



## *Old Dominion Association of Church Schools*

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### **ACTION ALERT – CHURCH PRESCHOOL AUTONOMY THREATENED**

October 4, 2011

Dear Pastors and Administrators,

The Obama administration is overreaching once again, this time in an attempt to gain control over America's preschools and daycares. As with most of the President's agenda, this cause is being advanced not by legislation, but by regulations tied to federal competitive grants offered to states. The current threat to our preschools and daycares comes in the form of the third round of funding under the Race to the Top program.

Summary of the Program, Published by the U. S. Department of Education  
<http://www2.ed.gov/programs/racetothetop-earlylearningchallenge/exec-summ.pdf>

Since this link leads you to a summary that is 28 pages long, I've quoted several particular statements of concern at the end of this alert.

In addition to this attachment, you will find attached to the e-mail message a copy of my public comment before the Virginia State Board of Education on September 22, 2011. You will also find a copy of public comment offered by AACCS to the U. S. Department of Education prior to the implementation of this third round of grants.

The current status of the program can be summarized as follows.

- Congress has already authorized this program prior to the 2010 elections. We have repeatedly made our position on this issue known to all of our Virginia members and to a handful of Maryland members. However, it is highly unlikely right now that Congress can, or wants to, do anything to suspend or alter the program.
- States have until December 31, 2011, to apply for funding under this grant.
- To my knowledge, neither Governor McDonnell nor the Virginia State Board of Education has made any public statement regarding their intended response to the latest offer of Race to the Top funding. Virginia did apply for and was awarded round one funding. However, Governor McDonnell declined funding for Virginia under round two.
- **We must ask our Governor and our State Department of Education not to apply for funding under round three!** This is essentially what I requested

in my public comment on September 22. In a private, off-the-record conversation after that meeting, one of the board members gave me an indication of his sense that Virginia might not seek the funding. Nevertheless, we need to clearly voice our concerns about this issue. I have no doubt that at least some of the board members would support Virginia's application for funding under this grant. Attached you will find addresses for writing to the governor and to each member of the board. You may use my comments as a guide, and you may reference specific concerns in the Executive Summary from the U. S. Education Department.

- **Helpful links are posted on the ODACS web site.** Encourage your people to visit the Day Care Issues page.
- **We must ask the Lord to protect the freedom that we enjoy to operate church daycares that are unlicensed by the state!** ODACS was involved in a lengthy and expensive legal battle over this very issue in the 1980's. The federal government's desire for increased power now threatens to undermine the victories that God gave us about 25 years ago. We also need to understand that the current threat will not be the last one; liberal politicians and educators are determined to establish a centralized, federally controlled preschool system in the United States! Please ask your church and school family to pray about this issue!

Although we have until December 31, it would be good to submit our comments over the next few weeks. Please do this on behalf of your church and school, and please encourage others in your ministry to do the same. It would help me if you were to make me aware of your help on this issue; perhaps you could even send me a copy of the letter with your comments. Thanks in advance for taking a stand!

Sincerely,

Dan Zacharias  
Executive Director

Link

Governor McDonnell's letter to Secretary of Education Arne Duncan, refusing participation by Virginia in Round 2 of Race to the Top.

[http://www.doe.virginia.gov/school\\_finance/arra/competitive/race\\_to\\_the\\_top\\_application\\_documents/rttt\\_letter%20to\\_sec\\_duncan\\_may\\_26\\_2010.pdf](http://www.doe.virginia.gov/school_finance/arra/competitive/race_to_the_top_application_documents/rttt_letter%20to_sec_duncan_may_26_2010.pdf)

**LANGUAGE OF CONERN found in the  
RACE TO THE TOP, EARLY LEARNING CHALLENGE EXECUTIVE SUMMARY**

Page 8, Priority 1 – “The State’s application must demonstrate how it will improve the quality of Early Learning and Development Programs by...designing and implementing a common, statewide Tiered Quality Rating and Improvement System.”

*(When the government refers to a common rating system, that means that it must apply to all preschool programs!)*

Page 8, Priority 2 – “Competitive Preference Priority 2 is designed to increase the number of children from birth to kindergarten entry who are participating in programs that are governed by the State’s licensing system and quality standards, with the goal that all licensed or State-regulated programs will participate.”

*(This brings up two points of concern. First, the federal government wants to reach children from birth to age five; the preschool plank of President Obama’s campaign was called Zero to Five! Second, the term “State-regulated programs” is intended to include all non-licensed programs, including those operating under a religious exemption from licensure!)*

Page 8, Priority 3 – “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...”

*(Again, this is more indication that the federal government seeks far-reaching control over early child care.)*

Page 9, Priority 4 – “Enhancing the State’s current standards for kindergarten through grade 3 to align them with the Early Learning and Development Standards across all Essential Domains of School Readiness.”

*(The federal government seeks to use Race to the Top to establish national learning standards for all preschool students.)*

Page 18, Section (D)(2)(a) – “Develop a common, statewide Workforce Knowledge and Competency Framework designed to promote children’s learning and development and improve child outcomes.”

*(The federal government seeks control of the qualification requirements for all preschool and daycare workers!)*

Page 22, Definitions – “Early Learning and Development Program means any (a) State-licensed or State-regulated program or provider, regardless of setting or funding source, that provides early care and education for children from birth to kindergarten entry, including, but not limited to, any program operated by a child care center or in a family child care home;”

*(The definition of a preschool/daycare program is clearly intended to include all public, private, and religious daycares!)*