

March 16, 2012

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

Re: Early Learning Stakeholder Meeting on Race to the Top in FY12

Dear Secretary Duncan:

The National School Boards Association (NSBA), representing over 90,000 local school board members across the nation, is pleased to submit this written statement for the record of the February 16, 2012 Early Learning Stakeholder Meeting on Race to the Top in FY12. **Our comments support local education agency (LEA) eligibility to apply directly for FY 2012 Race to the Top Early Learning Challenge Funds (RTT-ELC).**

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 adopted a Resolution, that urges the federal government to grant flexibility to school districts to 1) establish preschool programs for all three and four year olds, 2) through a separate funding stream, 3) 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. NSBA's commitment to collaboration extends to establishing and leading the Pre-K Coalition, with support from the Pew Center for The States.

The RTT-ELC program embodies many of NSBA's priorities for a supportive federal role in pre-k education, which is why NSBA actively supported the Early Learning Challenge Fund in the House-passed version of the 2010 SAFRA bill (HR 3221).

At the same time, NSBA urges Congress and the Administration to increase availability of formula funds to states and school districts, rather than competitive grants, so that school districts have access to resources based on need rather than the capacity to compete for funds.

NSBA's commitment to pre-k education and support for resources to increase local school district capacity-building leads us to conclude that LEA eligibility to apply directly for \$549 million in FY 2012 Race to the Top funds - including Early Learning Challenge grants - will both strengthen the program and address the needs of high-need LEAs:

- **LEA direct eligibility for Early Learning Challenge grants will strengthen the program.** One of the objectives of the RTT-ELC is to sustain and build upon early learning outcomes throughout the early elementary years. Many states applying for RTT-ELC grants therefore reached out to their state school boards associations for letters and other forms of



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Executive Director

Ã Michael A. Resnick
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support. LEA access to RTT-ELC funds can produce the desired outcomes and create models, best practices and opportunities for replication in other school districts and states.

- **LEA direct eligibility for RTT-ELC grants creates a synergistic opportunity for the Department.** Targeted investments in LEAs in states already implementing Race to the Top and/or Early Learning Challenge grants can amplify and accelerate outcomes in districts and settings with the highest need and potential impact. Investments in LEAs not in states receiving RTT funds can be the catalyst for local reform leading to statewide practices consistent with RTT.
- **Local school districts already play a substantive role in pre-k education.** For example, fifteen percent of school districts have operational relationships with Head Start and Early Head Start programs. Two thirds of all children in publically funded pre-k are in public school settings. The collaborative potential of local school districts extends beyond pre-k to include early intervention for infants and toddlers through Part C of the IDEA.
- **LEA direct eligibility for RTT-ELC grants is a catalyst for true collaboration** between education and early childhood stakeholders. Thus far, the RTT-ELC program requires little at the state level with regard to including school districts in funding allocations and policy development, even when districts and their representative associations have been supportive of state applications. Because the potential impact of the program on standards, instruction, assessments, curriculum, teacher effectiveness and other fundamental LEA responsibilities is immense, the Department should not pass up this opportunity to create the inter-disciplinary collaboration that is essential to the overall success of a birth – grade 3 continuum of services and education.