

## **Study of District and School Uses of Federal Education Funds**

Institute of Education Sciences (IES) Response to Public Comments Submitted as of February 24, 2020

March 10, 2020

### **Introduction**

We appreciate the time that many organizations and individuals took to provide detailed comments and suggestions for IES' Study of District and School Uses of Federal Education Funds. We also appreciate the support expressed by many of the commenters for the goals and design of the study.

We have tried to incorporate the suggestions of commenters wherever possible, while also balancing the desire for detailed information about the uses of federal program funds against the need to limit the burden, cost, and complexity of the study. Commenters often urged us to add additional components to the study (e.g., additional programs, additional research questions, and additional types of data collection and analysis), but in many cases this expansion of the scope of the study is not feasible at this time. In addition, we are conscious of the time that educators must spend responding to federal surveys and other types of data collection, and we are actively seeking ways to minimize the burden on respondents while maximizing the usefulness of the information collected.

Some of the suggestions made by commenters pertained to specific content for the surveys and other data collection instruments; we are carefully considering those suggestions as we develop and refine the study instruments, which will be shared for public comment through a second OMB clearance request later this year.

Below we summarize the public comments that were submitted, by topic, and provide responses to the issues and suggestions for each of those topics.

#### **1. Use and dissemination of the data (7 commenters)**

Three commenters said the study should be constructed and conducted without the intent to use the findings to justify program consolidation or deep cuts to federal education spending. Three commenters said the study should not be with a bias towards increasing flexibility and reducing program requirements. One commenter said the Department should widely distribute the study results to education researchers, practitioners, and policymakers.

Response: The Institute of Education Sciences (IES) is the nation's leading source for rigorous, independent education research, evaluation, and statistics. We will conduct this study in an unbiased manner just as we conduct all of our studies. This study is similar to cross-cutting studies of federal resources that the Department has conducted in the past. The reports for the study will be made publicly available on the IES website.

#### **2. Additional research questions (5 commenters)**

Five commenters suggested additional research questions that could be added to the study, including the following:

- **School improvement**: What is the distribution of Section 1003 funds between schools identified for comprehensive support and improvement, targeted support and improvement, and

additional targeted support? What are the average and median award sizes for schools in each of these categories in each state? Are states setting aside the full 7% required under Section 1003, or are states utilizing less than this amount pursuant to the special rule described under Section 1003(h)? What share of total expenditures on school improvement for schools identified for comprehensive or targeted support and improvement are provided through the Title I-A set-aside for school improvement?

- **Evidence-based decision making:** How do districts ensure that spending decisions are evidence-based?
- **Use of funds:** How are districts leveraging federal education dollars to improve state and local spending decisions? How do districts ensure that federal funds are used to support the intended beneficiaries, while not segregating students based on family income, EL status, or disability status?
- **Federal guidance and technical support:** What federal technical support and guidance do districts need to help improve spending decisions at the district and school levels?
- **Needs assessments:** How do needs assessments look at whole-child supports? How are needs assessments used in making spending decisions?

Response: We expect that the study will be able to address some of the proposed questions regarding Section 1003 funding for school improvement, including the distribution and sizes of those grants, and we have added more detailed research questions in that area (see Part A, Exhibit 2, row 2h). However, the study will not be able to determine the total amount of expenditures on school improvement from all sources (including state/local funds), because there is not necessarily a clear dividing line between activities that are specific to school improvement and those that are more broadly focused on providing high-quality instruction and other services.

This study will not be collecting information about decision-making regarding the uses of Title I funds because the study resources will be focused on providing as detailed as possible a description of how the funds are used. Therefore, the study will not be able to address questions about whether spending decisions are evidence-based or based on needs assessments or about specific needs for federal guidance and technical support.

Two commenters suggested replacing the research question regarding how districts and states use funding from multiple programs for similar or interrelated purposes with the following: How are districts and schools leveraging funding from different federal programs to meet the needs of students?

Response: We agree that the proposed wording is better and we have made this change.

### 3. Add additional programs to the study (4 commenters)

Four commenters asked that additional programs be added to the study, including the Perkins Career and Technical Education program, the Full-Service Community Schools program under Title IV-F, Rural Education Achievement Program (REAP), IDEA Part C, Head Start and Early Head Start, Medicaid, Children's Health Insurance Program (CHIP), and the National School Lunch Program.

Response: We appreciate the desire to learn about other programs that provide important support to schools and districts; however, as noted above, we must balance that against the need to limit the burden, cost, and complexity of the study. We chose to focus this study on large programs administered by the U.S. Department of Education that provide funding to a large proportion of the nation's districts and schools. Note that IES also has a separate study of the Perkins Career and Technical Education program underway that can examine similar issues for that program. Although the study is not examining the uses of funds provided through the Rural Education Achievement Program, we are planning to include REAP in the specific data collection on funding transfers between programs.

#### **4. Add a survey of states (4 commenters)**

Three commenters said the study should collect information from states about how they are using set-aside funds, including the use of such funds to serve specific student subgroups and help to strengthen school leaders.

Response: We appreciate the importance of understanding the uses of funds at the state level as well as the district and school levels, and we will consider the possible addition of a state survey as we develop and refine the data collection instruments, which will be shared for public comment through a second OMB clearance request for this study later this year. Note that IES also has individual program studies of Titles I and II, Title III, and Title IV that will also collect data in the 2020-21 school year, and we are considering which studies are the most appropriate vehicles for examining state-level uses of funds.

#### **5. Sample design (3 commenters)**

Two commenters said the national samples of districts and schools should be representative of student racial and ethnic diversity and family income levels, and that the case study sites should also reflect diversity on these characteristics. One of those commenters also asked that the samples represent variation in the percentage of students who are English learners and those who have disabilities. A third commenter asked that the sample include districts where the Department of Justice or the Department of Education have pending cases on discrimination claims based on race, national origin, or disability in order to examine whether districts are utilizing federal funds in a nondiscriminatory manner.

Response: We have revised the sampling framework to include stratification by district poverty rate, based on Census data (instead of stratifying by per-student funding level). Although we are not stratifying the district sample by racial/ethnic composition or percentage of EL students, we believe the school sample is sufficiently large to permit the reporting of study data by those characteristics. The study will not be able to examine whether districts are using federal funds in a discriminatory manner because we are not collecting student-level information.

For the case study sample, we will seek to purposively select the districts and schools to provide diversity in the percentages of students who are from low-income families, English learners, and have disabilities, as well as to provide variation in racial/ethnic composition.

#### **6. Concerns about burden and duplication (2 commenters)**

Two commenters expressed concern that the study would be burdensome and duplicative of other data collections such as the recent NCES study of the Title I formula. One commenter said the study would be

particularly burdensome on large city and urban fringe districts because they are often the target of monitoring, evaluation, auditing, and other studies. This commenter suggested either (a) eliminating the nationally representative sample and instead quadrupling the number of on-site case studies, in order to better determine the “value added” of the federal funds, or (b) reallocating the study funds to replicate the 2004 Special Education Expenditure Project (SEEP) to provide updated information on special education costs.

Response: We do not agree that this study will duplicate other recent or ongoing studies. The most recent cross-cutting study of resource allocation under federal education programs was completed in 2009 based on data collected for the 2004-05 school year. Those data are now at least 14 years old; moreover, they reflect programs and provisions that existed prior to the 2016 reauthorization of ESEA and do not include programs authorized under IDEA. The most recent large-scale study of special education expenditures (SEEP) is also now very dated. In addition, the NCES Title I formula study was focused more narrowly on just the mathematical formulas for one of the five programs included in the resource allocation study.

We also note that most of the other commenters, including organizations that represent district administrators, principals, and teachers, were generally very supportive of the study and indeed often urged us to add additional components to the study (e.g., additional programs, additional research questions, and additional types of data collection and analysis).

## **7. Title IV, Part A (8 commenters)**

Three commenters urged that the study collect specific information about uses of Title IV, Part A funds. Two of these commenters suggested offering survey respondents many choices to select from, and suggested a number of specific survey questions for consideration. These two commenters also recommended that data collection on the uses of Title IV-A funds be done annually, as for Title II-A. Another commenter emphasized the need to examine how Title IV funds are being combined with other federal funds or transferred to a different Title.

Two commenters asked that the study examine the extent to which districts with high disciplinary rates are using Title IV funds to support positive school climates, including through mentoring and school counseling and schoolwide positive behavioral interventions and supports. One of these commenters also asked that the study examine how such districts are using Title IV funds to reduce exclusionary disciplinary practices.

Response: A key purpose of this study is to obtain detailed information about how districts and schools are using funds across the five programs, including Title IV, Part A, including the extent to which the funds are transferred between federal programs or combined or coordinated with other federal funds. We will carefully consider the suggestions about specific survey questions as we develop and refine the data collection instruments, which will be shared for public comment through a second OMB clearance request for this study later this year.

Although we do not anticipate that the study will have the resources to examine the uses of funds in districts with high disciplinary rates, we do expect to examine the use of Title IV funds to support positive school climates, including positive behavioral interventions and supports. The question of whether funds are used in a manner that supports innovation is more subjective, but we may be able to explore this issue through the case studies.

Although this is a one-time study, the study results may inform future consideration of the frequency for collecting data on the uses of Title IV-A and other federal program funds.

One commenter asked the study team to be aware that some Title IV uses of funds may cut across the three buckets. The commenter asked that the survey include a response option allowing districts to explain “other” uses, and that it examine how funds are being used at the district and school levels in a manner that supports innovation. This commenter also said the study reports should not conflate the amount expended with the true cost of a program and should take into account that small influxes of funds can be leveraged to bring in community partners, such that the funds a district or school commits to an activity do not represent the full accounting.

Response: We are aware that some uses of Title IV funds may cut across the three “buckets” described in the law, and will seek to balance that issue with the need to provide information about the share of funds used for those broad categories as well as the share used for more specific practices that may sometimes cut across those categories.

We also understand that district funding for some programs may understate the full cost of the program when some of the resources are provided by other community partners, which may be particularly relevant for programs that take place outside the regular school day, and we will be careful to avoid implying that district expenditures are always the same as total program costs.

#### **8. Title II, Part A; teachers and leaders (6 commenters)**

Four commenters asked that the study include a particular focus on the use of federal funds to strengthen the skills of school leadership, including the use of Title II’s 3 percent state set-aside for this purpose, as well as the specific kinds of professional learning that are supported. One of these commenters asked that the study examine not only development of school principals but also about investments in teacher leaders and principal supervisors. Three of the commenters suggested specific questions that could be included in the surveys. A fifth commenter asked that the study examine extent to which school districts have a diverse pool of qualified teachers and school leaders and the extent to which Title II funds are used to increase the diversity of the teaching workforce. A sixth commenter asked for the study to examine the extent to which Title II funds are used to support professional development on preventive and positive approaches to student discipline.

Response: Obtaining detailed information about the use of Title II and other funds to strengthen the skills of both teachers and leaders is a key goal for this study. We appreciate the suggestions that commenters provided in this area (including suggestions for specific survey questions), and we will carefully consider these as we develop and refine the data collection instruments, which will be shared for public comment through a second OMB clearance request for this study later this year.

#### **9. Equity (5 commenters)**

Two commenters said that in addition to examining the distribution of funds by district and school poverty and urbanicity, the study should also examine this by racial-ethnic composition, percentage of EL students, and percentage of students with disabilities.

Response: We anticipate that the most detailed analyses of funding equity will be conducted at the school level, where we expect the study will be able to examine the distribution of funds among schools in relation to poverty level, urbanicity, racial-ethnic composition, percentage of EL students,

and percentage of students with disabilities. We also plan to examine the distribution of funds among districts by poverty level and other demographic characteristics to the extent feasible.

Four commenters recommended that this study examine equity in access to educational resources for students who are typically underserved, or who have special circumstances such as being placed in juvenile justice residential facilities or in restraint and seclusion. Commenters also suggested that the study consider how funds support underserved students to access advanced coursework or how funds are used to provide supports for parents who require translation or who have disabilities. One commenter suggested that the study identify not only how much, but how well funds are used to provide opportunities for historically underserved communities. One commenter asked that the study examine how do districts ensure that federal funds are used to support the intended beneficiaries, while not segregating students based on family income, EL status, or disability status.

Response: Equity in access to educational resources is an important focus of this study, which is intended to provide descriptive information about the distribution of funds across districts and schools with varying demographic profiles, as well as variation in how the funds are used across different groups of districts and schools. However, the study is not collecting data at the student level or for agencies outside of school districts such as juvenile justice facilities. Also, the study is focused on quantifying the amounts of resources and services provided in various areas but will not be able to draw conclusions about the quality or effectiveness of those services.

Examination of how districts avoid segregating students based on family income, EL status, or disability status is beyond the scope of this study.

#### **10. Parents and communities (5 commenters)**

Five commenters indicated a need for this study to include parent and community perspectives, particularly around how their voices contribute to funding decisions.

Response: We agree that any examination of how districts and schools make decisions about how to use their resources should consider the role of parent and community input in those decisions. However, for this study we chose not to collect information about decision-making processes in order to focus the limited resources for this study on providing as detailed as possible a description of how the funds are used. We do expect the study to be able to describe the amount of funds used to support parent engagement.

#### **11. Flexibility (4 commenters)**

Four commenters made suggestions related to ensuring the study captures how schools and districts are using flexibility. Commenters recommended including a description of existing flexibilities in study instruments, and to use this study to examine motivation for using flexibility, effective use of flexibility to improve student outcomes, and to investigate how districts and schools are using funds to reach intended students.

Response: The use of flexibility is an important issue that will be addressed in this study. We will take these comments into consideration as we develop surveys and interview protocols. The study will collect data from districts and schools about the proportion of federal funds transferred across programs. The study will also investigate the perceived barriers to exercising flexibility provisions. Case studies will be used to highlight examples of ways in which districts and schools use flexibility.

This study does not, however, include student-level data or student outcomes and an investigation of best practices in using flexibility to improve student outcomes is beyond the scope of this study.

## **12. Secondary schools (2 commenters)**

One commenter said the study should examine the degree to which federal funds are expended to support middle and high schools, and extent to which districts use the flexibility in Section 1113 when allocating funds to schools.

Response: The study will include analysis comparing funding levels and uses of funds in elementary schools, middle schools, and high schools. We also plan to examine how funds are allocated schools, including the use of the flexibility in Section 1113.

One commenter asked that the study examine the use of federal funds for college in high school programs such as dual enrollment, concurrent enrollment, and early college high school program, as well as outcomes and best practices for college in high school programs.

Response: IES is currently designing several program implementation studies that will, collectively, shed light on this issue. In addition to the Study of District and School Uses of Federal Education Funds, IES is conducting studies of Titles I-A, II-A, and IV-A of the Every Student Succeeds Act (ESSA), as well as the Perkins Career and Technical Education Act. ESSA Title IV-A and the Perkins Act, in particular, highlight dual enrollment as a promising strategy and allowable activity for federal funds. We expect to include questions about college in high school programs such as dual enrollment in one or more of these studies. We are currently in the process of developing surveys and other data collection instruments for these studies, and will take these comments into consideration as we develop those instruments. However, examination of outcomes and best practices are beyond the scope of these studies, because they are focused on describing the uses of funds and program implementation across a diverse set of federal programs.

## **13. Early childhood education (2 commenters)**

Two commenters noted the importance of investigating the use of funds for younger students and to support early learning initiatives.

Response: The study will seek to obtain information on the share of funds from each program that are allocated to early learning, including preschool and kindergarten programs, to the extent feasible.

## **14. Special education (1 commenter)**

One commenter recommended that the study examine the use of IDEA and general education funds to provide Specialized Instructional Support Personnel (SISP) and related services personnel. The commenter also asked that the study be designed to determine the percentage of IEP students that receive OT and other related services, the types of services the OT practitioners are providing, and the extent to which schools are using contracted services vs. directly employing personnel.

Response: A key goal of this study is to reliably and validly describe how funds are allocated and utilized for services for special education students. To that end, the study will collect data on the

numbers of various types of staff (in the form of FTE) that are supported through IDEA, other federal funds, and state and local funds, as well as estimating the amounts of these funds spent on various types of services and resources. However, the level of detail that can be reported for the nationally representative sample on specific subsets of service provider types (such as OT practitioners) may be affected for the variation in accounting and personnel codes used by different states. Also, connecting resources to individual students receiving these services is beyond the scope of this study.

#### **15. Comparative analysis across programs (1 commenter)**

One commenter said the plan for a comparative analysis across funding streams should be removed from the study.

Response: We believe it will be useful for practitioners and policymakers to see how the uses of federal funds vary between programs as well as within programs. However, this type of comparison will be done in a purely descriptive way and is not intended to support inferences about whether one program's uses of funds are better or worse than another's.

#### **16. Homeless students (1 commenter)**

One commenter said the study should examine the use of Title I, Part A funds for homeless students, including the amount of these funds that districts reserve for homeless students and a description of those services.

Response: As the commenter alluded to, school districts are required under Section 1113(c)(3) to reserve such funds as are necessary to provide services to homeless children and youth. The study is intended to obtain information on the amounts of funds reserved for this as well as funds reserved for other purposes specified in the law (i.e., neglected and delinquent children, financial incentives to attract and retain effective teachers, and early childhood education programs).

#### **17. Supplement, not supplant (5 commenters)**

Four commenters said the study should examine how districts are complying with the supplement, not supplant requirements and ensuring that they provide at least as much state and local funding to high-poverty schools as to low-poverty schools. Two of these commenters expressed concern that the current research question about the supplement-not-supplant requirement "invites only criticism of this requirement" and suggested a different research question about how districts comply with the requirement. A fifth commenter questioned the proposed analysis of school-level expenditures, arguing that they are "overwhelmingly driven by staff salaries without the appropriate context of salary differentials contained in the typical districtwide salary structure."

Response: We plan to retain the analysis of school-level expenditure data to examine the extent to which districts provide at least as much state and local funding to Title I schools and higher-poverty schools as to non-Title I schools and lower-poverty schools – an approach that was supported by four of the five commenters on this topic. We replaced the research question about how the supplement, not supplant requirements affect how districts and schools use federal funds (4c) with a new question about how districts are addressing the revised requirements for ensuring that Title I funds supplement, not supplant the state and local funds provided to schools (1j).



