



Mr. Michael Chamberlain
U.S. Department of Education
400 Maryland Avenue, SW
Room 5E260
Washington, DC 20202

RE: Comments to Docket ID: ED-2017-OCO-0139

Every Student Succeeds Act (ESSA) Section 5005 US Department of Education Preliminary Draft Report

February 12, 2018

Dear Mr. Chamberlain,

On behalf of AASA--The School Superintendents Association and the Rural School and Community Trust, we write to reiterate our deep appreciation to the United States Congress for requiring the US Department of Education (USED) to conduct a comprehensive review and issue this report relating to administering and developing policies and regulations affecting rural schools and districts. We are pleased to offer comments concerning USED's preliminary report and look forward to working with the department to improve this document in advance of final submission to Congress.

First and foremost, we are concerned the report requirements as outlined in the *Every Student Succeeds Act (ESSA) Section 5005* have not been fulfilled. USED is mandated *to review the organization, structure, and processes and procedures for administering its programs and developing policy and regulations* in order to:

- *...assess the methods and manner through which, and the extent to which, the Department of Education takes into account, considers input from, and addresses the unique needs and characteristics of rural schools and rural local educational agencies (LEAs);*
- *...determine actions the Department of Education can take to meaningfully increase the consideration and participation of rural schools and local educational agencies in the development and execution of the processes, procedures, policies, and regulations of the Department of Education.*

In our opinion, while the draft document highlights outreach, listening sessions, and intra-departmental efforts, no findings are mentioned that could be implemented regarding how to improve services and supports for rural LEAs. For example, according to the draft, USED asserts:

Even before completing its review and analysis and in response to many of the concerns expressed at the listening sessions, the Department took a series of actions... to increase rural stakeholder input. These actions, which began before the completion of this report, are designed to meaningfully increase the consideration and participation of rural schools and LEA in the development and execution of the Department's processes, procedures, policies, and regulations.

While these steps may be laudable and moving in a productive direction, the preliminary draft report does not provide any anticipated outcomes regarding the future impact on and focus toward improving rural schools and districts engagement across USED offices and functions. To our knowledge, the department has not released documentation and/or comments gathered during their listening sessions or, most important, a strategy of how to implement what was learned from convening groups of rural educators and advocates.

In reviewing the section of the report titled “Recent Action the Department Has Taken to Increase Rural Stakeholder Input” we provide this critique for how the Department’s activities fall short of achieving the goals of ESSA Section 5005.

Create the Office of Rural and Community Engagement:

We acknowledge the department’s creation of the Office of Rural and Community Engagement as a successor to the Deputy Assistant Secretary for Rural Outreach position within the Office of Communications and Outreach. We have long argued that both the previous position and the current office structure does not have a policy function and therefore cannot effectively weigh in on programs, policies, and regulations impacting rural schools.

Such efforts would be much more effective if positioned in, for example, the Office of Elementary and Secondary Education with a robust policy and research agenda. The Office of Rural and Community Engagement is not charged or resourced to take the following much-needed recommendations to ensure the department adequately considers the needs of rural schools when developing policy and regulations:

- Release a regulatory impact analysis whenever the Secretary publishes a general notice of proposed rulemaking for any rule or regulation that may have a significant impact on state educational agencies or local educational agencies serving rural schools;
- Identify characteristics and needs of rural schools and the effects of current policies and proposed statutory, regulatory, administrative, and federal budgetary priorities on State Educational Agencies (SEAs);
- Produce an annual report on the condition of rural education delivered to the members of the Education and the Workforce Committee of the House of Representatives and the Health, Education, Labor, and Pensions Committee of the Senate and published on the department’s website;
- Identify innovative research and demonstration projects on topics of importance to rural schools, including gaps in research, and recommend topics for study by the Institute of Education Sciences (IES) and other research agencies;
- Provide information to the Secretary and others in the department with respect to the activities of other federal departments and agencies that relate to rural education, including activities relating to housing, agricultural services, transportation, economic development, career and technical training, health care, disability services, and mental health;
- Coordinate regulatory and policy implications with the Bureau of Indian Education, the Bureau of Indian Affairs, the Department of the Interior, and the schools administered by these agencies;
- Ensure the process by which rural districts access and receive their REAP funding is streamlined and efficient;
- Establish and maintain a clearinghouse for collecting and disseminating information on teacher and principal recruitment and retention at rural K-12 schools and districts;
- Improve access to, implementation and use of, technology and distance learning based on rigorous coursework at rural schools;
- Measure rural students’ progress and achievement, including low-income and minority students;
- Promote innovative approaches in rural education to increase student achievement;
- Increase higher education and career readiness and secondary school completion;
- Enhance access to, and quality of, childhood development for children located in rural areas;
- Expand access to, or partnerships with, community-based organizations in rural areas;
- Address the availability of professional development opportunities for rural teachers and principals.

Moving forward, we recommend USED evaluate and report how the aforementioned recommendations would be considered, reviewed, and developed into an implementation strategy. We are pleased to offer any assistance working with USED to achieve positive outcomes for rural students.

Participate in the Interagency Task Force on Agriculture and Rural Prosperity:

Rural education is mentioned often in the recently released report of the interagency *Task Force on Agriculture and Rural Prosperity*. However, some of the recommendations (connecting all K-12 schools to high-speed internet, improving access to mental health, expanding apprenticeship programs, etc.) run counter to recent policies endorsed by the USED and the White House more broadly.

For example, Chairman Pai of the Federal Communications Commission has advanced policies and proposals that would directly undermine recent efforts to expand and provide affordable and equitable access to broadband connectivity. The FCC oversees the sole federal education technology program—E-Rate—and proposed efforts that could have resulted in funding cuts or programmatic offerings. The FCC also reversed a policy that would have allowed the Lifeline program to address the homework gap, ensuring that students have access to internet at home. These changes, in combination with the FCC’s partisan vote to rescind network neutrality protections—are a direct threat to ensuring that our nation’s public schools and the students they serve can access broadband and related content.

In addition, the Administration has supported congressional efforts to block-grant Medicaid funding which would leave states struggling to come up with funding for mental health services for children in rural areas, who already lack access to these providers.

The goal of extending apprenticeship programs also is hard to understand when the President’s budget has suggested cutting the federal career and technical education program, the Carl D. Perkins Act, which can fund these apprenticeship opportunities at the K-12 and post-secondary level. We hope that as the Secretary of Education and others within the Administration begin implementing these recommendations that a comprehensive review of existing structures for meeting the needs of rural districts and communities is examined.

Serve as vice-chair of the President’s Task Force on Apprenticeship Expansion:

We are glad to see the Secretary’s active participation in this task force, however, the report makes no mention of the feedback received by rural stakeholders in regards to apprenticeship programs nor how the department will address many of the basic challenges in organizing and funding apprenticeship programs in rural school districts. Specifically, distance between school and work sites makes it challenging for students and teachers in rural communities to participate in apprenticeship programs. What steps will be taken to ensure apprenticeship programs are more readily and equitably available in rural communities and districts?

Issue grant competition for the Improving Rural Education Center:

According to the report draft: ... the Rural Center will (1) conduct research on a major problem or issue in rural education that involves local stakeholders and relates to their needs; (2) develop and test a practical tool or strategy to support the conduct and use of research by school personnel in rural settings; and (3) develop a statistical or methodological procedure or product that will help rural education researchers strengthen their ability to produce accurate, reliable, and useful research.

It is worth noting USED has a long history of establishing, through grant funding, rural education research centers and coordinating such effort through the Regional Education Labs (RELs). In our opinion, to date those

investments have not realized their full potential of creating a body of rural-centered and classroom-based data and analysis that has authentic applications for rural educators.

Our hope is that this next generation of a national Rural Center will be much more robust and engage local rural education practitioner voices in developing and conducting their research agenda and fulfilling other priorities as outlined in the grant framework.

Preliminary draft report recommends the following action items:

- Create a formal intra-agency rural workgroup within the department;
- Continue and expand rural listening sessions;
- Explore ways to simplify the grant application process;
- Provide appropriate training to rural schools and LEAs.

While the draft report enumerates how these four action items would be undertaken, there are no clear outcomes detailing how these activities would improve educational opportunities for rural students. In addition, there is no evidence the department's efforts to date have been documented. For example, USED references:

Between January 2016 and June 2017, [the department] conducted multiple webinars for hundreds of rural LEAs, with over 4,000 participants, focusing on the process of applying for a formula grant through grants.gov:

To our knowledge, there is no analysis of how effective and helpful these outreach efforts have been, how the information collected in these outreach efforts has been incorporated into USED work (if at all), and whether there has been follow-up with these participants. In short, is there documentation validating this effort had a positive impact for rural school leaders leading to more districts applying for formula grants? It also raises the question if technical assistance was offered for rural schools and districts to apply for department competitive grants.

In the section titled "Additional Actions the Department Can Take to Increase Rural Stakeholder Input" the draft report lists future actions that can be taken to increase the consideration and participation of rural schools and LEAs in the development and execution of the processes, procedures, policies, and regulations of the Department.

Create a formal intra-agency rural workgroup within the Department:

We were under the impression that this workgroup was meeting in the prior Administrations. We would hope these activities would continue and occur more frequently to ensure that the specific needs of rural schools are considered throughout the policies, grants, and programs issued and managed by the Department.

Continue and expand rural listening sessions:

Convening listening sessions with rural education stakeholders has shown the department's commitment to building relationships and gathering input from across the country. We appreciate these efforts and support continued engagement with those dedicated to improving education for rural students. In addition, please call on us to assist and provide guidance in planning future community-based gatherings.

Explore ways to simplify the grant application process:

We are thrilled the Department is examining how to make current grant application processes less burdensome for rural districts. This is the most positive and substantive step the Department has outlined within the entire draft report. We are happy to work directly with the Department in any way to assist with this endeavor.

Provide appropriate training to rural schools and LEAs:

We welcome the department's focus on technical assistance for rural schools and districts, particularly with regard to completing competitive grant applications and other documentation required for federal funding.

Develop a comprehensive communication plan:

While we are aware USED has developed a rural-focused communications plan aimed at improving the department's rural webpage and newsletter, we agree revising and updating the plan is overdue. Key to any effective public outreach and information-sharing strategy is outlining key deliverables and having a feedback system in place to measure how well educators and the public are receiving and utilizing information provided to rural schools and districts. One important consideration is many remote LEAs have limited access to high-speed broadband. Our recommendation is that multiple platforms be established to support information delivery, particularly with regard to grant applications. Conducting a REAP-eligible district communications survey to determine the best way districts wish to receive department communications would be instructive. We would be pleased to assist in designing such a survey.

Finally, we would like to express frustration and disappointment that this preliminary draft report was delayed. To quote *ESSA* enacted December 10, 2015:

Not later than 2 years after the date of enactment of this Act, the Secretary of Education shall-- (1) carry out each action described in the report under subsection (a) (3); or (2) in a case in which an action is not carried out, provide a written explanation to the Committee on Health, Education, Labor, and Pensions of the Senate and the Committee on Education and the Workforce of the House of Representatives of why the action was not carried out.

It was our sincere hope, with an additional six months, the department would have been successful in releasing a draft report for public comment that is detailed, accountable, and outcomes-based, and outlined an action item framework that USED was tasked by Congress to propose, including a pathway for implementation. The preliminary report, as drafted, falls short of this goal and remains an incomplete work. We urge USED to review thoroughly all public comments, incorporate them the final report, and announce a date when the final report will be submitted to Congress.

Sincerely,

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