



# National Association of Federally Impacted Schools

444 N. Capitol St., NW, Ste. 419 | Washington, DC 20001 | (p) 202.624.5455 | [www.NAFISDC.org](http://www.NAFISDC.org)

November 13, 2017

Ms. Jennifer Bell-Ellwanger  
U.S. Department of Education  
400 Maryland Ave. SW., Room 6W231  
Washington, DC 20202

RE: Secretary's Proposed Supplemental Priorities and Definitions for Discretionary Grant Programs  
RIN 1894-AA09/ Docket ID ED-2017-OS-0078

On behalf of the National Association of Federally Impacted Schools (NAFIS), we write in response to the request for public comment on the Secretary's Proposed Supplemental Priorities for Discretionary Grant Programs. Specifically, we offer our views on Proposed Priorities 1 and 11.

NAFIS represents school administrators and school board members of the 1,200-plus Impact Aid-recipient school districts nationwide that educate over 10 million students. Impact Aid is the oldest elementary and secondary education program and its purpose is to reimburse school districts for a loss of local revenue due to the presence of non-taxable Federal property such as military installations, Indian Treaty, Trust, 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.

## **Proposed Priority 1: Empowering Families to Choose a High-Quality Education that Meets Their Child's Unique Needs**

We are concerned that the Secretary's first priority to "maximize" "educational choice" will advance school privatization schemes, such as vouchers, rather than invest in public schools. Voucher programs do not serve all students, fail to improve academic achievement, undermine public education funding, harm religious freedom, and lack critical accountability for taxpayers. The Department's first priority should be funding, supporting, and strengthening our public schools, where 90 percent of students attend.

Prioritizing access to private school vouchers would negatively impact the students targeted by Priority 1 – including rural, Indian lands and military connected students – and public schools that educate them.

Private school vouchers do not increase choice for students living in rural areas. Lack of schools beyond the local public school, tuition and fees not covered by the voucher, and transportation are often prohibitive. 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, serving as the largest employer or a community gathering place.

## **THE NAFIS FAMILY**

### **MISA**

Military Impacted  
Schools Association

### **NIISA**

National Indian Impacted  
Schools Association

### **FLISA**

Federal Lands Impacted  
Schools Association

### **MTLLS**

Mid-to-Low-LOT  
Schools

For Native American students – for whom the Federal Government has a trust responsibility – public school districts must abide by various consultation requirements that ensure that tribal leaders, community stakeholders, and parents have an opportunity to provide meaningful input into the educational program. This includes a Tribal Consultation Requirement in the Every Student Succeeds Act, as well as the Indian Policies and Procedures in the Impact Aid program. Partnerships between school districts and local communities have advanced culturally relevant curriculum, including the integration of Native languages and cultures.

Rather than prioritizing school privatization, the Department should prioritize resources for existing formula-based programs like Impact Aid. Impact Aid funds are efficient and flexible. Because Impact Aid is a replacement for lost local tax revenue, when Impact Aid funding is stagnant or funding is cut, local taxpayers have to increase their tax burden or students go without. Some states cap tax increases, limiting local revenue from year to year, while other communities can generate only a few thousand dollars annually from the limited taxable property within their boundaries. Additional investments in Impact Aid are critical to address a number of the other proposed priorities – including 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.

**Proposed Priority 11: Ensuring that Service Members, Veterans, and Their Families Have Access to High-Quality Educational Choices**

Public schools are uniquely positioned to support and educate military-connected students. Public school districts serving military families, and the students themselves, face unique challenges such as high mobility and the stress related to deployment. Public school districts with concentrations of military connected students recognize these challenges and offer a complex system of supports, including the academic and emotional supports necessary to support this unique population through parental deployment and mobility. This includes student-to-student and counseling programs as well as teacher professional development.

In addition, the military student identifier included in the Every Student Succeeds Act is being implemented for the first time. The achievement data will be able to inform teaching and learning, and improve targeted support for public schools serving military connected students.

The Military Interstate Children’s Compact is an agreement among the 50 states and DC designed to address military family mobility issues related to education, such as enrollment, placement, attendance, and graduation. Students that opt out of the public school system are not covered by the provisions of the Compact, since it applies only to public schools.

We look forward to working with you to refine these priorities. Thank you for the opportunity to provide input.

Sincerely,



Hilary Goldmann  
Executive Director



Jocelyn Bissonnette  
Director of Government Affairs