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