

June 19, 2013

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

The Honorable Kathleen Sebelius  
Secretary  
U.S. Department of HHS  
200 Independence Avenue SW  
Washington, D.C., 20201

**Re: *Race to the Top – Early Learning Challenge - Docket ID ED–2013–  
OESE-0046***

Dear Secretary Duncan and Secretary Sebelius:

The National School Boards Association (NSBA), representing over 90,000 local school board members across the nation, is pleased to submit comments on proposed, requirements, definitions, and selection criteria for the 2013 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 2013 Delegate Assembly established a national policy on this issue, urging 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 continues to support the intent of the RTT-ELC program to improve early learning and development for young children. We further support some of the proposed changes to the 2013 competition, such as changes to the budget categories to reduce maximum grant amounts in response to limited available funding.

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.

It is to this point that our recommendations are directed. Local educational agencies (LEAs) are essential in the P – 3 continuum of education and care – both as providers of early childhood and preschool services, and providers of educational and other services for all children at school entry. The prevalence of LEAs that either offer or collaborate with early learning programs, including infant and toddler programs under IDEA, necessitates a more formal and visible role for LEAs. Two thirds of children in publicly funded pre-K are in public school settings. Further, LEAs can provide an essential perspective in the areas of school readiness, assessments, teacher quality and effectiveness and interventions.

As such, NSBA has repeatedly urged the Departments to require significant LEA involvement in the development and implementation of state RTT-ELC applications - with limited success. In fact, local school boards have no role at all in the state application process, except as an optional source of letters of stakeholder support. We note that state early childhood advisory councils are required



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Executive Director*

to have an LEA representative as a member; however the indirect involvement such representatives have is dwarfed by the profound impact of RTT-ELC on every LEA in recipient states.

**Recommendation #1: Final priorities, requirements, definitions and selection criteria for 2013 RTT-ELC grants should require significant LEA involvement in the development of applications, and in implementation of successful state grants.**

For example, the Departments' proposed substantive revisions to *RTT-ELC Priority 4 – Creating Approaches to Sustain Improved Early Learning Outcomes through the Early Elementary Grades* – compel us once again to urge the Departments to require significant LEA involvement in the development and implementation of state RTT-ELC applications as they relate to sustaining and building upon early learning outcomes from preschool through third grade.

The direct impact of Priority 4 on K-3 education is embodied in the elements of the High Quality Plan that States would be required to provide for such activities as:

- a. Enhancing K-3 standards to align them with early childhood standards.
- b. Identifying and addressing the health, behavioral, and developmental needs of children from P – 3rd grade.
- c. Implementing teacher preparation and professional development programs.
- d. Implementing model programs of collaboration between early learning and K-3 schools.
- e. Building or enhancing data systems to monitor the percentage of children who meet 3<sup>rd</sup> grade reading and math standards, and
- f. Leveraging existing Federal, State and local resources, including Title I, II and IDEA funds.

Given the wide scope of these activities, and their impact on all school districts in a state regardless of whether they provide early childhood services, it is critical that local school boards have a significant role in the application process and implementation of RTT -ELC grants.

**Recommendation #2: Eliminate Title I, II, IDEA and other ESEA funds from (f) Leveraging existing Federal, State and local resources in High Quality State Plans.**

State leveraging of existing funds could have profound impact on local school districts, and become a mandate to rob-Peter-to-pay Paul. The Departments must recognize that local school boards are facing ten years of debilitating cuts in federal education funds as a result of sequestration in the Budget Control Act. LEAs have been overwhelmed in anticipation of budget cuts due to sequestration. In the first year alone the cuts exceed \$2 billion dollars in programs designed to help the most vulnerable students, such as Title I and special education. Therefore, any financial or operational impact from RTT-ELC grants – no matter how small or seemingly insignificant - will impact instruction, staff, or both at the local level.

NSBA supports a separate funding stream for new early childhood initiatives to avert the very dilemma proposed by Priority 4(f) – diverting or repurposing existing funds at the expense of current services. 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 RTT-ELC funds.

NSBA believes that it is crucial that these concerns be addressed in the final Notice. 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](mailto:lgettman@nsba.org).

Sincerely,

A handwritten signature in black ink that reads "Michael A. Resnick". The signature is written in a cursive, flowing style.

Michael A. Resnick  
Associate Executive Director