

March 23, 2021

Dr. Miguel Cardona
Secretary of Education
U.S. Department of Education
400 Maryland Ave, SW
Washington, DC 20202

On behalf of the undersigned organizations representing rural students, school districts, superintendents, educators, and communities, we write to request that the U.S. Department of Education prioritize its commitment to providing rural students with the same opportunities for success as their counterparts in other locales. One of the most effective ways the Department can achieve this goal is by expanding its efforts to increase engagement with rural education stakeholders, promote staff understanding of the challenges facing rural local education agencies, and improve the intra-agency rural education-related policymaking efforts of and between the Department's senior leadership, White House Domestic Policy Council, and U.S. Department of Agriculture.

The following recommendations are the byproduct of the lessons learned from the Obama and Trump administrations and the 2018 Section 5005 Report on Rural Education. In light of the current efforts to safely reopen the majority of K-8 public schools, it is paramount that these organizational and process recommendations are incorporated to improve the Department's forthcoming policymaking regarding rural education and the implementation of President Biden's American Rescue Plan, even when the focus of the programs are not exclusively rural.

According to the National Center on Education Statistics (NCES), 28 percent of public elementary and secondary schools are in rural localities.¹ Before the pandemic, the challenges of rural local education agencies LEAs were well documented in research:

- rural LEAs face more difficulty attracting and retaining high-quality and diverse educators in various subjects;
- some rural districts lack the leadership pipelines to institute effective school turnaround models;
- many rural communities lack the resources and infrastructure necessary to expand broadband internet activity; and
- other rural school districts lack the staffing capacity to leverage federal grant programs in comparison to the budgets of large urban and suburban LEAs.

Since the disruptions to K-12 education at the outset of the COVID-19 pandemic, these issues have taken on new importance as rural school system leaders continue to address the heightened academic and mental health needs of rural students and staff. To ensure an appropriate federal response that provides rural school system leaders with the maximum flexibilities and tools to serve students during and after the pandemic, the Department must implement an agency-wide strategy that emphasizes the importance of staffing senior level rural education-related positions that elevate the profile of rural education to inform coordination of policy, programs, and grant-making activities throughout the organization's various offices.

¹ <https://www2.ed.gov/about/inits/ed/rural/rural-education-report.pdf>

U.S. Department of Education Organizational and Staffing Recommendations:

Under section 5005 of the Every Student Succeeds Act (ESSA), in 2018, the U.S. Dept. of Education released an internal review that assessed the methods, manner, and extent to which the Department utilizes input to address the unique needs and characteristics of rural LEAs. This self-assessment determined action-steps to improve the organization's development and implementation of the processes, procedures, policies, and regulations impacting rural LEAs, as well as meaningfully increase participation of rural school districts in the Department's programs and initiatives.

Using the findings from this review, the Department created the Office of Rural and Community Engagement within the Office of Communication and Outreach to ensure greater internal and external awareness of rural education needs and improve deliberations on policy development, communications, and technical assistance that impact rural education.² This reorganizational effort enhanced the Department's process of incorporating rural stakeholder feedback to improve policymaking. One of the improvements that resulted from this work includes the Department's decision to create a single online program to collect applicant information for the Small and Rural Achievement program, which greatly streamlined the paperwork burden associated with the grant. This structural change also improved the Department's outreach activities with organizations that represent officials involved in education, such as the Council of Chief State School Officers, AASA, The School Superintendents Association, and the National Rural Education Association.³

While these actions represent a step in the right direction, the Department must continue to improve its outreach with rural stakeholders and increase staff knowledge of the promise, challenges, and considerations concerning rural public schools. Specifically, the Department can build on the work from the past 8-years by recommending that the Biden administration and Congress prioritize the nomination and confirmation of a new Deputy Assistant Secretary (DAS) for the Office of Rural and Community Engagement (ORCE).

During the Obama administration, the DAS for Rural Outreach was responsible for maintaining good working relationships with career and political staff across multiple offices, including the Office of Elementary and Secondary Education, the Office of Innovation and Improvement, and the Office of Career, Technical, and Adult Education – offices that most often interact with and provide services to rural school districts. By filling the DAS position for ORCE, the Department will immediately have access to a senior-level leader that is the main point of contact to Congress, the Biden-administration, and education advocacy and research organizations, and is responsible for coordinating the organization's intra-agency rural education policy activities across multiple offices. However, more importantly, the staffing of this position will lead to improved transparency concerning the Department's rural education policymaking activities that will enable rural stakeholders to hold the organization accountable for improving its outreach activities to rural public schools.

Following the nomination and confirmation of a new DAS for ORCE, it is critical the Department re-institute its rural education listening sessions to understand the perspective of state and local school leaders working to access new funding from the American Rescue Plan and recover from the COVID-19 pandemic. After the passage of ESSA, the U.S. Dept. of Education conducted 200 listening sessions with stakeholders from across the education system to inform its policymaking process under the new law. In

² Ibid, pg. 8

³ Ibid, pg. 11

a similar vein, these listening sessions must again be utilized to inform the Department's implementation of the American Rescue Plan on rural public schools and LEAs. Furthermore, the newly confirmed DAS of ORCE should also work to formalize the Department's inter-POC rural working group. As background, this group was established in 2009 so that department staff could share information on developments in their respective subject matter areas and offer staffers a formalized setting to discuss and collaborate on the trends and initiatives impacting rural education. The reinstatement of this inter-agency taskforce will likely lead to an increased understanding of staff concerning the issues facing rural school systems and ensure that there is a focus on serving rural America in every aspect of the Department's policymaking process.

Finally, the U.S. Dept. of Education must advise the Biden administration to reinstate the White House Rural Council to better coordinate federal programs and maximize the impact of federal investments that promote economic prosperity and quality of life in rural communities. For context, this council was established in 2011 by former President Obama's [Executive Order 13575](#) to streamline and improve the effectiveness of federal programs serving rural America and better engage stakeholders on issues and solutions in rural communities. In light of the similarities between the former council's goals – and given the DAS of ORCE unique position to leverage feedback from rural school system leaders – it is imperative that the Department's DAS for ORCE work with representatives of the Department and the White House Domestic Policy Council to identify task force members, better facilitate intra-agency federal rulemaking at the intersection of agriculture and education (e.g., Title I, RLIS, federal school meals programs), as well as discuss and collaborate on intra-agency efforts concerning improving federal policy across agencies and Departments for rural America.

Even though there are many challenges ahead concerning the nation's return to normalcy, rural public schools and America are full of promise. While the pandemic has highlighted unprecedented challenges concerning rural educator shortages, lack of internet and broadband connectivity and the rise of student mental health and academic needs, our history of passing and implementing bold education-related proposals has provided the U.S. Dept. of Education and Biden administration with a playbook for how to move forward with the implementation of the procedures, guidance, and rulemaking activities concerning the American Rescue Plan without leaving out rural school systems. Therefore, to build on the federal education policy work from the past years, we encourage the Department to follow the recommendations in this brief. An abridged summary of those recommendations is included in the list below.

Policy Recommendations:

1. Maintain the Office of Rural and Community Engagement within the Office of Communication and Outreach to ensure greater internal and external awareness of rural education needs and improve deliberations on policy development, communications, and technical assistance that impact rural education.
2. Advise the Biden administration and Congress to prioritize the nomination and confirmation of a new Deputy Assistant Secretary (DAS) for the Office of Rural and Community Engagement (ORCE).
3. Re-institute its rural education listening sessions to understand the perspective of state and local school leaders working to access new funding from the American Rescue plan and recover from the COVID-19 pandemic.
4. Mandate the DAS of ORCE to formalize the Department's inter-POC rural working group.

5. Advise the Biden administration to reinstate the White House Rural Council to better coordinate federal programs and maximize the impact of federal investments that promote economic prosperity and quality of life in rural communities.

Sincerely,

AASA, The School Superintendents Association
American Association of Colleges for Teacher Education
Association of Education Service Agencies
Association of Latino Administrators and Superintendents
Association of School Business Officials International
Council of Administrators of Special Education
EDGE Consulting Partners
National Association of Secondary School Principals
National Center for Teacher Residencies
National Disability Rights Network
National Education Association
National Indian Impacted Schools Association
National Rural Education Advocacy Consortium
National Superintendents Roundtable
Organizations Concerned About Rural Education
PDK International
Teach For America