

PETER SHUMLIN
Governor



State of Vermont
OFFICE OF THE GOVERNOR

June 14, 2013

The Honorable Arne Duncan
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

The Honorable Kathleen Sebelius
U.S. Department of Health & Human Services
200 Independence Avenue, SW
Washington, D.C. 20201

Dear Secretaries Duncan and Sebelius,

In a *Federal Register* notice dated May 20, 2013, Secretaries Arne Duncan and Kathleen Sebelius proposed and solicited public comments on their priorities, requirements, definitions, and selection criteria for Fiscal Year (FY) 2013 Race to the Top – Early Learning Challenge Grant (RTT-ELC) program. The State of Vermont is very pleased that it will have an opportunity to apply for a RTT-ELC grant later this year and appreciates the invitation to provide public comments on the proposed FY 2013 RTT-ELC grant program's administration, priorities, requirements, definitions, and selection criteria.

First, we request that the proposed FY 2013 RTT-ELC grant program's priorities, requirements, definitions, and selection criteria be modified so that small, rural states such as Vermont receive extra consideration when their FY 2013 RTT-ELC grant applications are rated and scored. Rural states with small populations and very small school districts relative to states with large populations, major urban centers and large school districts, generally have unique challenges and we encourage you to allow reviewers the flexibility to acknowledge this difference and reward points accordingly.

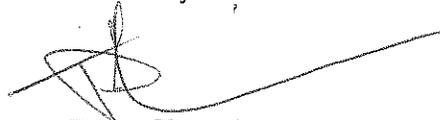
Compared with states with large urban areas, rural states face different challenges with improving the quality of early learning and development, closing the educational gaps for children with high needs, increasing the number and percentage of low-income and

disadvantaged young children who are enrolled in high-quality early learning and development programs, designing and implementing an integrated system of high-quality early learning and development programs and services. To address these different challenges, rural states may propose innovative approaches to tackle these challenges in their FY 2013 RTT-ELC grant applications, and they should receive extra points for doing so.

Second, we request that the FY 2013 RTT-ELC grant application review process and your proposed FY 2013 RTT-ELC grant program's priorities, requirements, definitions, and selection criteria be changed so that they reflect more fully the Obama administration's emphasis on integration and collaboration across its health, education, and human services programs and policies. Because the RTT-ELC grant program is jointly administered by the U.S. Department of Education (US DOE) and the U.S. Department of Health and Human Services (US DHHS), we request your FY 2013 RTT-ELC grant application reviewers have professional experiences and backgrounds across the fields of educational, maternal and child health policy areas. We also ask that the FY 2013 RTT-ELC grant program's priorities, requirements, definitions, and selection criteria emphasize that states must propose to implement at the state-level an integrative and collaborative approach in their grant applications that mimics the joint collaborative approach taken by the US DHHS and US DOE at the federal level.

Again, the State of Vermont welcomes this opportunity to provide its public comments on the proposed FY 2013 RTT-ELC grant program competition and administration. If you have any questions or comments, you can reach me through Aly Richards at Alyson.Richards@state.vt.us or 802-828-6403.

Sincerely,

A handwritten signature in black ink, appearing to be 'Peter Shumlin', with a long horizontal line extending to the right.

Peter Shumlin

Governor