



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 20, 2018

Dear Mr. Chamberlain,

On behalf of the National Association for the Education of Young Children, as informed by the expertise of the organization's Rural Interest Forum, we are pleased to submit these comments in response to the US Department of Education's preliminary report related to the administration and development of policies and regulations affecting rural schools and districts.

In their new report, entitled "Out of the Loop," the National School Boards Association's Center for Public Education makes the case that the national conversation around education often neglects the perspectives, needs, and circumstances of rural America, despite high needs and widespread challenges.¹ In this light, NAEYC appreciates both the intention of Congress in establishing the requirements for the Department of Education to conduct this review and issue this report, as well as the efforts of the Department to meet those requirements.

While more, and more targeted, attention is needed to address the unique strengths, needs and characteristics of students, families, and educators in rural communities, NAEYC and the Rural Interest Forum encourage the Department of Education to support efforts that make high-quality early childhood education, beginning at birth, part of the solution. Decades of research have made clear the reality that investments in early childhood education will, in the short- and long-term, work to lessen the deep poverty, isolation, and inequality experienced by many rural communities.

Engaging early childhood educators and families with young children should be a focus for the additional actions that the Department can take to increase rural stakeholder engagement. We strongly encourage the Department to seek out the perspectives of its K-3 educators and elementary school principals in particular, while also upholding and engaging in inter-agency partnerships which elevate the voices of current and prospective early childhood educators and families with young children.

¹ Center for Public Education, National School Boards Association. Out of the Loop. 2018. Retrieved February 2018 via https://cdn-files.nsba.org/s3fs-public/10901-5071_CPE_Rural_School_Report_Web_FINAL.pdf



The following recommendations provide additional strategies to meet the intent of the Department's request, while also providing suggestions that focus on creating compelling and engaging reasons for rural stakeholders to participate at all. To that end, NAEYC suggests that the Department of Education explore the following opportunities:

- Use the Regional Education Labs (RELs) to develop and implement an intentional strategy that connects citizens, educators, and the Department of Education in a feedback cycle that results in regular responses to rural participants following recommendations to and actions from the Department of Education
- Organize “data camps” for rural state education agencies in order to collate, coordinate, and share data collected on rural schools from all research entities funded by the Department. Data and findings should be shared with SEAs, using a variety of platforms and media, in comprehensive and easy-to-interpret formats based on geographic region and size of schools/school districts.

In addition, as the Department of Education considers how to support students and educators in rural communities, we encourage you to focus on the professional development of educators, as well as their access to affordable, accessible, quality higher education. This includes not only efforts to expand broadband access, but also efforts to maintain and expand loan forgiveness and cancellation programs; to provide support to students who are also parents by helping them afford child care while they complete their degrees and credentials through the CCAMPIS program; and to explicitly and intentionally include teacher preparation and early childhood education in the design of any apprenticeship programs.

Finally, although rurality is suggested as a quality to consider in grant distribution, we also encourage the Department to add measurements or requirements that promote this consideration and ensure additional equity for rural communities.

We thank you for the opportunity to submit these comments, and stand ready to assist the Department in a consideration of the investments in and expansion of high-quality early childhood education in communities across the country, including rural communities.

Sincerely,

Rhian Evans Allvin, CEO
National Association for the Education of Young Children