Author Full Name :   Courtney Preziosi   **Received Date :** 11/29/2021 04:05 PM

Comments Received :

Comments from the Alaska Department of Education & Early Development (DEED)

General Statement – Several of the sections include reporting categories beyond what is stated in the CARES, CRRSA, and ARP laws. Alaska LEAs and the SEA have not been tracking in alignment with portions of the data collection as it is currently proposed. Ensuring the data collected is accurate would be extremely challenging without systems in place to track from the inception.

Section 3.b.1 - The list of activities goes beyond the allowable activities listed in the CARES, CRRSA, and ARP laws. Alaska LEAs have not been tracking spending this way. Retroactively assigned spending to these additional categories would require an additional data collection.

Section 3.b.2 through Section 3.B.8 – These sections would require an additional data collection. These additional data collections would be an additional burden on districts.

Section 3.b.10 – Would require an additional data collection.

3.c - Would require an additional data collection as CARES, CRRSA, and ARP laws were not designed as school-based programs so this was not tracked from the inception. Clarify definition of "Average amount expended per pupil at or on behalf".

Section 4.a.1 – This would require an additional data collection and would be extremely challenging to ensure accurate data without systems in place to track from the inception.

Section 4.b.2 - LEAs are not currently tracking activities by subpopulation. This would require an additional data collection and would be extremely challenging to ensure accurate data without systems in place to track from the inception.

Section 4.c.1 – Would require an additional data collection.

Burden Statement – 140 hours per SEA and LEA is an underestimate. With current LEA staff shortages, the issue wouldn't just be the number of hours required to complete this data collection, it would be having the staff necessary to dedicate time to the related work.