

ASBO INTERNATIONAL 2023–2024 U.S. LEGISLATIVE BELIEFS

ABOUT ASBO INTERNATIONAL

The Association of School Business Officials International (ASBO) provides programs, resources, services, and a global network to school business professionals who are the finance and operations leaders in school systems. ASBO members manage school budgeting, purchasing, facility operations and maintenance, safety and security, human resources, technology, transportation, food service, healthcare, and other areas of education administration and operations. ASBO International promotes the highest standards of school business management, professional growth, and the effective use of educational resources.

School business professionals are trustworthy leaders who are committed to educating the whole child by effectively managing educational resources to support student learning and well-being. As school business professionals strive to ensure that taxpayer resources are utilized wisely in their communities, implement innovative education practices, and lead the profession forward—ASBO International is here to support them.

SETTING STUDENTS & SCHOOLS UP FOR SUCCESS

As school finance and operations leaders, ASBO International members are uniquely qualified to help policymakers understand the impact of COVID-19 on education. School business professionals can help policymakers identify where additional resources are needed to sustain education recovery efforts and address the rising academic, social, emotional, mental, and physical health needs emerging in their school communities.

Instability in education finance is a significant concern for school district leaders. Schools require adequate staff and resources to effectively educate and provide students with quality programs, services, and opportunities. Although Congress disbursed significant federal aid to help schools respond to the pandemic, this emergency funding is not sufficient to address all inequities in education stemming from years of underinvestment before COVID-19, or resolve all post-pandemic needs, either.

While this one-time stabilization aid is greatly appreciated, strong and sustained annual funding is critical to set students and schools up for success in a post-COVID era. Districts need effective, ongoing state and federal partnerships to sustain pandemic recovery

initiatives, including those that are essential to supporting students' academic recovery, safety, and overall well-being.

Once federal COVID-relief funds expire, many districts will face a fiscal cliff because these resources are no longer available to support new programs, initiatives, and additional positions created to address student needs during the pandemic. School business professionals advocate that one-time federal emergency relief be used for fiscally responsible, non-recurring investments such as new textbooks, devices, and supplies to support student learning; short-term contracts and one-time bonuses to recruit and retain quality educators; and facility projects to improve public health and safety. However, depending on the specific financial circumstances, some districts may still be forced to cut costs to balance their budget by eliminating staff and services at a time when more investments are needed. In addition, some districts have achieved promising academic recovery using federal relief funds and need continued support to sustain those gains to mitigate COVID-linked learning challenges.

The future of school finance is increasingly unstable with variable enrollment and declining revenues; rising health, labor, and pension costs; persistent staffing, supply chain, and inflation challenges; increasing unfunded mandates; and unsustainable maintenance costs for buildings and facilities in disrepair. State and local education leaders cannot solve these challenges alone—they need federal support to secure a better future for our children.

ASBO INTERNATIONAL U.S. LEGISLATIVE BELIEFS STATEMENT

1. We believe that targeted, robust federal funding with minimal administrative burden is an important part of a school system's revenue.

We support fiscally responsible federal investment in education to supplement and support local efforts to ensure all students have equitable educational opportunities. Federal education funding must be protected and prioritized in federal budget conversations; education funding must not be cut for other federal priorities.

We believe that federal support for schools in response to the COVID-19 pandemic must include a high bar for states asking to waive their maintenance of effort (MOE) requirement coupled with a need to ensure any MOE flexibility for states is similarly available for school districts.

We support that public dollars should fund public schools. Schools that receive public funding must adhere to the same rules for enrollment, academic standards, performance, equity, procurement, conflict of interest, accountability, and transparency. Privatization of education undermines our public school system and denies equitable educational opportunities for students. We oppose private school choice/voucher programs, which funnel taxpayer dollars away from public schools into private and/or parochial schools that are not held accountable to the same standards.

We support full federal funding for education programs authorized by the Every Student Succeeds Act (ESSA), Individuals with Disabilities Education Act (IDEA), and Carl D. Perkins Career and Technical Education Act (Perkins/CTE). We support equitable federal funding mechanisms, including key federal programs such as Title I and IDEA, as well as a robust conversation to revise and strengthen the efficacy of poverty indicators within federal education programs. Congress should fully fund formula grants that reflect its commitment to supporting historically disadvantaged students, economically disadvantaged students, students of color, English learners, and students with disabilities.

- We believe Congress should prioritize funding formula grant programs over competitive grants in its education agenda. Formula grants represent a more stable, predictable funding source for school districts, which require fiscal and financial stability to undertake the ambitious reforms often proposed by competitive grant programs. We seek federal support to eliminate red tape, bureaucracy, and overly stringent mandates associated with applying for and reporting on the use of federal grant dollars. Simplifying and streamlining federal grant processes will encourage all districts to apply for available funds and free up school staff, time, and resources to focus more on students' needs.

- We believe Congress should fully fund IDEA at 40% of the national average per-pupil expenditure (NAPPE) to address extra costs incurred when educating students with special needs and to fulfill Congress' original promise to support students with disabilities. Fully funding IDEA will enable districts to utilize state and local funds toward addressing other student needs and local initiatives.
- We believe that IDEA, Part B Maintenance of Effort (MOE) requirements should conform to MOE requirements under ESEA/ESSA. Congress and the U.S. Department of Education (USED) should also provide narrow, targeted flexibilities to districts for meeting IDEA, Part B MOE requirements. Districts need reasonable accommodations to address this underfunded mandate, especially when circumstances are beyond the district's control. Districts should have greater flexibility to reduce local MOE levels if the provision and quality of services for students with disabilities are unaffected.
- We believe Congress should increase funding for ESSA Titles I, II, III, IV, and V formula grants. ESSA provides state and local leaders flexibility and autonomy over their classrooms, but their success will ultimately depend on how well ESSA programs are funded. While we believe formula grants should be prioritized, we also support adequate funding for Titles II and IV competitive grants for quality professional development, after-school and extracurricular activities, and other vital programs.
- We believe Congress should increase funding for Perkins/CTE state grants to support education programs that offer alternative pathways for students to succeed and ensure our nation has a highly qualified workforce.

2. We believe that federal funding and support are critical for schools to construct, maintain, and repair facilities and ensure that students have safe and healthy places to learn.

We support a fiscally responsible federal infrastructure plan that incorporates K–12 schools into its broader agenda. Federal investment in K–12 infrastructure should include, but not be limited to, direct state and local funding; competitive grants; investing in partnerships to support projects (e.g., public/private [PPP], federal, state, and local, etc.); restoring qualified tax-credit bonds [QZABs/QSCBs] and tax-exempt advance refunding bonds (ARBs); and other options to help schools sustainably construct, repair, and maintain facilities.

- We believe safe and healthy school environments significantly impact student learning and well-being. School infrastructure and safety issues are inextricably linked; it is impossible to address one issue without addressing the other. Schools are charged with increasing responsibilities to protect students without sufficient funding and support to accommodate new demands and emerging threats. Whether a school must improve facility conditions, increase physical or cyber security, or provide new learning spaces to meet personalized learning goals, these initiatives cost time and resources that most public school systems lack.
- We believe school districts should have more flexibility with spending timelines for federal ESSER funds, particularly when carrying out allowable school facility projects. We urge the U.S. Department of Education to provide clear, timely, and achievable guidance for states and districts to apply for late liquidation extensions for ESSER funds. Supply chain issues, labor shortages, and other economic circumstances outside of districts' control have made it untenable to liquidate funds by the original statute deadlines.
- We believe reducing, simplifying, and streamlining grant application and reporting requirements for schools and districts to receive federal funding for K–12 infrastructure projects. Excessive administrative, paperwork, and compliance burdens relative to voluntary grant applications often deter school districts from applying for financial assistance. This especially pertains to smaller, less-resourced schools that stand to benefit most. We welcome the opportunity to work with federal agencies and other K–12 stakeholders to ensure infrastructure grants and requirements are accessible and easily navigable for applicants.

We support the federal government playing an active and supplementary role to help schools improve infrastructure and safety issues, including: 1) addressing public and environmental health concerns (e.g., disaster response and recovery, mitigating the spread of viruses and diseases, addressing radon, lead, asbestos, mold, etc.); 2) improving school safety and climate (e.g., securing facilities, hiring and training staff, providing social-

emotional care, addressing cyberbullying, etc.); and 3) providing inclusive facilities to accommodate all students' educational needs (e.g., accelerated learning and recovery programs, full-day PreK, CTE/vocational training, STEM classes and maker spaces, special education, etc.).

- We believe the burdensome application process for the Federal Emergency Management Agency (FEMA) Public Assistance (PA) program must be streamlined to provide districts with quicker and easier access to desperately needed funds so that students may safely return to school after a disaster has occurred. The federal program must be updated to respond to many different types of disasters in a more flexible and effective manner, including epidemics and pandemics. FEMA should also proactively work with school districts to provide information and technical support regarding other available emergency assistance programs to help school communities effectively respond to and recover from crises impacting their area.
- We believe that FEMA's strict procurement requirements inhibit recovery efforts when districts are challenged to find available contractors and must delay facility repairs to endure the time required to comply with competitive-bidding procurement rules. We strongly advise FEMA to accept whatever procurement method the state has adopted as a default. In addition, FEMA's current reimbursement policies are too restrictive and undermine the PA program's effectiveness to help communities recover from crises. Reimbursement requirements should be more flexible and adaptable to quickly address immediate emergency needs.
- We believe all students, educators, and families deserve safe schools and communities free from violence, intimidation, and fear. Students cannot learn, educators cannot teach, and parents cannot send their children to school if they feel unsafe, anxious, or afraid. Every school district should have comprehensive districtwide and school emergency preparedness policies, plans, and procedures to keep schools safe from a variety of threats—including gun violence. However, educators cannot and should not carry this burden alone. School communities need substantial resources and support, not mandates, from local, state, and federal authorities and agencies to coordinate crisis prevention, mitigation, response, and recovery efforts.
- We believe Congress should provide additional funding via already existing federal programs to support school safety, security, and crisis prevention, management, and recovery. This includes, but isn't limited to, ESSA Title IV, the Readiness and Emergency Management for Schools (REMS) program, and the STOP School Violence Act and COPS Office grants to support a variety of school climate, safety, and security needs. The U.S. Departments of Education, Justice, and Homeland Security should enhance coordination and collaboration to assist schools with identifying grant opportunities, best practices, tools, and resources to improve school facility safety and security.

- We believe the federal government should support safe school communities by enacting common-sense gun safety legislation, which includes but is not limited to the following solutions. 1) increasing funding for rigorous research to identify the root causes of gun violence; 2) assessing the impact of school safety strategies on school shootings; 3) identifying strategies to prevent gun violence in schools; 4) increasing enforcement of existing gun control and safety laws.
- We believe the federal government can help enhance district technology infrastructure and student data privacy by 1) updating federal laws and definitions to address the realities of the digital age, making it possible to protect data while ensuring appropriate use of student data for legitimate educational needs and reforms; and 2) ensuring funding to support school districts in ongoing efforts to respond to cybersecurity threats and breaches, including technology, training, and updates to infrastructure.

We support preserving funding for and strengthening the federal E-Rate and Emergency Connectivity Fund (ECF) programs to help school communities bridge the digital divide or “homework gap” for those who lack reliable broadband access to effectively participate in and benefit from information technology for learning. The E-Rate and ECF are critical programs to improve digital equity and broadband connectivity both within and outside the school campus, at students’ homes, and across their communities.

- We believe the federal government should play an active role in helping schools address cybersecurity and other technology issues. Funding for such initiatives should be outside of and in addition to existing education and school-related connectivity programs. Any federal response to cybersecurity threats should be comprehensive, incorporate cross-agency resources and expertise, and be adequately funded. E-rate should not be the initial or primary source of funding for a federal cybersecurity response.
- We believe that the U.S. Department of Agriculture (USDA) Rural Utilities Service (RUS) Telecommunications Program provides beneficial loan and grant opportunities that can help narrow the digital divide for rural communities. RUS programs should be strengthened and preserved to incentivize broadband infrastructure investment and development in unserved and underserved areas so that rural communities can access more affordable and reliable services and benefit from improved educational, health, and employment opportunities.

3. We believe that schools require a sustainable nutrition program business model with minimal administrative burden that provides affordable, nutritious meals that students will enjoy.

We support efforts by the federal government to reduce, simplify, and streamline regulations for child nutrition programs to reduce the administrative burdens and costs of managing school meal programs. We believe the federal government should play a supportive, flexible role in helping states and school districts comply with meeting reasonable and achievable nutrition standards and offer quality non-regulatory guidance, technical support, and professional development for administering meal programs.

- We believe the federal reimbursement rates for school meals should be increased to ensure school nutrition programs are financially sustainable, and that reimbursements should be provided to schools when federal food service requirements result in a loss of revenue. We also urge the federal government to refrain from increasing administrative burdens related to nutrition eligibility verification.
- We believe Congress and USDA should leverage lessons learned from implementing pandemic-related child nutrition program waivers to identify areas where permanent flexibility can be granted to states, districts, and schools to feed children more effectively and efficiently and encourage greater program participation. Waivers granting critical flexibilities that provided universal access to free meals; addressed stigmas, paperwork burdens, and unpaid meal debt; allowed flexibility in how meals were served; provided higher reimbursement rates; and helped districts navigate supply chain and labor issues have all significantly supported food service operations in practical, sustainable ways without jeopardizing meal nutrition and quality.

We support having the federal government play a supportive rather than regulatory role in helping states and districts solve unpaid meal debt and “lunch shaming” issues rather than increasing regulations and restricting local autonomy. It is not the school district’s goal to shame students or their families if they incur a negative meal account balance, but rather to work with them to resolve unpaid debts.

- We believe the USDA and other federal agencies can provide non-regulatory guidance and resources to help states, districts, and schools develop fiscally sound and fair policies to recover costs, collect debt, eliminate stigmas from serving and eating free/reduced-price meals, and still ensure students have access to affordable and nutritious food.

We oppose nutrition reforms that would adversely affect the financial structure of, federal funding streams for, or student access to, child nutrition and school meal programs. This includes capping federal payments to states for school meal programs via block grants, increasing the eligibility threshold for schools and districts to enroll in the Community Eligibility Provision (CEP) program, and other reforms that would adversely affect students and districts regarding direct certification for school meal programs.

- We believe that capping funding streams via state block grants will reduce funding for schools to administer meal programs. (Block grants would provide states fixed funding instead of federal reimbursements per eligible meal served.) Block grants do not provide states relief in the event of a recession, rising child poverty, increases in enrollment/meal program participation, and rising food prices and school meal costs.
- We believe that the CEP is an effective federal program that enables high-poverty schools and districts to provide meals to all students at no charge, improves meal program participation and efficiency, and reduces paperwork burdens for K–12 districts. Currently, a school or district is CEP-eligible to serve all students school meals at no charge if 40% or more of its students are eligible for free or reduced-price meals. The CEP should be strengthened and expanded by 1) reducing the eligibility threshold for a school or district to opt into the program so more students can access nutritious meals at no cost, and 2) increasing the Identified Student Percentage (ISP) multiplier in CEP's formula so schools and districts can sustainably afford to operate food service programs.

We support a universal meal policy, provided that it would not harm eligibility for, and enrollment in, existing federal funding streams serving schools, and would fully cover costs associated with operating the program in schools. We recognize the impact that implementing such a policy would have on limiting districts' ability to collect meal applications, and the adverse implications of using inaccurate or incomplete meal program data for equitable resource allocation when free/reduced-price meal eligibility is an often-used proxy measure to identify poverty.

- We believe that as more schools and districts seek ways to expand student access to free school meals (e.g., opting into CEP or a state-level universal meal program), collecting meal applications will only become more challenging. Free/reduced-price meal eligibility will gradually become an increasingly unreliable poverty metric and become more problematic for facilitating equitable resource allocation to students. We urge policymakers to consider how to revise and strengthen the efficacy of poverty indicators that impact federal nutrition (and other education-adjacent) programs to address these emerging trends.

4. We believe that schools need adequate federal support to address emerging health and labor challenges affecting the education field.

We support federal efforts to increase the amount of funding and quality of training, technical support, and other guidance and resources to assist school systems with implementing healthcare and labor regulations. We welcome any opportunity to work with federal offices and agencies, and public health and education stakeholders to improve regulations and services affecting our nation's school systems.

We support the reduction, simplification, and streamlining of current Affordable Care Act (ACA) regulations to reduce the administrative burden and costs to school systems to comply with the law. We support changing the definition of a full-time employee (FTE) who qualifies for health insurance from an individual who works an average of 30 hours/week to 35 hours/week and exempting substitute teachers and other variable-hour employees from coverage under the ACA. We urge lawmakers to refrain from reinstating costly, burdensome requirements that would be difficult for school district employers to implement.

We oppose healthcare reforms that would adversely affect the financial structure or funding streams of the federal-state Medicaid and Children's Health Insurance Program (CHIP). This includes limiting federal payments to states via per-capita caps based on enrollment or block grants, neither of which provide states relief in the event of a recession, public health crisis, or other emergencies. Schools rely on \$4 billion annually in Medicaid dollars to provide vital student health services to children, especially those with disabilities and from low-income families that cannot afford access to these services elsewhere.

- We believe that capping or reducing Medicaid and/or CHIP funding to states hinders states' ability to reimburse Medicaid-eligible service providers, including hospitals, clinics, and schools. The current financing structure of Medicaid should be preserved and ensure that eligible mental health services in schools are reimbursable under the program.
- We believe Congress should increase investments in the school-based Medicaid program and work with the Centers for Medicare and Medicaid (CMS) to streamline program processes and requirements. CMS should continue to proactively engage school district stakeholders on ways to improve the program and provide user-friendly technical guidance so that all districts can participate and receive reimbursements for providing much-needed services to children. We also urge the federal government to collaborate with states and districts to expand access to Medicaid-reimbursable mental and behavioral health services in schools.

- We believe additional federal investments are needed to improve our nation's public healthcare system and healthcare workforce pipelines and address the mounting social, emotional, behavioral, and mental health issues that have emerged since the pandemic in school communities across the nation, for students, staff, and families alike.

We support reasonable and financially sustainable reforms to federal labor laws and regulations concerning minimum wage, overtime pay and eligibility, recordkeeping, and other employment issues that affect school districts.

We support strong and sustainable federal investments to strengthen labor pipelines and qualified candidate pools within the K-12 public education sector. This includes but is not limited to federal funding, technical support, professional development and training, non-regulatory guidance, and other resources to help school district employers recruit, hire, train, and retain high-quality staff. Schools require sufficient qualified instructional, administrative, operational, ancillary, and other support staff to provide students with an equitable education and effective wraparound services to support their individual needs.

- We believe additional federal investments are needed for higher education institutions to partner with school districts on building sustainable labor pipelines.
- We believe in increasing funding for programs that can help recruit, train, and retain school psychologists, social workers, mental health counselors, and other specialized support staff—especially in high-need communities. The U.S. Departments of Education and Health and Human Services should enhance coordination and collaboration to assist schools and school-based providers with addressing the mental and behavioral health needs of students, educators, and communities, including identifying grant opportunities to support related initiatives.

ASBO INTERNATIONAL MEMBERS ARE WILLING PARTNERS

ASBO International and our members offer our experience, expertise, and interest in creating a world-class education system for all students. We welcome the opportunity to work with federal policymakers in meeting the significant financial and operational challenges that schools face.

ASBO International's Legislative Advisory Committee (LAC)

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