
MEMORANDUM

TO: Office of Information and Regulatory Affairs
Office of Management and Budget

FROM: Stephanie Stulich
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Kathy Axt, Office of the Chief Data Officer (OCDO)
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SUBJECT: Change request for 1850-0951: Study of District and School Uses of Federal Education Funds clearance request

DATE: August 30, 2021

This memo is to request a change to the collection of state suballocation data through the Study of District and School Uses of Federal Education Funds (UFEF). This change is needed to respond to information needs about additional funds recently appropriated under the American Rescue Plan Act that was passed on March 2021. The specific change requested is to:

- Add collection of state suballocations data for the additional \$123 billion for the Elementary and Secondary School Emergency Relief (ESSER) fund.

Background

The UFEF study is collecting state suballocation data as part of a cross-cutting study to examine the distribution and uses of federal education funds under five of the largest federal elementary and secondary education programs administered by the U.S. Department of Education, as well as funds provided to school districts through the CARES Act through three relief funds: ESSER, the Governor's Emergency Relief (GEER) fund, and Coronavirus Relief Fund (CRF). On February 4, 2021, OMB approved our clearance request for this study, including collection of state suballocation data as well as district-level on the uses of those funds (1850-0951).

The coronavirus pandemic is causing substantial disruptions in school district operations and the amount of state and local revenues to support K-12 schools. To support elementary and secondary schools

during this extraordinarily challenging time, Congress has appropriated three rounds of funding for the three CARES Act relief funds – \$16 billion in March 2020, \$58 billion in December 2020, and \$123 billion in March 2021. The prior OMB approvals covered the collection of state suballocations for the first two rounds of ESSER, GEER, and CRF funding (March 2020 and December 2020). Because the March 2021 funding for ESSER is substantially larger than the previous rounds of funding, we believe it is important to include those funds in the study’s analysis of how well these funds are targeted and how the CARES Act funding is boosting revenues for local school districts.

As you may be aware, the Office of the Chief Data Officer is collecting similar data by harvesting subgrant amounts from the government-wide financial tracking system authorized under the Federal Funding Accountability and Transparency Act (FFATA). We have conducted validation checks between the data we collected and the OCDO data for the first round of CARES funding, and these checks raised concerns about the completeness and accuracy of the OCDO data. We understand that OCDO is working to improve their data quality, but because of the size and importance of the third round of CARES funding, we think it would be prudent to continue the NCEE study’s collection of these data. This will also provide the opportunity for further validation checks between the two datasets, to increase confidence in the quality of the FFATA data going forward.

Our Request

We are requesting OMB approval to expand the collection of state suballocation data to request these data for the additional \$123 billion in ESSER funds appropriated in March 2021. We believe that this change does not warrant the submission of a new data clearance package because the additional reporting burden will be very small. The additional data will be collected at the same time as the suballocation data for the December 2020 funding, so the additional reporting burden is estimated as just 26. The additional burden is estimated as just 30 minutes per state, amounting to a total increase of 26 burden hours for the state- and district-level data collection (from 7,191 to 7,217 hours) or an estimated \$1,170 in additional cost burden (from \$323,595 to \$324,765). Furthermore, submission of a new data clearance package would delay ED’s ability to provide information on the targeting of these additional ESSER funds, which may be important for informing future deliberations about federal assistance to help districts and schools make adjustments to handle the disruption caused by the pandemic.