



November 29<sup>th</sup>, 2021

Secretary Cardona,

Thank you for providing the State Education Agencies (SEAs) the opportunity to make public comment on the new proposed rules for the collection of data regarding ESSER I, ESSER II, and ARP ESSER. Rural schools have been struggling to support the requests of the Federal Department of Education data collection and remaining compliant with federal rulings.

The state of Montana puts our students and children first. The quality of the education of our children and the needs of our teachers, administrators, and parents remains our utmost concern. We would like to express our gratitude that some burdens for data collection have been eased for financial reporting. It is appreciated that:

- Obligated funds are no longer required for federal submission rather only expended funds must be submitted for federal review.
- Data need not be segregated by the 20% set aside to address lost learning time.

Simultaneously, Montana would like to express our frustration at the substantially burdensome reporting requirements that remain in place.

It has been estimated that school clerks and administrators may be expected to dedicate upwards of 140 hours to fulfill federal data requests. This represents a significant burden to our frontier school districts that may have only a single administrator representing a superintendent, principal, and sometimes a bus driver and teacher as well. An additional 140 hours of requested work time is quite burdensome for the entirety of the school system.

**We ask that the Federal Department of Education reconsider the reporting requirements to further reduce the time-allocation of school administrations.** The requirements for data-reporting, while improved, are still difficult for frontier schools like ours. We Montanans are dedicated to delivering quality instruction to our students. High standards are better achieved when teachers and administrators have time for learning and are not also encumbered by over-enthusiastic federal requisitions of data.

Thank you for the consideration.

Sincerely,

A handwritten signature in cursive script that reads "Elsie Arntzen".

Superintendent Elsie Arntzen.

