

**Public Comments for Race to the Top – Early Learning Challenge**  
**Maureen Wiebe, AACCS**

On behalf of the American Association of Christian Schools, I am writing to express grave concern over the proposed requirements in the Race to the Top - Early Learning Challenge. The AACCS is a national organization and most of our member schools across the country offer pre-school opportunities for those parents who choose to send their children to school before the kindergarten age. Our schools serve families from all levels of income, and provide quality programs with seamless instruction between grade levels. A key component to the success of these schools is the autonomy which they enjoy because they do not receive public funds. This autonomy gives the schools the freedom to employ the highly qualified teachers that best align with the school's mission and vision, and to utilize the curricular and teaching methods that will best educate the children under their care. These schools are accountable to the parents of the children, and are therefore strong supporters of the family unit. Without question, quality parenting is the best predictor of a child's future success and development emotionally, socially, physically, and intellectually. The recognition of parental authority and autonomy of the school are the key components to the success of the education offered at the non-public early learning programs.

We have grave concerns that the proposed requirements for the RTT-ELC fail to recognize the excellent work of existing non-public early education programs, and the vital role and responsibility that parents have for their young children. In so doing, the RTT-ELC will cause the federal government and the state governments to overreach into the private sector and greatly hinder the positive education that is already taking place in the private sector (which is the majority of existing preschools).

The proposed requirements for the RTT-ELC state that in order for states to be eligible they will have to have a plan to bring all early learning programs (including private and non-regulated) under their improvement system and licensing program. Specifically, the requirements explain that a goal of the state should be that all licensed or state-regulated programs will participate in the improvement plan, and that states should have a "licensing and inspection system that covers all programs that are not otherwise regulated by the State and that regularly care for two or more unrelated children for a fee in a provider setting." This will inevitably bring the private and faith-based early learning centers and preschools under governmental control, even though they do not operate with public funds and already have a strong accountability system in place to ensure the quality of their programs. This increased regulation will only provide unnecessary burdens for these schools and programs, and will undoubtedly hinder the great work that they are already doing with young children and for their families. In addition, the assessment requirements stated in the proposal again will require states to assess programs that are not funded by either the state or federal government, again causing increased and unnecessary governmental regulation for the non-public early learning centers.

This proposal will inevitably lead to greater regulation, more federal control, and ballooning costs to states, communities, and the federal government. Rather than increasing educational opportunities for young children and their families, this government program will only decrease

the educational choices that parents will have for their children by hindering the excellent early educational programs already offered by private and faith-based centers and schools.

In order to ensure that the existing privately-run and faith-based programs remain successful and able to operate, we strongly recommend that these proposed requirements undergo extreme revision to ensure that they do not require states to infringe on the freedoms that are allowing excellent education to take place across the country in the privately-run and faith-based centers. A program designed to better the education in America should not do so at the sacrifice of the existing, successful educational programs in our nation.