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Comments Received:

The BAS is intended to update boundaries for local governments, and most school districts in the U.S. are legal governments - according to the Census Bureau's Census of Governments and the Bureau's Annual Survey of State and Local Government Finances. Yet he Department of Education is required to pay for annual updates to school district government boundaries, even though the Census Bureau estimates annual revenues for these local governments at more than \$800B (local, state, and federal). Spending on K-12 public education accounts for a substantial portion of most state budgets, and local school systems often function as one of the primary employers and property owners in local communities. Yet, the Census Bureau excludes School Districts from the BAS because they are single-purpose governments rather than general purpose governments. What statutory authority restricts the BAS to general purpose governments only? Why are school districts excluded from the BAS when parts of the Census Bureau highlight their critical role as local government entities? Title 13 USC Section 6 references collections from 'other units of local governance and their instrumentalities' rather than general purpose governments. The Census has been aware of the need for school district boundary updates for 50 years (since the early 1970s), and it's past time for the Census Bureau to integrate school districts into the BAS - or at least pay for school district government boundary updates out of direct appropriations for Census Bureau program activities.