum from birth to grade 12. The historical independence of early learning and K-12 systems is reflected in the structure of funding streams and oversight that at times undermines coordination, alignment and effectiveness. The SRCL program is a unique opportunity to build a bridge along the entire continuum in the area of literacy. To maximize impact of the program, it is imperative that states recognize all these elements in the plan.

One strategy to do so is to optimize expertise and opportunities available already in each state. For example, most states have or are establishing Early Childhood Advisory Councils (ECACs) authorized in the Head Start reauthorization to recommend improvements for the quality, availability, and coordination of services for children from birth to school entry. There is undoubtedly other expertise and capacity on other issues in each state. Collaboration where appropriate and possible on quality, standards, professional development, assessments and other shared interests can increase the impact and reach of all for the benefit of children.



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**Office of Advocacy**

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Associate  
Executive Director*

**Question 2** – The SRCL program can most effectively help SEAs and LEAs transition to Common Core State Standards (CCSS) by preserving the state and local role that led to voluntary development and adoption of the standards by most states. The standards provide a framework for assuring that all students are college and career ready, but ultimately it will be up to states and school districts to implement them. Further, implementation of SRCL must recognize that LEAs are subject to federal statutory accountability requirements - such as those in No Child Left Behind Act - during the transition to CCSS. Therefore, SRCL should maximize flexibility for school districts to determine local needs and implement effective strategies to address them.

**Question 3** – SEAs can play a significant role in leveraging the use of federal funds and resources under SRCL by deploying state set-aside funds for technical assistance, professional development, disseminating research, etc. on comprehensive literacy. States may also choose to review their state plans for ESEA and other federal funds for additional opportunities for coordination. However, it is imperative that LEAs retain flexibility and authority to determine how to utilize federal funds in also the most effective way.

In conclusion, local leadership from LEAs and early childhood is crucial to the success of the SRCL program. Other federal programs, such as Promise Neighborhoods and the White House Neighborhood Revitalization Initiative, fully recognize that community-based solutions are the key to success. The SRCL program is a welcome opportunity that could become a model for P – 12 collaboration in other areas.

Thank you for the opportunity to provide this statement. NSBA looks forward to an ongoing dialogue. Please call on us to assist in this vital work. Questions concerning our comments may be directed to Lucy Gettman, director, federal programs, at 703-838-6763; or by e-mail, [lgettman@nsba.org](mailto:lgettman@nsba.org).

Sincerely,



Michael A. Resnick  
Associate Executive Director

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