Comments of the National Association of Elementary School Principals

I. Introduction

The National Association of Elementary School Principals (NAESP), founded in 1921, is pleased to provide comments on the Commission’s most recent Notice of Proposed Rulemaking (Public Notice). NAESP leads in advocacy and professional support for the nation’s 65,000 elementary and middle school principals in the United States and internationally. NAESP is a professional association representing over 20,000 of the nation’s elementary and middle-level principals who serve approximately 33 million children in prekindergarten through the eighth grade (pre-K-8). NAESP offers services for principals as the primary catalysts for creating lasting foundations for learning through policy development, advocacy, professional development programs, and resources for effective instructional leadership. NAESP advances the profession on behalf of all principals, providing specialized support and mentoring for early career principals. Key focus areas include pre-K-3 education, school safety, technology and digital learning, and capacity-building educator evaluation. NAESP administers the National Principals Resource Center and the American Student Council Association.
NAESP is also a supportive member of the Education and Libraries Networks Coalition (EdLiNC), and works to uphold the coalition’s mission to accelerate the deployment of advanced telecommunications and information services in schools and libraries.

In light of the three issues raised in the most recent *E-rate Modernization NPRM*¹, NAESP issued a survey² of principals from rural, suburban and urban settings to offer the following comments surrounding (1) how best to focus E-rate funds on high-capacity broadband, especially high-speed Wi-Fi and internal connections; (2) whether and how the Commission should begin to phase down or phase out support for traditional voice services in order to focus more funding on broadband; (3) whether there are demonstration projects or experiments that the Commission should authorize as part of the E-rate program that would help the Commission test new, innovative ways to maximize cost-effective purchasing in the E-rate program.

In addition to endorsing comments provided by EdLiNC, NAESP offers the following comments in order of priority in feedback received from the nation’s elementary and middle level principals. NAESP offers comments based on the key areas raised by its membership.

I. Elementary and middle level principals find the E-rate program critical for school success and support the program’s modernization through streamlining the application process, maintaining focus on Priority II when sufficient needs are met for Priority I areas, and slowing down any effort to make a major, permanent structural overhaul of the program at this time.

II. Principals urge the Commission to increase the overall cap to $5 billion to meet demand and to sustain the program’s longstanding support for broadband in schools and libraries.

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¹ Modernizing the E-Rate Program for Schools and Libraries, WC Docket No. 13-184, Public Notice, released March 6, 2014

III. Elementary and middle level principals believe the overall demand on the E-rate program must negate any efforts to provide pilot or demonstration projects in absence of an additional hike in the cap.

IV. Elementary and middle level principals are concerned about the removal of voice services from the E-rate program’s eligible service list, but understand the Commission will move forward. Principals request that schools have sufficient time to prepare, and access to alternative service coverage as the phase out process moves forward.

I. Elementary and middle level principals find the E-rate program critical to school success and emphasize the need to streamline the application process, and focus on Priority II when sufficient needs are met concurrently for Priority I applicants. Principals urge the Commission to slow down any effort to make a major, permanent structural overhaul of the program at this time.

Principals believe the E-Rate program is extremely successful and urge the Commission to maintain focus on providing access to schools in need of needed for school success. As outlined in our initial comments last year, public schools in the U.S. educate more than 33 million children, with more than 57,000 schools serving Title I-eligible students. We have found E-rate supporting nearly every classroom that has basic internet connectivity. According to an NAESP principal from Bloomfield, New Mexico, “E-Rate funding has helped districts across the country maintain Internet access and provide students opportunities to engage in 21st century learning. Considering the current budgets, without E-Rate funding schools would not be able to provide these opportunities to students.”

Since its inception, the E-Rate program has worked with great success to ensure that students and educators are connected to the Internet and have access to online communications – schools today cannot provide a 21st Century education in isolation of access to technology. All NAESP members report that their schools or districts have applied for E-Rate funding, but general access remains a big concern, particularly in rural schools. 85% of all principals surveyed felt general access to broadband was more important than internal connections at this time (with an equal
number of rural and urban/suburban schools responding)\textsuperscript{3}. Given the continued need to access connectivity, NAESP urges the Commission to maintain the program’s current form and allow schools to tailor applications to best meet the needs of their individual school community, and choose services and technologies appropriate for the building. When identifying technology needs in schools, principals cite needs from access to high speed connectivity, updating classroom computers, integrating technology in a meaningful manner within each classroom, and the need for additional network drops to meet the needs of more online standardized testing requirements to 2:1 computers, eMINTS training, wireless throughout the school, or maintaining and/or replacing equipment that was purchased almost a decade ago.

The varied needs correspond to the different geographical location, size, and levels of poverty in schools. Equity continues to be a major issue since schools serving high concentrations of disadvantaged students present unique challenges and technology needs, therefore making tailored applications a critical function of the E-rate program.

Given the disparities in school access to broadband, the nation’s elementary and middle level principals are concerned about the ability of the E-rate program to meet the overall needs of schools limited exclusively to Priority II. An elementary school principal from Vermont explains, “\textit{E-Rate funding has not kept up with the demands of state and federal mandates around developing 21\textsuperscript{st} century skills and online assessments. We need better access and infrastructure.}” This issue was noted in many schools focusing on transformation and improvement, which relies heavily on access to appropriate technology connectivity and infrastructure, particularly in rural schools. Many principals are struggling to provide their school with basic connectivity that will allow them to meet the expectations of a digitally-rich student learning environment – a staggering 85% of principals noted that access to broadband was more important than internal connections at this time.

\textsuperscript{3} National Association of Elementary School Principals \textit{E-Rate Survey of Pre-K-8 Principals}, Alexandria, VA, issued March 2014.
Now more than ever, accelerating the deployment of advanced telecommunications and information services in schools and libraries is imperative. As instructional leaders, principals work to help every student reach their greatest potential. Their leadership depends primarily on the ability to equip schools with technology when needed, and steward the use of technology to solve learning challenges. Principals are becoming masters of navigating programs, gadgets, and curricula to best utilize resources. However, before they are able to apply the principles of learning science to these leadership competencies, they must have basic levels of access to appropriately outfit their schools.

NAESP supports modernization by improving the online filing process and streamlining the application to make the program more efficient, allowing Priority I applicants seeking recurring services to submit multi-year applications. This is consistent with previous comments and believe that this change would help the almost twenty percent of individual schools that do apply but have time constraints with an overly burdensome application process.

II. On behalf of the nation’s elementary and middle level principals, NAESP continues to urge the Commission to increase the overall cap to $5 billion to meet demands and sustain the program’s longstanding broadband support for schools and libraries. Additional statistics confirm the varied and significant needs of schools.

Although the E-rate program has been incredibly successful, it must be expanded to keep pace with demand now and in the future. NAESP notes the findings from the Consortium for School Networking (CoSN) E-Rate and Broadband Survey in 2013, which reported, “The current cap on the E-rate is inhibiting the program from meeting districts’ needs.” While 99% of districts agreed they will need more broadband over the coming 36 months, over 70% schools surveyed by NAESP indicate that their districts are not meeting their basic connectivity needs, let alone Priority II services. The evolution of technology and demand within the program is well-documented, and NAESP is concerned that actual demand is not well known because most applicants no longer bother to apply for the dwindling Priority II funds. A principal from Colorado simply noted, “We have not applied for Priority II because there are no funds.”

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It is clear that the current program cap is insufficient to meet applicant demand since no funding was provided for Priority II services in 2013, and Priority I demand alone superseded the cap by a significant amount, leaving very few dollars to put towards Priority II. NAESP is concerned that this will be a recurring issue with the projected increase in Internet access demand if Priority I and Priority II needs are not addressed concurrently.

Given this concern, NAESP does not support a major structural overhaul of the E-Rate program. In our previous comments, NAESP explained our support for the E-rate program’s structure of allowing schools to tailor applications to meet their technology needs and challenges and the focus on poverty and equity. NAESP continues to support this structure, but believes the major structural weakness of the program is the lack of adequate funding. Additionally, as noted above the program would also benefit from other changes such as streamlining the application process. The Public Notice proposes significant structural shifts to Priority II, including a specific set aside and proposing to substitute the current, poverty driven distribution with three new options. First, NAESP believes that a set-aside would not be necessary if the Commission elected to raise the program’s annual cap to $5 billion, thereby allowing a greater flow of dollars to Priority II after satisfying Priority I demand. Given the undocumented need for Priority II services in schools, it is unrealistic to set a figure for a set-aside within Priority II without careful analysis and assessment of school needs on a national basis and categorized according to context. For example, urban areas are likely to need greater access to Priority II services than rural schools after two years of no Priority II support and many years of support limited to applicants in the highest ranges of the discount matrix. While elementary and middle level principals agree that there is significant demand for building out internal connections as several principals noted with no funds for Priority II until now, there is no way to determine an exact set-aside that is commensurate with demand in the field. Given the challenges of NAESP members across the country, imposing any kind of cap or limit on Priority II support at this time would truly impede efforts to connect classrooms and libraries at broadband speeds unless sufficient school need can be identified. The Commission should elect to raise the E-rate program’s cap, study the disparity between Priority I and Priority II needs, and provide evidence before directing a set-aside for Priority II.
In addition, NAESP does not support the proposal to adopt a one-in-five year rule simply because this may exacerbate the problems identified by schools and libraries with the two-in-five year rule. NAESP reiterates that principals across the country cite the need for more support with internal connections, but only after they have successfully had Priority I needs met. Principals report that shifting to this phased approach would allow even fewer opportunities for schools to update and maintain connections, perpetuating the problem whereby applicants apply all at once for as much internal connections support as they project requiring during the five-year Priority II funding cycle, which is difficult for schools to do when districts are not providing resources on a consistent basis. This shift also depletes the availability of funds for applicants with lower discount rates, putting further strain on program funds in general.

NAESP is also concerned about any shift to formula-based systems (i.e., the per student, per classroom, per building or district based approaches) on which the Public Notice seeks comments. Principals believe there may be unintended negative consequences for low income and rural schools as the majority of schools rely on districts to target resources to address concentrations of poverty, such as funding mechanisms such as Title I, and the associated needs of students and schools. NAESP encourages the Commission to maintain the principles of equity following similar precedent to help the nation’s most disadvantaged students and the schools that provide services.

Finally, NAESP is concerned about the implementation of the rotation mechanism given the potential for delay in providing schools with support that is needed, particularly as the transition to online assessments moves forward. Under a rotation mechanism, streamlining the application process would become critical to give schools guaranteed timing, or assurance when needs will be met to plan accordingly. However, the rotation system does not ensure that the immediate needs of schools will in fact be met, which again, begs the question of raising the cap to meet the growing demand for both Priority I and Priority II services in a timely and consistent manner. In response to this priority raised in the Public Notice, NAESP supports a formula-based system that targets concentrations of poverty given that bandwidth is not sold on a per pupil basis and
limiting E-rate support by a formula linked to per pupil allocations could leave schools inadequate support to purchase higher bandwidth levels. Schools would only have enough money to buy what they will be able to afford with the subsidy, which may fall short of what they need. The majority principals surveyed for purposes of these comments serve in schools with 50% or higher levels of poverty and support this approach. Again, NAESP would like to emphasize our belief that raising the cap would support current and future demand for services. NAESP members report a need for both Priority I and Priority II services, as one elementary school principal explains “Schools need Priority I funding as much as Priority II funding. What good is Priority I if you do not have the infrastructure to support connectivity?”

II. Elementary and middle level principals believe the overall demand on the E-rate program must negate any efforts to provide pilot or demonstration projects in absence of an additional hike in the cap.

NAESP believes that there is too much demand on the program to allow for extraneous expenditures on pilot or demonstration projects without raising the total cap. While pilot and demonstration projects are well intentioned, these programs will redirect funds for basic services and internal connections in general. NAESP urges the Commission to make available the vast majority of the $2 billion in identified funds for Priority II services (while concurrently meeting Priority I needs). Indeed, elementary and middle level principals have expressed significant needs with Priority II and 30% of respondents support the $2 billion identified as a one-time distribution. Consistent with comments provided by EdLinc to this Public Notice, NAESP reiterates the following stipulations for dissemination:

1. No school or library buildings that received Priority II support in the past five years would be eligible to receive support from the $2 billion identified by the Commission.
2. All schools and libraries eligible after the application of (1) would be eligible to receive a share of the $2 billion identified by the Commission in the same poverty order as the current system operates.
3. In order to ensure as broad a dissemination as possible of the $2 billion identified by the Commission, each Priority II applicant eligible for a share would receive a
IV. Elementary and middle level principals are concerned about the removal of voice services from the E-rate program’s eligible service list without providing sufficient access to alternative service coverage as the phase out process moves forward.

Voice service remains critical to elementary and middle level schools and libraries across the country, especially in emergency situations. Schools overwhelmingly lack the ability for practical and legal reasons to bear the full cost of voice services themselves, and principals are still recovering from budget cuts (including staff reductions) over the past several years. NAESP urges the Commission to provide districts and schools with adequate guidance and access to alternative service lines well before the phase out process begins. Schools cannot afford to encounter abrupt disruptions and districts must be offered adequate time to prepare schools as a phase out moves forward.

Conclusion

NAESP appreciates the opportunity to comment on behalf of the nation’s elementary and middle level principals. The E-rate program continues to enjoy a viable mission and NAESP looks forward to supporting the Commission’s efforts to meet technology demands now and in the future. We thank you for your consideration of the comments submitted herein.