

September 16, 2009

The Honorable Arne Duncan
Secretary
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202



*Excellence and Equity
in Public Education
through School Board
Leadership*

Re: ***National School Boards Association Comments on Proposed Adjustments to Statutory Caps on State Administration; American Recovery and Reinvestment Act of 2009 (ARRA); Title I, Part A of the Elementary and Secondary Education Act (ESEA) of 1965, as Amended; Part B, Section 611 of the Individuals with Disabilities Education Act (IDEA)
Docket ID ED-2009-OESE-0011***

Office of Advocacy

- *C.H. "Sonny" Savoie
President*
- *Anne L. Bryant
Executive Director*
- *Michael A. Resnick
Associate
Executive Director*

Dear Secretary Duncan:

The National Schools Boards Association (NSBA), representing over 95,000 local school board members through our state school boards associations, is pleased to provide comments on the Proposed Adjustments to Statutory Caps on State Administration, published in the *Federal Register* on August 17, 2009.

We applaud your efforts in recognizing the significant increased costs associated with new data collection requirements at the state level related the *American Recovery and Reinvestment Act* (ARRA). We view such expenditures as legitimate and support the proposed adjustments of the caps as an efficient way to address these new requirements.

While the collection of such data is important to assess the impact of these additional ARRA funds, we are concerned that the increased data collection costs at the local educational agencies (LEA) are not equally recognized. As the Department is aware, the source of much of the data to be collected is at the school and LEA levels.

Accordingly, NSBA recommends that the Department make available some portion of the additional funding to support LEAs in the design and development of their expanded data collection systems as well. The mechanisms used by states to support LEAs could vary among the states since the circumstances and conditions could vary substantially.

Thank you for the opportunity to share our views, Questions concerning our comments may be directed to Reginald M. Felton, director of federal relations, at 703-838-6782, or by e-mail, rfelton@nsba.org.

Sincerely,

Michael A. Resnick
Associate Executive Director

MAR: rf/kc

G:Adv/Regulations/2009/09.15.09ARRATitleIandIDEACapsComments

National School Boards Association

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