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ASSOCIATION OF  
SCHOOL BUSINESS OFFICIALS  
INTERNATIONAL

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February 24, 2020

Director of the Strategic Collections and Clearance Governance and Strategy Division  
U.S. Department of Education  
400 Maryland Avenue SW  
LBJ, Room 6W-208B  
Washington, DC 20202-4537

Re: Docket Number: ED-2019-ICCD-0160, Agency Information Collection Activities; Comment Request;  
Study of District and School Uses of Federal Education Funds

Dear Director,

On behalf of AASA, The School Superintendents Association, which represents 13,000 school system leaders and the Association of School Business Officials International (ASBO), an educational association that represents more than 30,000 school business professionals, we write to offer comments on the proposed study of the use of federal education funds by districts and schools.

First, we want to applaud the Department for undertaking this serious and important work. Updating this data, some of which has not been collected since 2004, provides critical information on the use of how federal funding and programs currently support student learning and how funding streams and programs can be improved to ensure a better return on investment.

Second, while we believe the questions that the Department plans to ask are generally very comprehensive, we think there could be additional data collected that would be helpful to the Department, school district leaders and policymakers.

- Data on State set-asides in Title I, Title II, Title III, Title IV, Title V and IDEA : While we understand the Department is intentionally targeting district and school-level leaders we believe it would be a mis-step to not take the time to better understand how states are spending their funding, how their resources are being directed to better serve specific subgroups of students, how their funding is being leveraged to address the under-performance of schools and districts and how the portion of their funding that is being used for salaries.
- Data on Title IV of ESSA: While there are no requirements for states or districts to report on the use of funds under Title IV-A we believe that the collection of this information is critical to determining the effectiveness of this new grant program. Specifically, we recommend the Department ask if Title-IV-A Dollars are being combined with other federal funding streams or transferred to a different Title. We would also like to know more about the breakdown of the district and state allocation for funding under Title IV and how dollars are being divided between the three funding options: increasing access to well-rounded curriculum, supporting safe and healthy students, and increasing the effective use of technology.

- Rationale for moving funding: It would be helpful to know what motivates districts to exercise funding flexibility across multiple federal programs or to utilize the flexibility under ESSA to redirect resources from one Title program into another.
- Data on the REAP Program: While the Department indicated that they would remain focused on Title I-IV of ESSA, we would strongly encourage them to include a few questions on spending related to the Rural Education Achievement Program. Of particular interest would be knowing how REAP funds are used to support instruction, student support and program administration, salaries for teachers, aids, and other staff as well as how much is used for specific types of programs and services. We would also want to know what share of the funding is allocated for professional development activities and how these activities are directed at school personnel.

Thank you for commencing this important work. We hope you consider our suggested feedback and you finalize this collection.

Sincerely,



Sasha Pudelski  
Advocacy Director