Clarady, Carrie

From: Sara R. Shaw <sradshaw@gmail.com>
Sent: Monday, March 27, 2023 3:40 PM
To: IC DocketMgr
Cc: Clarady, Carrie
Subject: Official comment on proposed SLFS mandate

Thank you for the opportunity to provide comment on the proposed SLFS mandate. I offer the following comments as a previous SEA manager of financial transparency initiatives; my comments are made solely on behalf of myself and not any current or former employer.

As a general matter, I wholeheartedly support efforts to increase school spending transparency and have been excited for the potential of school-level financial data to drive critical conversations, research, and action toward better and fairer resource allocation for our students. The proposed SLFS mandate does not effectively support these goals. Instead, NCES could invest in the existing ESSA financial transparency mandate to fully leverage its potential.

In my SEA experience, I frequently heard LEA complaints against new mandates that required new, burdensome data collection and reporting. Some of the most infuriating mandates, according to these LEAs, were those that resembled and shared goals with existing practice but were different enough to render existing infrastructure insufficient.

Part of our SEA's success in implementing the ESSA mandate lay in the time we spent acknowledging those frustrations, committing to implementing this new mandate as simply as possible while still upholding the law and gaining the potential benefit of the new data. Critically, it was not solely the SEA that determined what that potential benefit was; rather, we engaged LEA representatives and other stakeholder groups to set our “value proposition.” These steps allowed us to implement the mandate in a way that honored our LEAs’ time and desire to serve students even as we led them through the sometimes painful process of accounting for their spending at the school level for the very first time. (Our SEA chart of accounts does not go down to the site level, and the vast majority of our LEAs had not tracked spending by site prior to ESSA.) We were left with a data set and stakeholder group full of potential for timely discussion, research, and action.

The proposed SLFS mandate would not honor this work. While implementation in some states may be easy, the states without a site-based chart of accounts face a daunting overhaul that will require hours of additional time and expense for little additional value. In theory, detailed school spending data at the level that the SLFS proposes would be great. However, the data would need to be timely, comparable, and of high quality in order to be most valid and useful. The current proposal does not offer sufficient evidence that it will fulfill all three of those key characteristics. Were I still at an SEA, I would have a difficult time justifying this new requirement to my team and to our hundreds of LEAs that already pushed hard to fulfill the ESSA requirement, potentially jeopardizing the good faith we built and the existing ESSA data.

Advancing school spending transparency is a worthy cause. I encourage NCES to pursue that cause through proven channels for successful implementation: in partnership with SEAs and LEAs, leveraging existing data, honing in on the potential value of the data to stakeholders, and designing any new data collection to best support those stakeholders and the value proposition. The ESSA mandate was a decisive step forward in school-level financial data collection. What would it look like for NCES to claim that mandate as a victory and further invest in it to refine its precision and use?

Sara Shaw