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The State of Delaware would like to reiterate that we are concerned with the proposal from NCES to require school level finance survey data that currently is reported at the district level. While this method of collecting data has good intentions, it will be a huge undertaking for the State of Delaware. This will require additional personnel, time, and resources which will cause hardship for our local education agencies (LEAs). To ensure compliance with the proposed change, the state will have to make programming changes to the reports which is an expensive and time-consuming process. We also have concerns regarding the implementation of the new reporting structure which is scheduled to begin for the reporting period of 2021-22 school year. The LEA school level data in the new proposed categories is not available at the school level for previous years so we would not be able to provide the data as proposed for the previous or even current school year. Due to the barriers identified, I request NCES consider working with the states to add data elements to ESSA reports instead of mandating the proposed school level data sets at this time.