

TO: Carrie Clarady, NCES
FROM: Noelle Ellerson Ng, Associate Executive Director
RE: ED-2022-SCC-0120, 2023-03716
DATE: March 27, 2023

The following comments are submitted jointly by AASA, The School Superintendents Association (AASA) and the Association of School Business Officials International (ASBO).

On behalf of AASA, The School Superintendents Association, and the Association of School Business Officials International, I am writing in response to a second IES request for comments on the NCES proposal to mandate the School-Level Finance Survey (SLFS) for all schools in all districts in all states starting 2022. Our original comments, posted November 29, 2022, can be found at ED-2022-SCC-0121-0052.

I write to reiterate our opposition to this proposed data collection and urge IES to focus on improving an already-existing school-by-school financial data collection under the Every Student Succeeds Act (ESSA). The revised NCES proposal fails to address our many fundamental concerns.

Broadly, we remain deeply concerned that this proposed data collection is extremely burdensome, will fall far short of its stated goals in terms of actionable, functional, and accurate data (especially in the short term) and come with significant fiscal and opportunity cost.

Rather than enumerate those concerns one by one yet again here, we respectfully ask the U.S. Department of Education to engage directly with the major groups impacted by its proposal, like ours. To date, the department has refused to do so. We do not understand why.

The formal comment process IES now has engaged twice on behalf of NCES only works if the proposed action is just that: A proposal. We fear that this proposal, in contrast, is a foregone conclusion in search of external justification.

It makes no sense to collect and respond to comments from the field when NCES seems intent on ignoring that input. We continue to raise legitimate concerns from the nation's superintendents—yet those concerns seem to be falling on deaf ears.

If it advances, this revised proposal will consume the time and energy of district finance teams for years to come. It should come as no surprise to our federal education leaders that the timing simply could not be worse. The nation's school districts are grappling with unprecedented financial turmoil and devastating learning gaps from the pandemic (especially for the most vulnerable students).

We see nothing in this proposal that would justify diverting scarce time and resources away from the mission-critical, student-centered work that needs doing in our nation's districts.

Again, we advise IES to halt its proposal to make SLFS mandatory. And we ask NCES to engage directly with groups like ours toward a responsible solution.

Please direct any questions to Noelle Ellerson Ng (nellerson@aasa.org).

Sincerely,



Noelle Ellerson Ng