



June 18, 2019

Ms. Nancy Potok  
Chief, Statistical and Science Policy  
Office of Information and Regulatory Affairs

**Re: OMB 2019-0002**

Dear Ms. Potok:

We are writing on behalf of the Association of California School Administrators and the California School Boards Association (ACSA-CSBA Federal Partnership) in response to the Office of Management and Budget's (OMB) request for comments regarding the consumer inflation measures produced by Federal statistical agencies. We respectfully urge the Office of Information and Regulatory Affairs to make no immediate changes to the indices currently being used, particularly the Consumer Price Index for All Urban Consumers (CPI-U). Further research should be completed and additional public input should be sought before OMB makes a decision about these measures.

ACSA's more than 17,000 school leader members and CSBA's 5,000 locally elected school board members support the federal programs that assist California's 6.2 million local students. Changing federal inflation measures without proper consideration could negatively impact the administration of vitally important programs that help students, including health and nutrition initiatives, such as Medi-Cal and CalFresh.

Adopting an alternate inflation measure in place of the CPI-U, without fully exploring this change's potential effect, could negatively impact low-income Californians by further suppressing the federal poverty line. California's cost of living already far outpaces the federal poverty line. Poor inflation measures could exacerbate that problem by underestimating the cost of living increases in our communities, leaving even more California students without the federal and state services they need to stay in school and otherwise develop into productive members of our communities.

Despite the fact that this request for comment states that this would be changing the federal poverty thresholds only, with no effect on the guidelines, these thresholds are in fact the basis for the federal poverty guidelines which are used to determine eligibility, benefits, and funding levels for supports that would help families and individuals meet their basic needs. Particularly

in California, where the average cost of living can be very high in certain areas, this could be devastating to our population. The alternate measures proposed may not produce more accurate calculations of the federal poverty line. Due to these uncertainties, as well as the effect this change could have on individuals and families within our state, it is clear further research is needed before OMB makes a final decision.

The Administration should determine specifically whether a change would significantly reduce individuals' and families' access to vital public supports. Without careful consideration to this issue, many families in our state could be without necessary public supports, leading to harm to many of our students.

We appreciate your consideration of these comments. If you have any questions about our concerns, please let us know.

Sincerely,



Erika K. Hoffman  
Legislative Advocate  
California School Boards Association  
[ehoffman@csba.org](mailto:ehoffman@csba.org)  
(916) 669-2553



Adonai Mack  
Senior Director of Federal Relations  
Association of California School Administrators  
[amack@acsa.org](mailto:amack@acsa.org)  
(916) 329-3821