

**GEER Annual Data Collection 60-day Comment Responses**

Summarizing Comment	Applicable questions	Applicable comments	Response
<p><b>Burden</b>                      These reporting requirements present an undue hardship for school districts and that the Department of Education seems out of touch with the reality of what it would take to comply.</p> <p>If there is a need to add additional reporting, please focus on the LEAs that didn't reopen.</p> <p>Our state does not collect several of the proposed data elements in the format that USDE is requesting. This will result in a significant burden for our state to create a data reporting system to collect this information and for LEAs to report.</p> <p>These proposed changes will only serve to add massive burden to our school district and distract administration from serving students to completing excessive reports. What will this data be used for?</p>	<p>Whole form</p>	<p>Oroville Union HSD – 07;                      Napa Valley USD – 06;                      Anonymous – 04;                      Riverbank USD – 05;                      Anonymous -08;                      Commentator from CA – 09;                      Anonymous – 11;                      New York State Education Department – 13;                      Wisconsin Department of Public Instruction - 12</p>	<p>Form change.</p> <p>ED acknowledges that reporting this information results in burden on SEAs and LEAs, that systems may not yet be in place to collect and report the information, and that developing such systems takes time.</p> <p>It is important that parents, educators, and the public have accurate, transparent, and meaningful information about how all students are learning during and after the pandemic and what learning opportunities are available.</p> <p>After review and validation by the Department, this data will be made publicly available on the <a href="#">Education Stabilization Fund (ESF) public transparency portal</a>, used by the Department to inform technical assistance opportunities, and shared with Congress, the public, and the education community to support student learning and timely interventions.</p> <p>In response to commentator feedback, the GEER collection form will be updated to collect data on 'Planned Uses of Funds' instead of 'Obligations' to lessen the burden on submitters and ensure accurate reporting.</p>
<p><b>Burden Estimate</b>                      The public reporting burden for this collection of information was estimated by the USDE to average 4.1 hours per response. We find that this estimate is not realistic and that, given the number of questions and level of detail requested, completing this data reporting requirement will consume significantly more time.</p>	<p>Whole form</p>	<p>Anonymous – 11;                      New York State Education Department - 13</p>	<p>ED concurs.</p> <p>In response to commentator feedback, ED will update the burden estimate to 24 hours per response from SEAs and Outlying Areas and 12 hours per response from LEAs.</p>
<p><b>Timeline</b>                      Our state cannot publish a tool to the field</p>	<p>Whole form</p>	<p>New York State Education Department –</p>	<p>The timeline of the collection is dependent on OMB approval, and ED anticipates it will begin after February 2022.</p>

<p>to collect the proposed data until final rules are developed and promulgated. We would strongly encourage USDE to provide states with the final data collection form no less than 4 months from the due date.</p> <p>If SEAs are not able to obtain the final data form requirements quickly, we would request that USDE extend the due date.</p> <p>Timelines on reporting are already very short.</p>		<p>13; Commentator from CA - 09</p>	<p>ED believes it is important for grantees to report information in a timely manner regarding the implementation of GEER to inform the Department's monitoring and technical assistance and to provide transparency to the public about the uses of the GEER funds.</p>
<p><b>Obligations</b> NYSED does not collect real time obligation data on a specific category basis in the way the USDE is requesting. This will result in a significant burden for NYSED to create a data reporting system to collect this information and for LEAs to report.</p> <p>We strongly recommend that the USDE remove the requirement to report obligated funds from the data collection. We understand the desire and intent to collect information on obligated amounts, but we do not currently collect the amount of funds obligated from LEAs. It is not feasible to do so, nor does it provide a complete picture of how LEAs are planning to spend their funds</p> <p>An alternative to this requirement could be to require LEAs and SEAs to report on how funds were budgeted, but this too would be additional work. However, budgeted funds would demonstrate how an LEA is planning to use the funds.</p>	<p>Whole form</p>	<p>New York State Education Department - 13; Wisconsin Department of Public Instruction - 12</p>	<p>Form change.</p> <p>Based on commentator feedback and ED's understanding of the limited systems at the state and district levels for collecting and reporting obligations data, the GEER collection form has been updated to collect data on 'Planned Use of Funds' instead of 'Obligations' to ensure accurate reporting.</p>
<p><b>Unknown Reporting Requirements</b> Specifically, LEAs will be asked to generate</p>	<p>Whole form</p>	<p>New York State Education Department -</p>	<p>No change.</p>

<p>data for CARES funding without having been notified that such data elements were required so that systems of collection could be established contemporaneously with the distribution and use of funds. This has the potential to lead to inaccurate data reporting.</p>		13	<p>The data requested in this year's collection is generally consistent with the data requested in last year's collection with the exception of the request for obligations data which is being removed in favor of requesting data on 'Planned Use of Funds'.</p>
<p><b>Federal Fiscal vs. State Fiscal/Academic Year</b>  This collection assumes that data at the LEA level includes specific dates that can be extrapolated in accordance with the USDE timelines, which are based on the federal fiscal year. The proposed reporting periods are not aligned with SEA or LEA fiscal years or calendar years and will require building new reports of existing data which will be an additional burden on LEAs.</p>	Whole form	Wisconsin Department of Public Instruction - 12	<p>No change.</p> <p>ED acknowledges that the reporting period for this collection does not align with the fiscal year or academic year of all SEAs and LEAs. Fiscal and academic years vary between localities across the country, so it is not possible for ED to ensure alignment with the reporting periods.</p>
<p><b>Duplicative Reporting</b>  The quarterly reporting already provides a level of oversight and understanding of what is done with the funds. Also, the expenditures are already subject to the annual financial audits of each district.</p> <p>We have spent the funds on the allowable purposes, which we report on a quarterly basis and is reviewed by our independent auditors on an annually.</p>	Whole form	Oroville Union HSD - 07; Anonymous - 08; Commentator from CA - 09; Anonymous - 11	<p>No change.</p> <p>ED acknowledges that SEAs and LEAs are asked to provide data through a variety of other collections and believes this collection is unique in regard to the questions asked and the collection reporting period.</p> <p>ED believes this collection is necessary to effectively monitor the use of funds and ensure that Congress, parents, educators, and the public have accurate, transparent, and meaningful information about how students are learning during and after the pandemic and what learning opportunities are available.</p>
<p><b>Inability to Hire Required Staff</b>  Support staff in most districts were already stretched thin. Recruitment has been unsuccessful in many areas to find extra help, or even fill vacancies.</p> <p>We are also short staffed. Due to the extended increases of the unemployment benefits, many people have chosen not to</p>	Whole form	Oroville Union HSD - 07; Anonymous - 08;	<p>ED acknowledges difficulties in hiring personnel currently experienced across the country.</p> <p>The GEER collection form has been updated to collect data on 'Planned Use of Funds' instead of 'Obligations' to lessen the burden on submitters and ensure accurate reporting.</p>

<p>work and agencies and school districts across the nation are having a difficult time staffing their positions.</p>			
<p><b>Equitable Services to Non-public schools</b>  Under CRRSA (GEER II), LEAs receiving funds were not obligated to provide equitable services to participating nonpublic schools. As currently constructed, this data collection item is likely to cause confusion. NYSED would strongly recommend that the organization of this item be adjusted so that responding LEAs and SEAs are confused about programmatic obligations.</p>	<p>Section 1  Question  10</p>	<p>New York State  Education Department -  13</p>	<p>Form change.   The form has been updated to provide clarification that non-public schools may not have received services paid for with GEER funds and LEAs should report accordingly.</p>