

February 16, 2016

Kristen Walls-Rivas
US Department of Education
400 Maryland Ave, SW Room 3C103
Washington, DC 20202

In the Matter of Notice of Proposed Rulemaking: Impact Aid Program
Docket ID: ED-2015-OESE-0109

Dear Ms. Walls-Rivas:

The undersigned organizations, representing school administrators, teachers, parents and the education technology community write in response to the Notice of Proposed Rulemaking (NPRM) for Impact Aid. These comments focus on regulation 222.35 related to methods for school districts to count Federally Connected Children. Specifically, the US Department of Education is seeking public comment on the following questions:

- **Are there alternative methods for counting federal-connected children besides the parent-pupil survey form or source check collection tools, either in use or that you propose?**
- **Can you propose ways in which online or electronic data collection might be used to facilitate the data collection process? This may include but is not limited to the electronic collection of parent-pupil survey forms and the use of student information systems for Impact Aid data collection.**

In today's digital world, individuals and organizations continue to adopt mobile, online and other technologies to more efficiently and effectively communicate and manage information electronically. Federal examples include citizens' electronic submissions of FAFSA student aid applications and IRS tax filings. The current practice of distributing, collecting, collating and counting paper Impact Aid parent-pupil surveys – including the requirement that parents fill out a form for each child – is outmoded.

We believe that there are a variety of technologies school districts can successfully implement as an alternative to the parent-pupil survey. School districts can leverage such electronic mechanisms and formats for Impact Aid data collection and reporting, whereby the information can be authenticated and remain auditable. School districts are embracing technology-enabled processes and digital formats, such as Student Information Systems (SIS) and Learning Management Systems (LMS) to collect, track and analyze information. According to a 2010 US Department of Education report, "Nearly all school districts have an electronic student information system providing real-time access to information such as enrollment and attendance. According to district survey respondents, the majority of districts (70 percent) have had this type of system for six or more years."¹

¹ See *Use of Education Data at the Local Level: From Accountability to Instructional Improvement*, U.S. Department of Education, Office of Planning, Evaluation, and Policy Development (Jan. 2010). Available online at: <https://www2.ed.gov/rschstat/eval/tech/use-of-education-data/use-of-education-data.pdf>

School districts regularly employ a variety of technologies to communicate with parents, such as parental notification via email or text, writeable eForm files, eSignatures, and parent portals or other online or mobile user interfaces for parents to provide and update required information. Information collected can also be shared with parents. Digital processes and formats can expedite timelines, save parents time completing forms, save school districts time by reducing manual data entry, reduce data entry error, save school districts money by reducing staff time and paper (purchasing, mailing, processing), and present information in a format that can be more easily managed and processed. Further, electronic signatures are recognized by law and in technical and legal standards, and enable the electronic completion and processing of forms and other documents requiring legal signature.

As the US Department of Education moves forward on this important issue, we encourage the Impact Aid Program Office to coordinate and work directly with the Office of Education Technology and the US Digital Services. Additionally, the US Department of Education should work with the Impact Aid community and the private sector to develop viable solutions to update this program. This modernization would certainly align with the Obama Administration's ConnectEd initiative that supports K-12 schools in their transition from print to digital. Ultimately, we expect Impact Aid grantees to significantly enhance their use of technology to create a more efficient, cost-effective, timely and accurate process that will best serve schools, families and taxpayers.

Sincerely,

AASA, The School Superintendents Association
American Federation of Teachers, AFL-CIO
Association of Educational Service Agencies
Association of School Business Officials International
CoSN – the Consortium for School Networking
Data Quality Campaign
International Society for Technology in Education
National Association of Elementary School Principals
National Association of Federally Impacted Schools
National Association of Secondary School Principals
National Education Association
National PTA
National Rural Education Advocacy Coalition
National Rural Education Association
Software & Information Industry Association
State Educational Technology Directors Association