



## OFFICE OF THE GOVERNOR

SPRINGFIELD, ILLINOIS 62706

**Pat Quinn**  
GOVERNOR

July 20, 2012

Office of Elementary and Secondary Education  
Attention: Race to the Top-Early Learning Challenge Phase 2 Comments  
U.S. Department of Education  
400 Maryland Avenue, S.W.  
Washington, D.C. 20202-6200

Re: Race to the Top-Early Learning Challenge Phase 2 Awards: Docket ID ED-2012-OESE-0012

Dear Sir or Madam:

Thank you for the opportunity to comment on the notice of proposed requirements for Phase 2 of the Race to the Top--Early Learning Challenge (RTT-ELC2) program. These comments are submitted jointly on behalf of the Illinois State Board of Education (ISBE), the Illinois Department of Human Services (IDHS), and the Office of the Governor. Phase 2 of the RTT-ELC program will support our state's efforts to improve the quality of early learning and development programs and close the achievement gap for children with high needs. However, we believe the proposed requirements can be strengthened through the clarifications and modifications described below.

### **Proposed Application Requirements, Subsection (a)**

The proposed requirements indicate that an eligible applicant must describe how it will implement the activities described in response to Criteria A(3)(a)(1), Core Area B and Competitive Preference Priority 2 of its application. The proposed requirements are not clear as to whether applicants can make adjustments in the scope, budget, timeline, and performance targets for these areas given the more limited budget in this round. We request that the final requirements clearly permit reductions and adjustments in the scope, budget, timeline, and performance targets for the activities in Criteria A(3)(a)(1), Core Area B, and Competitive Preference Priority 2.

**Proposed Application Assurances, Subsection (b)**

The proposed application assurances require a State to "maintain its commitment to and investment in high-quality, accessible early learning and development programs and services for children with high needs, as described in Section A(1) of its FY 2011 RTT-ELC application." As proposed, this assurance does not clearly indicate the budgetary expectations imposed on RTT-ELC2 finalists. We ask that you to clarify this assurance requirement for Phase 2 applicants.

**Proposed Application Requirements, III, (d)**

The proposed requirements require a state to "use funding to support only those activities included in an eligible applicant's FY2011 RTT-ELC application." Since the initial application process and submission of the application, we have engaged in information gathering, planning, and implementation of some activities related to the RTT-ELC even though funding was not received in the first round. There have been lessons learned and new information procured. Based on this new information, Illinois proposes that the RTT-ELC Phase 2 grant application allow for reasonable modifications to proposed activities to be included in the grant response.

**Term of the Grant**

The proposed requirements do not indicate whether RTT-ELC2 funds are available for a four-year grant period. We recommend flexibility for States with respect to the term of the grant period, not to exceed four years.

**Contracting and Sub-grant Restrictions**

We request clarification on the contracting and sub-grant requirements that will apply to RTT-ELC2. In particular, can funds be sub-granted under this program?

**Application Documentation**

The proposed requirements do not specify if letters of support and the tables in section A(1) need to be resubmitted for the RTT-ELC Phase 2 grant application. We recommend that states are not required to resubmit this information.

Thank you again for the opportunity to comment on the proposed requirements.

Sincerely,



Julie M. Smith  
Deputy Chief of Staff, Office of the Governor