



National Association of Federally Impacted Schools

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February 20, 2018

Mr. Michael Chamberlain
US 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) Sec 5005 US Department of Education Draft Report

Dear Mr. Chamberlain,

On behalf of the National Association of Federally Impacted Schools (NAFIS), we write in response to the request for public comment on the US Department of Education's (Department) draft report on rural education required under Section 5005 of the Every Student Succeeds Act (ESSA).

NAFIS represents school administrators and school board members of the 1,200-plus Impact Aid-recipient school districts nationwide that educate more than 10 million students. Impact Aid is the oldest elementary and secondary program and its purpose is to reimburse school districts for a loss of local revenue due to the presence of nontaxable federal property such as military installations, Indian Trust, Treaty, or Alaska Native Claims Settlement Act lands, federal low-income housing facilities, national parks and laboratories. Congress recognized in 1950 that the federal government had an obligation to help meet the local responsibility of financing public education in these communities. That same recognition holds true today.

ESSA required the Department to "review the organization, structure, and process and procedures of the Department of Education for administering its programs and developing policy and regulations." **NAFIS supports proposed recommendations in the draft report, including creating an intra-agency rural workgroup, simplifying the grant application process, and providing appropriate training to rural schools and school districts.** We encourage you to include the Impact Aid program office in intra-agency collaboration efforts and urge you to consult the Impact Aid staff as to how the Department can better support rural school districts. Their experience is a valuable asset that the Department has historically underutilized. In particular, their insights on the unique needs of rural school districts and effective technical assistance strategies from their direct work with over one thousand school districts should be reflected in the final report's recommendations. Recommendations could include simplifying and modernizing the application process through an Electronic Data Count, including updating the survey date regulations to streamline this process.

Another recommendation to incorporate both intra-agency collaboration and increased technical assistance is on the various consultation requirements to ensure that Tribal leaders, community stakeholders, and parents have an opportunity to provide meaningful input into the educational

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program. This includes, as the report describes, “new requirements intended to improve communication and consultation between LEAs and Indian Tribes.” The new requirements are in addition to the Title VI outreach requirements and the Impact Aid Indian Policies and Procedures, which are critical to advance culturally relevant curriculum, integrate Native language and culture, and increase community and Tribal engagement.

Several priority areas of the report for rural schools are disconnected from the actions of this Administration despite the report’s assertion that it “used listening sessions, outreach and engagement, research, and its internal self-assessment to collect input that has informed policy decisions and helped in the development of recommendations for actions to increase the consideration and participation of rural stakeholders in the Department’s decision-making process.”

- We agree with the report’s finding that distinct challenges rural school districts face include teacher and administrator recruitment and retention, lack of broadband internet access, and transportation. The report also explains the Impact Aid program and the fact that 40 percent of the recipient school districts are rural. Yet the Administration’s original Fiscal Year 2019 budget request proposed to eliminate Impact Aid Federal Properties and reduce Impact Aid Basic Support payments by 44 percent. Funding reductions of this magnitude could severely impact the staffing, programs and services of school districts, with the potential for school closures. Like many federally impacted schools in rural areas, per-pupil costs are high because of challenging economies of scale and local resources are constrained because of tax caps, limited assessed value, or lack of taxpayers. These districts are the economic hub of their communities – often serving as the largest employer, a community gathering place, the only place to access broadband or workforce training. Additional investments in Impact Aid are critical to help school districts close achievement gaps, update technology, expand access to early childhood and afterschool programs, integrate culturally-relevant curriculum, replace failing infrastructure, offer competitive salaries to recruit and retain school leaders, and more.
- The report acknowledges the “distinct disadvantage of” rural school districts to compete with their suburban and urban counterparts for grants, in part due to the lack of capacity to navigate complex grant applications. Yet the Department is significantly reducing its own staff capacity, which will have a direct impact on the availability of technical assistance for school districts. The Impact Aid program office is a good model for providing technical assistance to school districts, but the office needs additional resources in order to be able to expand upon this work. For example, the Impact Aid program office staff has been significantly reduced, limiting opportunities for staff to provide in-person technical assistance, despite significant regulatory and statutory changes within the last several years.
- The Administration has messaged extensively about the importance of serving rural communities and the federal government’s responsibility to support their capacity through the Rural Prosperity report (which includes numerous references to education) and the proposed infrastructure initiative. However, no direct grants for school districts were included in the infrastructure plan and no mention was made in the draft report of the school facility needs of rural school districts. NAFIS has [identified](#) more than \$4.2 billion in pressing school facilities needs for federally impacted schools.
- The report acknowledges the Department’s reorganization, including the establishment of the Office of Rural and Community Engagement (ORCE), which is similar to positions in previous administrations responsible for “effective dissemination of information and coordination with the rural education community.” We appreciate the electronic and in-person communication we have had with this office including our conversations on Impact Aid, infrastructure, and funding. However, we recommend a further restructuring to ensure that there is a designated position

within the Department that reports directly to the Secretary, with the primary responsibility to ensure that the needs of rural school districts and the students they serve are met in the policy and budgetary development process. Without this change, the Department will continue to overlook the needs of rural school districts – such as the examples listed above – in its most important decisions.

- We appreciate the rural focus in the Department’s draft regulatory priorities, but are [concerned](#) about how that fits in with the broader privatization framework. Private school vouchers do not increase choice for students living in rural areas, in part due to limited options beyond local public schools, tuition and fees not covered by the voucher, and prohibitive transportation costs. At the same time, the funding reduction caused by a voucher program could severely limit the staffing, programs, and services of school districts who are dependent on Federal funds to keep their doors open. Like many federally impacted schools in rural areas, resources are already constrained and per-pupil costs are high because of challenging economies of scale. These districts are the economic and social hub of their community, often serving as the largest employer or a community gathering place.

While the draft report is an important initial step, it falls short of meeting the statutory objectives. For example, **the report acknowledges the outreach, listening sessions, and intra-departmental efforts, but fails to report any findings that could be implemented regarding how to improve services and supports for rural school districts.** In addition, the draft report provides no anticipated outcomes regarding the future impact on and focus toward improving rural schools and district’s engagement across the Department’s offices and functions. We urge you and the Secretary to visit federally impacted schools and incorporate their input into the final report.

We appreciate the opportunity to provide input on the draft report and look forward to continuing to work with you to support rural school districts. Please reach out to us with any questions or if you are interested in visiting a public rural federally impacted school.

Sincerely,



Hilary Goldmann
Executive Director



Jocelyn Bissonnette
Director of Policy & Advocacy