



March 15, 2024

Geraldine Valentino-Smith
Director, Defense-State Liaison Office (DSLO)
Office of the Deputy Assistant Secretary of Defense
Military Community and Family Policy

Dear Ms. Valentino-Smith,

The Military Interstate Children's Compact Commission's (MIC3) Executive Committee appreciated the opportunity to review the Clearinghouse for Military Family Readiness at Penn State Study, *State Implementation of Four Initiatives to Support Military-Connected Students*, with representatives from the research team on 11 January 2024. Based on a review of the study and feedback from member states, the Executive Committee offers the following comments regarding the Interstate Compact on Educational Opportunity for Military Children (ICEOMC) review.

Prior to and during our 11 January meeting, the Executive Committee was informed the report was embargoed, and the understanding was your agency desired the feedback prior to the report's release. We regret we were not notified the report had already been released publicly. Had we been notified of the report's imminent release, the Committee would have expedited our response to your team.

Of significant concern of the Executive Committee is the report's inability to identify or adequately address the Compact Rules. The role of the Compact Rules is to clarify general applicability, implement, interpret, or prescribe a policy or provision of the Compact, and enforce the implementation of the Compact statute. As outlined in the Model Compact Language (MCL), Article X *Powers and Duties of the Interstate Commission*, Commission Rules "shall have the force and effect of statutory law and shall be binding in the Compact states to the extent and in the manner provided in this compact." By not addressing the Rules in the report, the research team omitted a significant component of the application and implementation of the Compact statute. While the report was commissioned as part of the National Defense Reauthorization Act (NDAA) and focuses on Department of Defense (DoD) initiatives, the Compact statute supports multiple federal departments, hence the importance of the Compact Rules. Table 6 – *Enforcement* (page 16) provides, "The Commission will enforce the provisions and rules." However, this is the only indication within the report that the Commission promulgates Rules or must enforce the Rules.

In addition to the above, the Executive Committee shared these general comments:

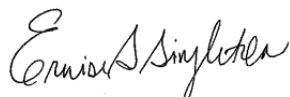
- The methodology of the research requires clarification. Neither the overall timeframe during which research was conducted nor the timeline each phase of research encompasses was provided. While there was a data collection cut-off, the report should acknowledge some states initiative action to address DoD priorities or concerns were pending final passage within state legislatures. However, by not providing the timeframe, the subject of the policy initiative cannot accurately address inquiries from stakeholders within their state or the District of Columbia (DC).
- The report's Executive Summary and Introduction state the research team examined state and DC-level implementation of four state/DC-level policy initiatives that are intended to support military-connected students (page 10); however, the layout of the report gives the impression

- that the non-Compact related programs have a direct impact on Compact compliance and implementation.
- The report states that Clearinghouse researchers reviewed five Compact articles. This implies a level of understanding regarding compact law that the Clearinghouse researcher may or may not possess. The final paragraph on page 14 simply states, “Understanding legalese and broad state statutes is beyond the scope of this project.” The lack of legal review should be emphasized to provide context to the information presented within the report, specifically when the report makes determinations regarding each state’s/DC’s Compact statute.
 - The report contains inaccurate information on the development of the ICEOMC and the formation of the MIC3. The report states (page 14), “The MIC3 provided model language for the states/DC (MIC3, n.d.-b).” This is incorrect. The Department of Defense (DoD) provided funding to develop the Compact. The model language was developed by the DoD, through the Defense-State Liaison Office (DSLO), in collaboration with the Council of State Governments in 2006. Once the model language was finalized by the DSLO, they secured bill sponsors in states. State compact bill variances from the model language were reviewed and approved by the DSLO office and general counsel prior to final adoption by states. The Commission was not activated until the first 11 states joined in 2008, and the Commission was formally established later that year.

While the Compact does not address every education-related issue a military family may encounter, the MIC3 appreciates the opportunity to provide feedback, and shares your commitment to military students through successful education transitions between public and U.S. Department of Defense Education Activity schools.

The Executive Committee welcomes further discussion and collaboration regarding strengthening support for military families. Should you have any questions, please feel free to contact me by email at ernise.singleton@la.gov or by phone at (225) 342-3427.

Sincerely yours,



Dr. Ernise Singleton
Chairman and Louisiana Commissioner

c: Executive Committee
Dianna Ganote, Military Representative, Department of Defense