



September 22, 2020

Thomas Smith
U.S. Census Bureau
4600 Silver Hill Road
Room 7K250A
Washington, DC 20233

Re: *Federal Register* notice of August 25, 2020, for the Annual Survey of School System Finances; Form F-33 (OMB Number: 0607-0700)

Dear Mr. Smith:

The Bureau of Economic Analysis (BEA) strongly supports the continued collection of data by the U.S. Census Bureau's Annual Survey of School System Finances. These data are critical to the quality of several key components of BEA's economic statistics.

Form F-33 is critical to BEA's estimates of state and local government receipts and expenditures for the national income and product accounts (NIPA) and the input-output accounts (I-O). The attached table describes how data from the forms are used by BEA.

Please keep BEA informed about any modifications to the forms. We are particularly interested in any modifications proposed during the forms' approval process that would substantially affect our use of these data. For additional information, please contact Tiffany Burrell, Source Data Coordinator, on 301-278-9618, or by e-mail at Tiffany.Burrell@bea.gov. Should you need assistance in justifying these forms to the Office of Management and Budget, please do not hesitate to contact BEA.

Sincerely,

DENNIS FIXLER

Digitally signed by DENNIS

FIXLER

Date: 2020.09.23 14:52:56 -04'00'

Dennis Fixler
Chief Economist

Attachment

ATTACHMENT

Annual Survey of School System Finances, Form F-33

Items Used	Estimates Prepared for
Revenues (Part I, Sections A - D); Current Operation Expenditure (Part II, Sections A-D); Capital Outlay Expenditures (Part III) ARRA Funds Reporting (Part X)	State & local receipts and expenditures; Personal consumption expenditures; Gross domestic investment in GDP
Property taxes (Part I, Section A, Question 1); General sales or gross receipts tax (I,A,2); Public utility taxes (I,A,3)	Taxes on production and imports in government receipts in GDP
Tuition fees from pupils and parents (I,A,9); Transportation fees from pupils and parents (I,A,10); Textbook sales and rentals (I,A,11); School lunch revenues (I,A,12); District activity receipts (I,A,13)	Personal consumption expenditures in GDP; government services output estimates in I-O
Revenue from other sales and services (I,A,14); Capital outlay expenditures on construction (III,1), on Instructional equipment (III,3), on All other equipment (III,4)	Services output and government purchases in the I-O; gross domestic investment in GDP



October 26, 2020

Thomas J. Smith
Office of the Chief Information Officer
U.S. Department of Commerce
Washington, DC 20230

RE: USBC–2020–0019

Submitted via email: Thomas.J.Smith@census.gov

Dear Mr. Smith,

The National Center for Special Education in Charter Schools (the Center) is dedicated to ensuring that students with disabilities have equal access to charter schools and that charter schools are designed and operated to enable all students to succeed. The Center is a leader and partner with state charter authorizers, charter networks, and charter schools across the United States. To date, 45 states and the District of Columbia have enacted charter school laws and currently approximately 300,000 students with disabilities attend public charter schools. The ongoing growth in charter schools requires that the U.S. Department of Education (ED), the education and special education fields as well as students and their families understand key data points essential to both the opportunities for access in post-secondary education as well as the status of students with disabilities. To that end, we offer the following recommendations and comments regarding collection of public K-12 school system finance data through the *Annual Survey of School System Finances (Survey)*.

Survey Query (a): Whether the proposed information collection is necessary for the proper functions of the Department, including whether the information will have practical utility.

Recommendation: Proceed with the Survey and expand it to ensure data is available on public charter school vs. traditional public-school expenditures on special education as well as the allocation of categorical and competitive funding across different school models.

Rationale: The Center believes that there is great utility in conducting the Survey and that doing so will help ensure that the public, researchers and advocates have access to data regarding both federal funds received and expenditures made to educate students with disabilities. We know that local, state, and federal policy can all be informed by the availability of data that disaggregates spending to show how resources are being allocated, including by subgroups of students (e.g. students with disabilities) and educational settings. This includes being able to differentiate the data by school model, such as by public charter school and traditional public school, which can be done through alignment of the collection methodology and school identification markers with the definitions of school models employed in the standard EDFacts data collection. Such a process allows for later analysis by looking at school models, which is valuable to the education field and to the public.

Survey Query (b): Add[ing] new data items for special education expenditures in response to increasing demand by policymakers, researchers, and the general public.

Recommendation: Expand the Survey and add new data items to the Survey. The notice does not indicate what data elements might be collected. The Center recommends adding the following data elements:

1. Include fund allocation and expenditure data per Local Education Agency (LEA), school, and student [group per the Elementary and Secondary Education Act (ESEA)]. The collection of the data at both the LEA and school level is particularly important for charter schools because non-LEA charter schools can easily be subsumed in traditional school district data. Having expenditure by student subgroup would also be particularly useful and powerful.
2. Align and sync the data collection with ED Facts across the charter school ED Facts data files. In addition to allowing analysis by school model (charter school vs. traditional public school, as discussed previously), this would allow further analysis of special education expenditures by factors such as charter school authorizer, charter school management organization, and by management organization type (e.g., nonprofit v. for profit).
3. For CARES Act expenditures, add an analysis of federal funds distributed to charter schools, including non-LEA charter schools, and the categories of use.
4. In the federal revenue section, as feasible, provide the information on the competitive federal grant funds (e.g., Charter School Program) received by public charter schools (both LEA and non-LEA) and their use to support students with disabilities. Such data collection should not be duplicative of data collection on non-grant activities and should not duplicate data collection undertaken by federal grant offices so long as that data collection and analysis will be made available to the public in a timely manner.

Rationale: See Rationale above. More specificity in the funding data regarding charter schools and students with disabilities would be extremely beneficial.

Survey Query (c): Evaluate ways to enhance the quality, utility, and clarity of the information to be collected.

Recommendation: Ensure the final data collection provides information on the National Center for Education Statistics (NCES)/Census Bureau's methodology and that such methodology enables researchers to utilize the data set produced alongside other federal data sets, such as but not limited to the Civil Rights Data Collection (CRDC), ED Facts data sets, and those collected and prepared by individual formula and competitive federal grant offices.

Rationale: Federal, state, and local policy could be strengthened when consistent data is available about federal revenue streams used by states/districts/schools and the federal grants (e.g., formula, competitive, or otherwise) that each are tied to. From this notice it is unclear if this is a focus of the collection, but the Center believes such methodological alignment is necessary to achieve the objective of "enhancing the quality, utility, and clarity of the information to be collected." The Center is unsure if this is a matter of something as simple as aligning naming protocol or if it is complex enough to impact the ability to analyze longitudinal data across the impacted programs, but we strongly recommend making data alignment with the goal of facilitating multi-data-set analysis a high priority.

Thank you for the opportunity to comment on this important initiative. Again, the Center strongly recommends proceeding with expanded data collection on federal education expenditures, including on special education expenditures, in a way that facilitates robust analysis.

Sincerely,

A handwritten signature in blue ink that reads "Lauren Morando Rhim". The signature is written in a cursive, flowing style.

Lauren Morando Rhim, Ph.D.
Executive Director and Co-Founder