

Response to Public Comments Received During the 60-day Comment Period

June 2021

Common Core of Data (CCD) School-Level Finance Survey (SLFS) 2021-2023

ED-2021-SCC-0066

Comments on FR Doc # 2021-08847

Submitter Information

Name: Jesse Hahnel

Organization: National Center for Youth Law

Comment

Dear Director Schneider and Commissioner Woodworth:

Thank you for the opportunity to provide comments regarding the School-Level Finance Survey (SLFS). The National Center for Youth Law (NCYL) applauds the decision of the National Center for Education Statistics (NCES) to seek to extend this critical information collection for another three fiscal years. We urge you to go one step further and require universal participation in the SLFS by all states (and the District of Columbia and Puerto Rico), rather than continuing to make the SLFS a voluntary collection.

NCYL is a non-profit law firm that has worked to improve the lives of low-income children and youth for over four decades. We coordinate campaigns that weave together research, public awareness, policy development, technical assistance and litigation when necessary, to ensure the systems designed to support at-risk children do so effectively. Educational resource equity is a longstanding priority of NCYL, and we appreciate the opportunity to offer our perspective as advocates for marginalized students and their families, including students who are low-income, of color, have a disability, or speak English as a second language.

In our experience, it is critical to know where education dollars – federal, state, and local – are being spent. More money leads to better outcomes, especially if spent well and in schools serving students with the highest needs.¹

School-level finance data are crucial to measuring how school-level education resources are distributed across and within school districts. Over the past decade, researchers have begun to document significant funding disparities between schools within the same district (intra-district inequities). They have found that it is not uncommon for schools enrolling students from more affluent, whiter, families to receive equal, or even greater, amounts of resources than schools enrolling students of color and students from poorer families, although the needs of the latter are far greater.²

These intra-district disparities can sometimes be larger than inter-district disparities and are often of greater concern to local communities and parents, who witness these funding disparities, and the consequences of

¹ C. Kirabo Jackson, “Does School Spending Matter? The New Literature on an Old Question” in *An Equal Start: Policy and Practice to Promote Equality of Opportunity for Children* (2020), https://works.bepress.com/c_kirabo_jackson/38/; Linda Darling-Hammond, Learning Policy Institute, *Investing in Student Success: Lessons from State School Finance Reforms 6-7* (Apr. 2019), http://learningpolicyinstitute.org/sites/default/files/product-files/Investing_Student_Success_REPORT.pdf

² See, e.g., Kristen Murray, *The Problem of Intradistrict Inequality*, 5 *Belmont L. Rev.* 85 (2018), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3240746; Lauren Webb, *Educational Opportunity for All: Reducing Intradistrict Funding Disparities*, 92 *NYU L. Rev.* 2169 (2017), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3103200; Kenneth Shores & Simon Ejdemyr, *Pulling Back the Curtain: Intra-District School Spending Inequality and Its Correlates*, at 21 (2017), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3009775.

these disparities, firsthand. These disparities, and their adverse correlation with race and income, are unjust and undermine the mandate of equality of opportunity that underlies both the Civil Rights Act of 1964 and the Elementary and Secondary Education Act of 1965 (ESEA).

Collecting and reporting reliable and unbiased school-level finance data for all schools in the country is critical to detecting and remedying these disparities. This is not a partisan issue. Indeed, former-Secretary DeVos explained that data about “funding at the building level” is the kind of “actionable information” that parents can and should use “to advocate for reforms,” and used departmental resources to collect and publish publicly-available school-level finance data at StudentSpending.ed.gov.³

Because of the SLFS items’ intentional alignment with the per-pupil expenditure items required to be published about schools and school districts in their Every Student Succeeds Act (ESSA) report cards,⁴ requiring universal participation in the SLFS will result in very little additional reporting burden.⁵ In addition, requiring universal participation will promote higher data quality for the school finance elements of the report cards required by ESSA because of the technical support provided by NCES and the Census Bureau.⁶ Requiring universal participation in the SLFS – with further federal guidance, definitions, training and technical assistance, as appropriate – will also permit more accurate inter-state comparisons of school-level spending.⁷

We recognize that universal participation is achieved for the National Public Education Financial Survey and the School District Finance Survey (F-33) without legal mandate, but that is apparently because the data collected there is critical to the states receiving their full allocation of funds under Title I and other federal grant programs. We are aware of no similar financial incentive for participating in the SLFS. To the contrary, NCES reports that only 30 states have said they intend to voluntarily participate in the SLFS for some or all of their schools.⁸ That is certainly many more than in past years, but we are concerned about the lack of quality, publicly-available, and comparable information from the other 20 states and the District of Columbia and Puerto Rico – both of which are considered states for purposes of the ESSA report card requirements.⁹ It would promote equity and data quality to require all states to participate in the SLFS.

³ U.S. Department of Education, Press Release (Sept. 16, 2020), <https://www.eseanetwork.org/news-and-resources/blogs/used/ed-launches-new-web-tool-with-federal-state-and-local-per-pupil-expenditure-data>.

⁴ 20 U.S.C. § 6301(h)(1)(C)(x) (requiring states to produce report cards that include “per-pupil expenditures of Federal, State, and local funds, including actual personnel expenditures and actual non-personnel expenditures of Federal, State, and local funds, disaggregated by source of funds, for each local educational agency and each school in the State for the preceding fiscal year”); Supporting Statement Part A at 5 (Apr. 2021) (“variables have been added to make the SLFS directly analogous to the F-33 Survey and to the Every Student Succeeds Act (ESSA) provisions on reporting expenditures per-pupil at the LEA and school-level”), https://downloads.regulations.gov/ED-2021-SCC-0066-0002/attachment_1.pdf.

⁵ See Supporting Statement Part A at 7 (“The SLFS reporting burden on SEAs is expected to be reduced given that SEAs are currently reporting total current expenditures at the state level on NPEFS and at the district level on F-33 and are now also obligated by law to report expenditures per pupil at the school level.”); *id.* at 11 (“There are no additional recordkeeping costs to the responding SEAs beyond their time to respond. All SLFS data are extracted from administrative record systems already collected by the state for its own purposes and are of the type and scope normally included in government records. The added burden for SLFS is limited to the SEA’s effort taken in extracting data from files, transferring them to NCES, and responding to edit reports.”); *id.* (estimating a maximum total burden time cost to all states, if all states participated, of \$189,491).

⁶ See Supporting Statement Part A at 3 (“Technical help from NCES and Census will likely improve data quality at school level”); Supporting Statement Part B and C, at 2-3 (Apr. 2021) (describing comprehensive review and technical assistance), https://downloads.regulations.gov/ED-2021-SCC-0066-0002/attachment_2.pdf.

⁷ See Supporting Statement A at 6.

⁸ See Supporting Statement B and C at 2.

⁹ See 20 U.S.C. § 6332(e).

We believe NCES has the authority to make this collection mandatory. The Department has previously relied on 20 U.S.C. §§ 1221e-3, 1231a, and 3474, either individually or in various combinations, to require various disclosures by recipients of federal funds even when not specifically required by the underlying grant program, and courts have sustained those requirements.¹⁰

Second, and perhaps more appropriate given the importance these data have to civil rights compliance and enforcement, NCES could require participation in the SLFS in reliance on the Office for Civil Rights' (OCR's) mandatory data collection authority.¹¹ This approach would be consistent with NCES's past practice. For 45 years, NCES has relied on OCR's authority to require colleges and universities to report certain student data.¹² Similarly, almost 30 years ago, NCES took over administration of the EEO-6 collection of employment data in higher education, and continues to collect that data and make them available to the Equal Employment Opportunity Commission (to enforce Title VII of the Civil Rights Act) and OCR (to enforce Title VI of the Civil Rights Act and Title IX of the Education Amendments of 1972).¹³ There is no reason why NCES could not, with OCR's agreement, use that same authority to mandate universal participation in the SLFS.

Regardless of what authority NCES relies on to require universal participation in the SLFS, we urge NCES to work closely with OCR on this data collection. It is critical that the school finance information reported is made available as quickly as possible to OCR for enforcement purposes and that the information is integrated into the public-facing Civil Rights Data Collection dataset and website, so that it can be accessed by parents, communities, and advocates along with other measures of school equity.

Should you have any questions or wish further input, please contact Miriam Rollins at mrollin@youthlaw.org.

Sincerely,

Jesse Hahnel
Executive Director
National Center for Youth Law

cc: Suzanne Goldberg, Acting Assistant Secretary, Office for Civil Rights
Monique Dixon, Deputy Assistant Secretary for Policy, Office for Civil Rights

RESPONSE:

¹⁰ See, e.g., *Ass'n of Priv. Sector Colleges & Universities v. Duncan*, 110 F. Supp. 3d 176 (D.D.C. 2015), *aff'd*, 640 F. App'x 5 (D.C. Cir. 2016); *Ass'n of Private Sector Colls. & Univs. v. Duncan*, 870 F. Supp.2d 133 (D.D.C. 2012).

¹¹ See 20 U.S.C. § 3413(c)(1) (authorizing OCR "to collect or coordinate the collection of data necessary to ensure compliance with civil rights laws within the jurisdiction of the Office for Civil Rights"). In addition, OCR has adopted regulations that require recipients of federal financial assistance to provide information upon request. See 34 C.F.R. §§ 100.6(b), 106.71, 104.61.

¹² See NCES, *NCES Handbook of Survey Methods: Integrated Postsecondary Education Data System (IPEDS)*, at 1-2 (updated Apr. 2019) ("The U.S. Department of Education's Office for Civil Rights (OCR) has collaborated with NCES since 1976 on the collection of data from postsecondary institutions through compliance reports from postsecondary institutions mandated pursuant to Title VI of the Civil Rights Act of 1964, first through HEGIS and then through IPEDS.") <https://nces.ed.gov/StatProg/handbook/pdf/ipeds.pdf>; see *id.* at 3, 5 (noting OCR's "support" to collect disaggregated data in higher education).

¹³ NCES, *IPEDS 2020-21 Data Collection System Survey Materials: Human Resources: FAQ (Question 8)*, <https://surveys.nces.ed.gov/ipeds/public/survey-materials/faq?faqid=2>; NCES, *History and Origins of Survey Items for the Integrated Postsecondary Education Data System*, at 8 n.5, HR-1 (March 2018, 2016-17 update), https://nces.ed.gov/ipeds/pdf/NPEC/data/NPEC_Paper_IPEDS_History_and_Origins_2018.pdf; see also 29 C.F.R. § 1602.48.

Thank you for your feedback posted on June 23, 2021, responding to a request for comments on the School-Level Finance Survey (SLFS) 2021-2023 published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in the SLFS. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made. We are grateful for this process and your comment.

The SLFS is entirely consistent with the Every Student Succeeds Act (ESSA) report card requirement that current expenditures per pupil be reported at the school level. The SLFS instructions and data items definitions are consistent with the reporting current expenditures per pupil provision set forth in ESSA.

The U.S. Department of Education guidance on the ESSA report cards indicates that State Education Agencies (SEAs) and Local Education Agencies (LEAs) can reduce their burden in reporting school-level finance data by utilizing NCES data collection procedures. The guidance states that, “To reduce burden, an SEA and its LEAs have the flexibility to align their procedures with existing NCES data collection procedures and to work closely with LEAs when developing guidance on how to calculate per-pupil expenditures.” See OPPORTUNITIES AND RESPONSIBILITIES FOR STATE AND LOCAL REPORT CARDS UNDER THE ELEMENTARY AND SECONDARY EDUCATION ACT OF 1965, AS AMENDED BY THE EVERY STUDENT SUCCEEDS ACT; pg. 39.

<https://www2.ed.gov/policy/elsec/leg/essa/report-card-guidance-final.pdf>

Furthermore, the SLFS school-level expenditure data items are directly analogous to the expenditure data items set forth in the School District Finance Survey (F-33). The SLFS instructions and data items definitions are also consistent with the F-33 survey. Commencing with the FY 18 data collection, the SLFS was aligned with the F-33 survey to facilitate the reporting of all current expenditures at the school level. The items collected for current expenditures on SLFS exactly match the current expenditure items on F-33 (Part II of the F-33 survey form). The SLFS also contains a group of exhibit items, several of which exactly match exhibit items from the F-33 survey.

Participation in the SLFS provides the researchers the opportunity to make comparisons of school-level spending districts within and across districts as data items that comprise current expenditures are consistent across all SEAs and LEAs. While the U.S. Department of Education guidance on the ESSA report cards indicates that an SEA has discretion to allow LEAs to establish their own procedures for calculating per-pupil expenditures, it states that, “If an SEA wants to ensure that data are uniform, understandable, and comparable across each LEA and school in a State, the SEA may establish uniform statewide procedures for calculation of per-pupil expenditures. The establishment of a uniform calculation of per-pupil expenditures by an SEA facilitates the comparison of the distribution of school funding within and across school districts.” See OPPORTUNITIES AND RESPONSIBILITIES FOR STATE AND LOCAL REPORT CARDS UNDER THE ELEMENTARY AND SECONDARY EDUCATION ACT OF 1965, AS AMENDED BY THE EVERY STUDENT SUCCEEDS ACT; pg. 38.

Although 30 states have indicated they plan to voluntarily participate in the FY 21 SLFS data collection as of Spring, 2021, NCES is engaged in a continuous recruiting effort with State Fiscal Coordinators to expand participation in the survey. Within the past three months, two more states indicated that they plan to participate in future SLFS data collections, bringing the total to 32 states that have expressed intention to participate in the SLFS.

During NCES’s annual State Fiscal Coordinators Workshop held on July 14, 2021 NCES and U.S. Census Bureau staff carefully explained how the SLFS expenditure data items are identical to data items collected at

the LEA level on the F-33 survey; explained how data reported on the SLFS are cross-checked during the Census Bureau’s review and edit process with data from the LEA-level F-33 survey and the state-level National Public Education Financial Survey (NPEFS); provided an overview of the larger independent review process wherein NCES and Census Bureau staff work to resolve data issues and anomalies; and discussed how the SLFS is ultimately utilized in statistical analysis reports disseminated to the public. NCES and Census Bureau staff also provided some reasons for States to participate in the SLFS—including the provision of direct technical help to improve school-level finance reporting, facilitating compliance with ESSA school-level current expenditures per pupil reporting requirements, and promoting consistency with the NPEFS and F-33 data that serve as inputs for Title I and other federal elementary-secondary education funding. NCES and the Census Bureau can provide individualized technical help for all SLFS participants given their decades of experience working closely with these same respondents on the NPEFS and F-33 data collections. NCES and Census Bureau staff are already familiar with the internal chart of accounts and accounting manuals that the vast majority of states use to prepare their NPEFS and F-33 submissions, and that many states have already incorporated into their school-level finance reporting. Federal staff are able to review and provide guidance to SLFS state education agency respondents on their internal crosswalks of school-level finance data to SLFS current expenditure categories. We anticipate that this will enhance accuracy of the SLFS data, as well as promote consistency between the SLFS and the finance data the same respondents report on at the state level for the NPEFS survey and district level for the F-33 survey.

NCES is committed to collaborating with the Department of Education Office of Civil Rights (OCR) in the administration of the SLFS. The SLFS expenditure data items are directly analogous to the former school-level finance data on the Civil Rights Data Collection (CRDC) that were collected every two years from FY 10 to FY 18. NCES collaborated with OCR to ensure that the data item definitions for the former school finance items on the CRDC were directly analogous to the expenditure data items on the F-33 survey for the corresponding fiscal years. SLFS is a viable alternative to the CRDC collection of school-level finance data by virtue of the fact that the former CRDC expenditure data items were based on expenditure data items from the F-33 survey.

Thank you again for your comment and please do not hesitate to contact us with questions or for help.

Sincerely,

Stephen Q. Cornman
Project Director
National Public Education Financial Survey (NPEFS)
School District Finance Survey (F-33)
School-Level Finance Survey (SLFS)
National Center for Education Statistics (NCES)
U.S. Department of Education

Submitter Information

Submitter's Representative: Ary Amerikaner, Vice President P-12 Policy, Practice, and Research

Comment

Thank you for the opportunity to submit public comments on the Department of Education’s Agency Information Collection Activities regarding the 2021-2023 School-Level Finance Surveys (SLFS). This data collection responds to a growing demand among policymakers, researchers, and the public for accurate and accessible school-level spending data to answer critical questions about whether districts are allocating resources equitably and effectively across schools. As this survey grows, it will become an increasingly important tool for understanding school-by-school spending and resource equity. As the Department of Education continues to improve upon this data collection, we submit the following recommendations.

We are pleased to see that changes are being made to ensure that the data collected align more closely with the data that states and districts are reporting on their school report cards. Improving consistency between those data collections not only reduces reporting burden for state education agencies – it improves the usability of the data by researchers, advocates and other stakeholders. At the same time, the removal of the school-level per-student expenditure data from the Civil Rights Data Collection has left the Department with no mechanism to collect school-level spending data. School-level spending data is critically important to build upon the understanding of funding inequities that the field has developed from decades of analyzing the district-level F33 data.

- We urge the Department of Education to make the SLFS a required data collection by using the Office for Civil Rights’ mandatory data collection authority.
- Until the SLFS becomes a mandatory data collection, we urge the Department to offer additional technical assistance to states to achieve a 100% response rate.

The proposed FY21 data collection plan includes an important metadata survey that asks questions about the SEA’s ability to report or prorate certain school-level expenditure data items. Results from this survey will improve our understanding of states’ ability to report expenditures disaggregated by source of funds.

- We urge the National Center for Education Statistics (NCES) to work with the Office of Elementary and Secondary Education (OESE) to use the metadata about disaggregation by source of funds to inform technical assistance to states to improve their ability to report school-level expenditures disaggregated by source of funds in this survey and on school report cards.

To help states respond to the COVID-19 pandemic, the federal government provided an unprecedented amount of federal relief funding to states. Expenditure data that states report to the SLFS for FY20 – FY24 will help us understand whether the federal dollars reached the schools and students that Congress intended and the pace at which those dollars were spent. However, FY18 SLFS are scheduled to be released more than one year after the proposed July 2020 timeframe, there is no clear indication of when data from FY19 or FY20 will be released, and the SLFS 2021 timeline indicates that the FY21 SLFS data file will be released in July 2023.

- We urge NCES to improve timeliness of reporting survey data by prioritizing publishing data files and technical documentation (including metadata about whether states are able to report expenditures disaggregated by source of funds), so that FY21 data files are published with the planned statistical analysis report no later than June 2023.
- We urge NCES to publish the FY2018 as soon as possible, but no later than November 2021, and to publish the FY2019 and FY2020 data no later than June 2022.

Thank you for the opportunity to comment on this critical data collection initiative.

Warm regards,

Ary Amerikaner
Vice President, P-12 Policy, Practice, and Research
The Education Trust

RESPONSE:

Dear Ms. Amerikaner,

Thank you for your feedback posted on June 28, 2021, responding to a request for comments on the School-Level Finance Survey (SLFS) 2021-2023 published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in the SLFS. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made. We are grateful for this process and your comment.

The SLFS is a viable alternative to the school-level per-student expenditure data that was formerly collected by the Civil Rights Data Collection (CRDC). The SLFS provides sufficient data to calculate total current expenditures at the school level. Total current expenditures from SLFS and membership from the Common Core of Data (CCD) School Universe can be utilized to calculate current expenditures per pupil at the school level.

The SLFS instructions and data items definitions provide a clear road map for reporting current expenditures per pupil on Every Student Succeeds Act (ESSA) report cards. The calculation of current expenditures per pupil based on SLFS data and on ESSA report cards are entirely consistent. The U.S. Department of Education guidance on the ESSA report cards states that, “To reduce burden, an SEA and its LEAs have the flexibility to align their procedures with existing NCES data collection procedures and to work closely with LEAs when developing guidance on how to calculate per-pupil expenditures. Under NCES data collection and publication procedures, the numerator for per-pupil expenditures consists of current expenditures (see ESEA section 8101(12)), which are comprised of expenditures for the day-to-day operation of schools and LEAs for public elementary and secondary education, including expenditures for staff salaries and benefits, supplies, and purchased services.” See OPPORTUNITIES AND RESPONSIBILITIES FOR STATE AND LOCAL REPORT CARDS UNDER THE ELEMENTARY AND SECONDARY EDUCATION ACT OF 1965, AS AMENDED BY THE EVERY STUDENT SUCCEEDS ACT; pg. 39.

<https://www2.ed.gov/policy/elsec/leg/essa/report-card-guidance-final.pdf>

NCES will continue to collaborate with States to ascertain the content of SLFS data that States can accurately report. To support this effort, NCES will also provide technical support to State Fiscal Coordinators through quarterly interactive webinars to help support consistent collection and submission of accurate SLFS data for FY 2021-2023. NCES and the Census Bureau provide quarterly technical workshops for state fiscal coordinators in part to ensure that there is a match between the SLFS data items that are requested and data that the state education agencies (SEAs) can actually produce. The SLFS variable definitions are thoroughly discussed and well communicated during these technical seminars. As a result of this collaboration, SEA fiscal coordinators have a better understanding how to report accurate and timely

fiscal data on the SLFS for their state or jurisdiction. The technical workshops facilitate reporting accurate, consistent, and timely information because the finance data item definitions and survey instructions are discussed in exhaustive detail.

NCES will closely examine the SEA responses to the SLFS data plan pertaining to questions about the SEA's ability to report or prorate certain school-level expenditure data items. NCES continues to research whether SEAs have the capacity to report school-level expenditures based on the specific source of funds. NCES will work with the Office of Elementary and Secondary Education (OESE) to use SEA responses on the data plan to inform future technical assistance to states and improve their ability to report school-level expenditures disaggregated by source of funds.

Submissions by SEAs to the Census Bureau will be analyzed for accuracy. The SLFS data is subjected to a comprehensive review process, including multiple independent reviews by an outside entity. Subsequent to independent reviews of the SLFS data, requests for clarification, reconciliation, or other inquiries may be made by NCES or the Census Bureau. SEAs may also, on their own initiative, resubmit data to resolve issues not addressed in their final submission of SLFS data. All outstanding FY 21 SLFS data issues must be reconciled or resolved by the SEAs, NCES, and the Census Bureau as soon as possible, but no later than March 31, 2023. The documentation for the FY 21 SLFS data will be drafted by March of 2023. The final FY 21 SLFS data file will be prepared and subjected to NCES technical review by June of 2023. The aforementioned steps to enhance data quality account for the original NCES projection that the FY21 SLFS data file will be released by July 2023. NCES will make every effort to release the statistical analysis report and the FY 21 SLFS data in advance of the projected date, as early as June, 2023.

Thank you again for your comment and please do not hesitate to contact us with questions or for help.

Sincerely,

Stephen Q. Cornman
Project Director
National Public Education Financial Survey (NPEFS)
School District Finance Survey (F-33)
School-Level Finance Survey (SLFS)
National Center for Education Statistics (NCES)
U.S. Department of Education

Submitter Information

Submitter's Representative: Lisa Hammersley, Executive Director

Organization: School and State Finance Project

Comment

Thank you for the opportunity to provide comments on the Department of Education's Common Core of Data (CCD) School-Level Finance Survey (SLFS) 2021-23. As a nonpartisan, nonprofit policy organization focused on education funding and state finance issues, the School and State Finance Project understands the importance of collecting, publishing, and analyzing school-level data on educational expenditure and resource distribution within school districts, between school districts, and across neighborhoods. With a commitment to providing independent analysis, building public knowledge, and improving transparency, we rely on data sources such as the School-Level Finance Survey to fulfill our mission of developing thoughtful data-driven solutions that address Connecticut's education funding challenges.

The School and State Finance Project respectfully provides the following two comments on this Agency Information Collection Activity to ensure this important data collection continues to serve the significant demand for finance data from researchers, policymakers, and the public.

1. The Department of Education should consider using the School-Level Finance Survey as a vehicle for understanding the use of federal stimulus funds to combat the COVID-19 pandemic.

Over the course of the COVID-19 pandemic, Congress has provided almost \$279 billion for education through the Education Stabilization Fund by passing three stimulus bills, with the bulk of these resources contained in the Elementary and Secondary Education Relief (ESSER) Fund. These resources have the potential to transform public education and it is crucial for researchers, policymakers, and the public to understand the distribution and spending of these resources on an intradistrict and interdistrict basis. Therefore, we recommend the Department consider how the SLFS could be used to track the distribution of ESSER funds over the applicable fiscal years through the addition of relevant data items.

2. The Department of Education should consider transforming the School-Level Finance Survey into a mandatory data collection.

School-level data is critical to understanding disparities in student need and the resources used to educate students in schools across the country. There are significant gaps, however, in the availability of nationwide standardized education finance data at the school level given the voluntary nature of the SLFS. Per Supporting Statement Part B and C provided by the National Center for Education Statistics (NCES), 30 State Education Agencies (SEAs) have committed to voluntarily participate in SLFS and submit data for the FY21 collection. As the finance data items previously collected by the Office for Civil Right Civil Rights Data Collection (CRDC) have been discontinued as of the FY20 collection (per Supporting Statement Part A from NCES), the Department should consider transforming the SLFS into a mandatory collection, in place of the CRDC finance data collection, to ensure researchers, policymakers, and the public have access to a more complete nationwide collection of school-level finance data. Doing so has the potential to transform our understanding of the resources used to educate students across the country, and how state education policy can be harnessed to reduce these disparities and ensure schools and districts across the country have access to the resources needed to educate students regardless of district and neighborhood socioeconomic status, income, or wealth.

Thank you for the opportunity to submit our comments regarding the School-Level Finance Survey collection for FYs 2021, 2022, and 2023.

Sincerely,

Lisa Hammersley
Executive Director
School and State Finance Project
470 James Street
Suite 7
New Haven, CT 06513

RESPONSE:

Dear Ms. Hammersley,

Thank you for your feedback posted on June 28, 2021, responding to a request for comments on the School-Level Finance Survey (SLFS) 2021-2023 published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in the SLFS. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made. We are grateful for this process and your comment.

The National Public Education Financial Survey (NPEFS) and School District Finance Survey (F-33) collect finance data on elementary and secondary education in the United States. The Coronavirus Aid, Relief, and Economic Security (CARES) Act, the Coronavirus Response and Relief Supplemental Appropriations Act (CRRSA), and the American Rescue Plan Act (ARP) provided approximately 282.6 billion for public elementary, secondary, and higher education. The CARES Act also appropriated \$150 billion to the Coronavirus Relief Fund.

In early 2021, NCES and the Census Bureau received approval from the Office of Management and Budget (OMB) to add COVID-19 revenue and expenditure data items to the FY 20 NPEFS and F-33 surveys. NCES is currently examining the question of whether there is a match between the new CARES Act variables and data that State Fiscal Coordinators can report in terms of burden, data quality, and resources being expended by states and the federal government. If SEAs can produce data that matches the COVID-19 revenue and expenditure data items requested on the NPEFS and F-33 surveys, NCES will consider requesting OMB approval to add identical COVID-19 expenditure data items to the School-Level Finance Survey (SLFS) for future data collections.

Thank you again for your comment and please do not hesitate to contact us with questions or for help.

Sincerely,

Stephen Q. Cornman

Project Director
National Public Education Financial Survey (NPEFS)
School District Finance Survey (F-33)
School-Level Finance Survey (SLFS)
National Center for Education Statistics (NCES)
U.S. Department of Education