

April 27, 2010

The Honorable Arne Duncan
Secretary, U.S. Department of Education
400 Maryland Ave, SW
Washington, D.C. 20202-0008

Dear Secretary Duncan,

We wish to extend our sincere appreciation for the time you spent with us Monday, April 5 on the phone to further explain what we see as the issues facing rural states. Your candor, support and understanding are invaluable to us moving forward both as states and as a country, and we are grateful.

In following that conversation, we wanted to summarize our key concerns and proposed solutions regarding the issues of rural states and districts. We see opportunity for flexibility and alternatives regarding the School Improvement Grant (SIG) turnaround models for our lowest performing schools, broadband access, requirements facing State Education Agencies (SEAs) and districts, and the criteria for competing in the Race to the Top (RTTT). We look forward to additional interactions on potential broadband access opportunities from the Federal Communications Commission (FCC), flexibility around school improvement interventions for the lowest performing schools, and the proposed \$1.8 billion in community and school engagement funds.

As we discussed, the extreme rural nature of some of our districts makes any of the four turnaround models required under SIG difficult if not impossible to implement. In Montana, following intense interaction, the state was able to get all five identified districts to sign a pre-application agreeing to carry out the components of the transformation model. Yet U.S. Department of Education (USED) staff pushed back on the state because their application did not look like what other states submitted. We ask your department to recognize the efforts of our SEAs and to move away from seeking uniformity and checked boxes as a method of decision making.

It is clear, based on the Round I awards and the parameters set in the RTTT application, that our rural states face significant challenges when it comes to being competitive with other states. In the area of charter schools alone, you have made it clear that states without charter schools start out behind in the race. Also, several states do not have the resources to hire grant writers to apply for RTTT, in some cases even expending further energy and money seeking private donations to do so. Could this really be the best use of an SEA's time, when the demands and challenges facing our schools are unprecedented and they need our help day-to-day more than ever?

Regarding the focus on charter schools for both SIG and RTTT, states face a conundrum. Charter schools are defined by their freedom from many federal and state regulations that apply to traditional public schools. Yet several states have articulated their inability to pass charter school legislation, or to garner public support, and in some cases are actively opposed to them. One option is to remove the restrictive federal regulations from existing public schools, fostering a charter school movement utilizing our existing facilities, faculty and resources.

As we explained in our call with you recently, many of our districts are considered frontier¹. We articulated challenges faced by districts in the remote areas regarding recruitment and retention of principals and staff. The challenges of these lowest performing districts do not rest solely on the backs of their principal, and we struggle to find quality administrators willing to take the helm of a school in such dire circumstances. Further, the idea of firing half the staff at these schools and finding replacements is a virtual impossibility. We are asking for flexibility for intervention programs that work in the specific communities that can truly address the roots of the issues our students face, such as extreme poverty, isolation and lack of quality services.

Our rural states, like all of America, have been hit hard by this recession. Our state agencies budgets were already small, but with recent further cuts, we have lost significant portions of our staffing, and school budgets continue to shrink. By forcing our already stretched agencies to participate in such a rigorous competitive grant application, *Race to the Top* is detracting from the very real issues that need our immediate attention, and actually takes away from the services our students and schools need and deserve.

We want one thing to be perfectly clear. We rural states are NOT trying to shirk our responsibilities or avoid being held accountable. Quite the opposite: We know that if we do not fight for access and opportunities for our students at this critical time in our nation's history, no one else will. Therefore we will continue to press your administration to truly consider what is best for all students, across America, rural and urban, regardless of what competition their SEA wins.

This May we will be getting together with CCSSO President Gene Wilhoit to develop policy solutions to guide the reauthorization of ESEA. We would welcome any opportunity to meet with you to further explain our suggestions.

Sincerely,



Armando Vilaseca, Commissioner
Vermont Department of Education

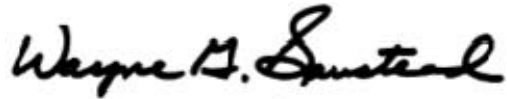


Denise Juneau, Superintendent of Public Instruction
Montana Office of Public Instruction

¹ As defined by the U.S. Census Bureau matrix, based on population per square mile, and distance and travel time to services.



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