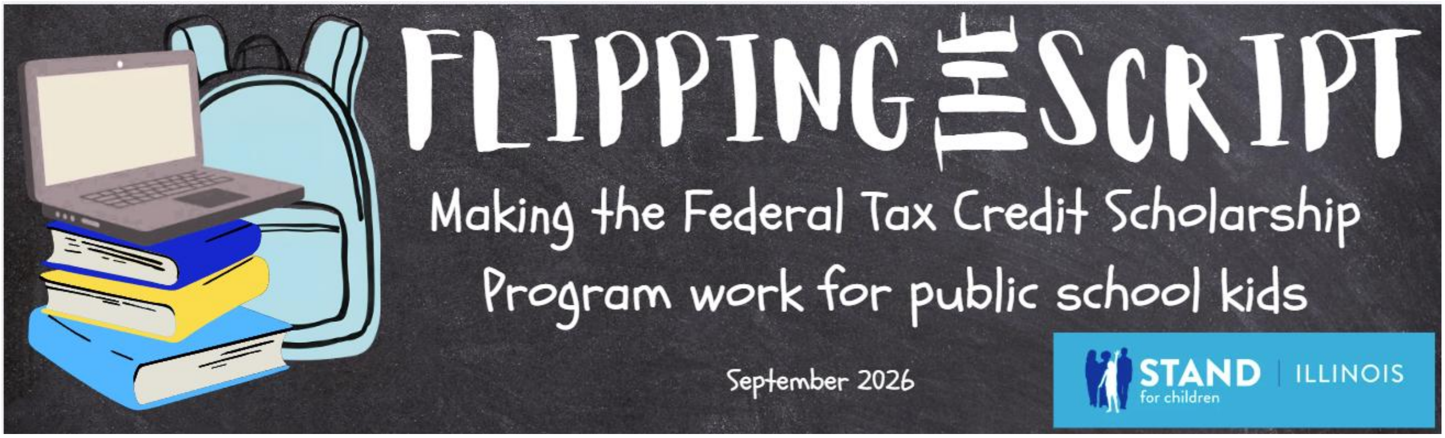


EXECUTIVE SUMMARY

The question before us is not whether to support the federal law allowing taxpayers to divert $1,700 of their federal taxes to student scholarships. That law already exists. Taxpayers in every state will be eligible for the credit. The question is whether Illinois will opt in for Illinois students to access scholarships.

This report argues that Illinois should opt in, but that is just the first step. We should also take steps to maximize the benefits for public school students. If every eligible Illinois taxpayer chooses to divert their $1,700 from the federal government to scholarships, it could mean up to $6 billion in funding for Illinois students each year. But without strategic outreach to taxpayers and streamlined processes to donate, Illinois will leave almost all of that funding on the table - even if we opt in.

From school leaders to employers to state policymakers, there are steps everyone can take to strengthen the impact of the program for public school students and enhance equity.

- School principals or superintendents can identify partner Scholarship Granting Organizations (SGOs), offer optional payroll deductions and modifications to their employees, recruit other community employers and partners to join the payroll deduction offer, and intentionally refer students in need for scholarship opportunities.
- SGOs can prioritize lower-income students for scholarships.
- Taxpayers can selectively decide to which SGO they will donate based on the mission and commitment to equity and public schools.
- State policymakers can take quick action to opt in so public-school-supporting SGOs have time to be created, thoughtfully develop audit procedures for SGOs, offer automatic payroll deductions to state employees for preferred SGO(s) with a focus on public school students, and clarify fee waiver law to generate more resources for schools.

We come to this work with a strong commitment to strengthening public schools and ensuring equitable access for students. It is because of that commitment that we support opting in. A thoughtful and intentionally-structured program has the potential to be a boon for public schools. In fact, the only way to ensure the program does nothing for public school students in Illinois is to opt out altogether.

Preface

Think back to 2010 when the Affordable Care Act ("Obamacare") first passed. There was a lot to it, including the opportunity for states to opt in to Medicaid coverage expansion at no cost to states until 2020 when a mere 10% of costs would shift back to states.

We all had our opinions, and they often came down to our political affiliation. All the blue states opted for expansion. Eventually, most of the purple and red states did, too. A lot of Democrats were watching from the sidelines, thinking how ridiculous it was that any state would deny low-income people health care out of spite. Ten states have still never opted in.

If Obamacare presented a challenge for red states, the tax credit scholarship program represents an analogous conundrum for blue ones. The Federal Tax Credit Scholarship program (FTCS) was one component of the so-called "One Big Beautiful Bill Act." The decision whether to opt in rests with each governor. All the Republican governors have opted in for scholarships, as have a handful of blue states (Colorado, Kansas, Kentucky, New York, North Carolina, and Virginia). As for the rest, like Illinois, we are still undecided. If blue states decide not to participate, blue state taxpayers can still "donate" (at no cost to themselves) to scholarships for kids in other states.

There are two ways funds can flow to public school students: (1) School districts set up partnerships with SGOs, increasing funding to school districts to serve eligible students, thereby increasing services or reducing costs, and (2) Families seek out SGOs to obtain scholarships for their children. Service providers could be high-impact tutoring organizations, vocational training programs, and after-school and summer programs. Illinois taxpayers can contribute to Scholarship Granting Organizations (SGOs) and take the dollar-for-dollar tax credit regardless of whether Illinois opts in; however, opting in is the only way scholarship funds become available to Illinois students.

We support Illinois opting in to the program – and we have ideas for how the state can take steps to enhance equity, bolster public school funding, and make the most of the program.

Values and Expectations

After Stand for Children's June 10 townhall, we convened a coalition of public education advocates to rapidly examine how Illinois might take the controversial federal education tax credit and turn it into funding to support evidence-based programs for students in need.

Our values:

- Every student deserves access to equitably-funded, well-resourced public schools and evidence-based programs and practices.
- State officials and education advocates have an obligation to promote scholarship granting organizations that operate with high standards of quality and ethics, especially in the absence of typical rules and oversight.
- Illinois students - not politics - should be at the heart of this conversation.

Our expectations:

- Many Illinois taxpayers will prefer giving $1,700 to education rather than to the IRS, whether or not Gov. Pritzker opts in.
- Scholarship organizations for public school students have the potential to capture the majority of donations, but this depends on opting in quickly and developing public-school-centric infrastructure.
- Illinoisans will find it difficult to justify why students in other states can access these resources, while Illinois students cannot, if Gov. Pritzker chooses not to opt in.

About the Federal Tax Credit Scholarship Program

In 2027, a federal tax credit will take effect allowing taxpayers across the United States, including in Illinois, to claim a credit of up to $1,700 for donating to qualified Scholarship Granting Organizations (SGOs). SGOs can award scholarships to cover a wide variety of expenses, from student enrollment in public school services to private school tuition. Final Department of Treasury regulations are anticipated in September. A preview of guidance was released in June. If every eligible Illinois taxpayer contributed, the program would generate about $6 billion every year. Realistically, without a systemic approach, it is more likely that a small fraction of eligible people will contribute.

This is not Invest in Kids 2.0

Although Illinoisans are familiar with the concept of tax credit scholarships from the Invest in Kids program, which sunset in 2023 after six years of operating, the programs are quite different. While the Invest in Kids tax credit was only available for private school scholarships, the FTCS can fund a broad array of program types, from private school tuition to public school fees, extracurriculars, after-school programs, summer camps, dual enrollment, career and technical education fees, literacy tutoring, and other supports.

Invest in Kids allowed Illinois taxpayers a 75% credit up to $1 million in donations, for a total cost of up to $75 million. That $75 million cost could be reached with outreach to relatively few high net-worth individual donors. But the FTCS cap per person is much smaller at just $1,700, while the program cap is unlimited. Every taxpayer can receive a dollar-for-dollar credit up to $1,700.

There were just eight SGOs during the last year of Invest in Kids. Under the FTCS, significantly more are anticipated, likely in the hundreds, including national and multi-state organizations. Those groups will solicit donations from Illinois taxpayers, regardless of whether Illinois opts in.

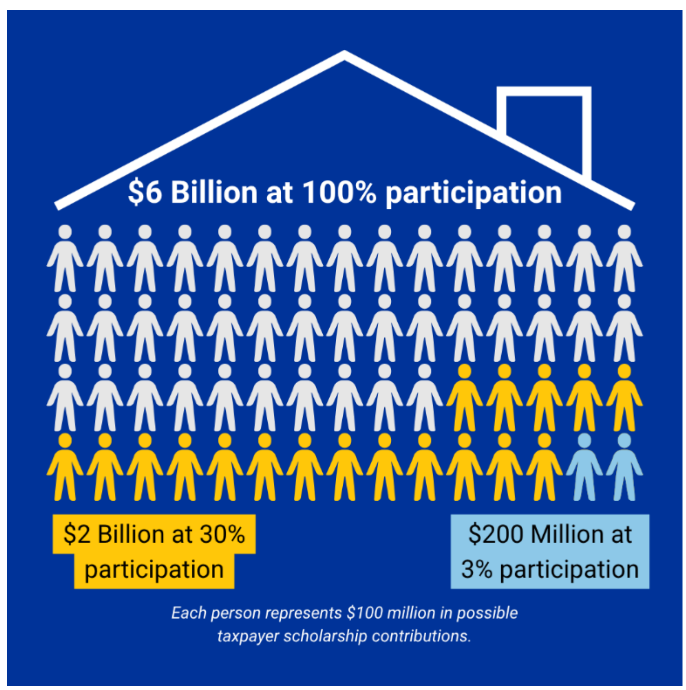
A final point of distinction between the two is with family income for scholarship recipients. Invest in Kids offered scholarships to students in families up to 300% of the Federal Poverty Level, about $100,000 for a family of four. The FTCS income range is significantly higher at 300% Area Median Income, about $360,000 in Cook County. Nearly 90% of students qualify for a scholarship under these parameters.

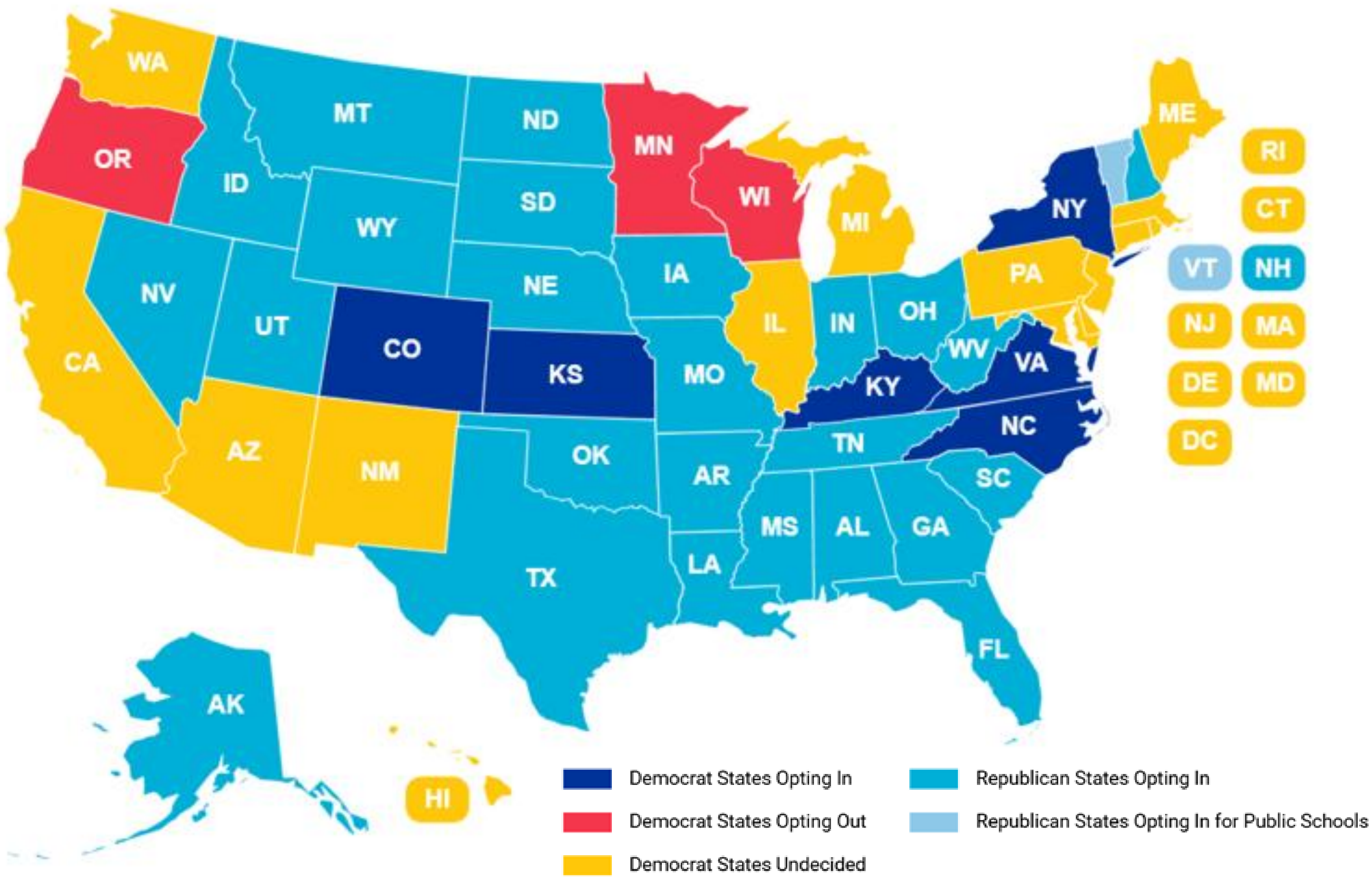
	Invest in Kids	Federal Tax Credit Scholarship
Types of Scholarships	Only private schools	Public and private schools
Family Income Limits	300% FPL (about $100k)	300% AMI (about $360k in Chicago area)
Tax Credit Per Taxpayer	75% credit up to $1 million	100% credit up to $1,700
Program Cost	Up to $75 million	No limit
Scholarship Granting Organizations	8 SGOs gave 10k scholarships annually	Many SGOs expected, including national and multi-state orgs

How much money are we talking about for Illinois?

The amount the FTCS raises depends on several variables and the fine print in the federal regulations. One outstanding question is whether married taxpayers filing jointly can contribute $1,700 or $3,400. If everyone eligible opts to donate, the program could see $5 - $6 billion in scholarships, according to estimates from the Bipartisan Policy Center and Democrats for Education Reform (DFER).

More realistically, participation will depend significantly on the persistence and creativity of states. DFER estimates that 30% participation is plausible for proactive states, though typical participation in these sorts of state programs is closer to 2 - 3%. At 30% participation, SGOs could see $1.6 - $2 billion. The $160 - $200 million generated at 3% participation is still significant, though the lower the participation, the less likely public schools and students furthest from equity are to reap the benefits.





State of the States Opting In

All states with Republican Governors have opted in. Democratic-led states are in a trickier predicament. Democratic Colorado Gov. Jared Polis quickly opted in and spoke out in support of the program: *"The more Democratic governors learn about it, I fully expect that most will come around and participate, because from our perspective, it's free money."*

Four Democratic governors, on the other hand, announced they would not participate (Wisconsin, Oregon, Hawaii, and New Mexico).

All but Wisconsin reversed course and said they would wait for release of the regulations, and Oregon re-announced its opt-out after the preview of guidance was released in June. Minnesota has also said it will not participate.

New York has indicated it plans to opt in.Three Democrat-governed states with Republican majority legislatures passed legislation and veto overrides requiring opt-in: Kansas, Kentucky, and North Carolina. A Republican majority in Arizona included opt-in in a budget bill that the Democratic governor vetoed and there has not been an override. Rhode Island passed a law, which the governor signed, requiring the legislature to opt in if the state were to participate.

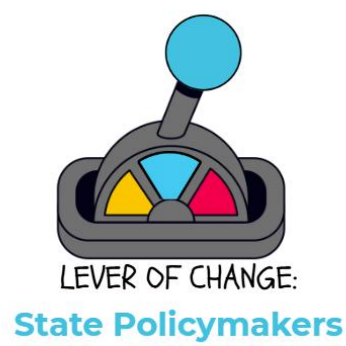
Vermont, which has a Republican governor and Democratic majority legislature, enacted a law opting the state in with the caveat that the governor's list only include SGOs that restrict grants and scholarships to nonprofits with a mission of providing educational opportunities to economically underprivileged students, provided only to students who attend public and independent schools that do not discriminate against any student based on race, religion, sexual orientation, gender identity, or disability. The preview of guidance suggests that states will not be able to apply this level of discretion to their SGO lists.

Virginia is another interesting case, where the outgoing Republican governor opted the state in early January and submitted a list of SGOs before the transfer of power to his Democratic successor. There remains a question whether she can revoke the decision to opt in, though governors do have a renewal decision to make each year. A bill was filed, which stalled, that would have indirectly deterred private schools from participating by requiring any school that accepts scholarships to take state assessments, receive accountability ratings, follow nondiscrimination rules, submit financial audits, and adhere to teacher licensing requirements.

Illinois saw its own handful of bills introduced over the last year. There was one Democrat-sponsored opt-in bill: SB 3776 (A. Johnson). Most were sponsored by Republicans: HBs 4098, 4099, 4200, and 4201 (McCombie), HB 4148 (J. Davis), HB 4974 (Keicher), SR 383 (Chesney), and HR 427 (Halbrook). A bill was also filed prohibiting opt-in: SB 3966 (Guzman). None were assigned to substantive committees.

Maximizing the Impact for Public School Kids

The preview of guidance the Department of Treasury released in June suggests that states will not have much veto power over which Scholarship Granting Organizations (SGOs) end up on their SGO list. This has led some people to assume there is not much states can do to impact how scholarship resources are directed, short of the fundamental question of whether states opt in or opt out. However, opting in is just the first step of many that state policymakers, local school leaders, employers, service providers, families, and taxpayers can take to maximize equity and impact for public school students.



First, opt in. At this point, federal regulations have taken months longer than anticipated and a preview of guidance has been released. The desire to wait for final regulations is understandable and, frankly, wise. But it must be balanced with the need to act quickly so public-school-supporting SGOs have time to build and be ready to go in January 2027. Private schools have the ability to flip a switch and go back to administering scholarships, as they did during Invest in Kids and as some still do now without the tax credit. But this will be new for public schools, which lack the technical assistance and infrastructure. They need time to get their SGOs established, so opting in as soon as possible is advisable.

Based on the preview of guidance, it appears that states will not have the ability to restrict which SGOs get added to the list. (Though this was not what we wanted, it may be better for the country on the whole because red states cannot restrict public schools from receiving scholarships either.) Still, there are three ways the state can have some control over SGO qualification:

- States will be required to verify a third-party audit of SGOs and hold SGOs accountable for preventing fraud and double counting of scholarships. This process is an opportunity to add a layer of scrutiny to ensure programs are maximizing investment in scholarships for students rather than overhead.
- To become a 501c3, an SGO must first file Articles of Incorporation in Illinois before filing an IRS application.
- Finally, state definitions of "school" may provide some ability to narrow scholarship recipients.

Though the state will likely end up with little ability to restrict which SGOs make it onto the list, it can absolutely provide transparency around who SGOs fund and what priorities are in their mission through a searchable database. This could not only help taxpayers decide where to donate, but it could provide direction to schools and employers looking for reputable SGO partners whose values align with their own. Illinois can also consider looking to the stalled proposed law in Virginia requiring scholarship-accepting programs to adhere to certain non-discrimination parameters and equity priorities.

Illinois law allows schools to charge fees, but requires waivers for all low-income students. This leaves the question of implementation if schools and SGOs partner to charge and cover new fees. State law should clarify that scholarships may cover the fee for low-income students, so long as the fee is never actually passed on to a low-income student.

Many of the same recommendations that apply to other groups are also relevant for state-level policymakers, but the scale is much larger and holds even more potential to make a difference for equity. For instance, *offering automatic payroll deductions to a specific SGO or menu of high-quality, public-school-supporting SGOs to every state employee could generate up to $250 million.* A similar opportunity could be extended to public pensioners, generating up to $400 million. (Although pension income is not taxable at the state level, it is still subject to federal income tax.) The Department of Revenue can include awareness of these opportunities and lists of priority SGOs with tax communications. And large employers, contractors, and industry partners can be encouraged to offer similar automatic deduction opportunities available to their workforces.

STATE POLICYMAKERS should:

- Use all the allowable tools to hold SGOs accountable, from audits to transparency.
- Enact legislation allowing states to cover low-income student fees through scholarships as long as fees are never passed on to any low-income student.
- Identify a menu of equity-minded, public school-supporting SGOs to support through optional employee, pensioner, and other payroll deductions and tax season Department of Revenue communications.

Perhaps the most impactful player in this equation to drive equity is the school leader, (principals, school board members, and other administrators). Chances of reaching the most underprivileged students in the most evidence-based way will increase if schools lead the local campaign for scholarships.

For example, tutoring during the school day is more effective than out-of-school time tutoring. If schools partner with a high-quality in-school tutoring provider, they will reach more students with higher needs than relying on parents to know the opportunity exists for a scholarship, find a provider, and arrange transportation for their child outside of school. If a rural school has a goal to expand coursework options for students despite limited budgets and teacher shortages, they may target scholarships to enroll students in courses through the Illinois Virtual Course Catalog to bring these opportunities home.

Involved schools can transform community giving patterns. If Scholarship Granting Organizations (SGOs) rely on taxpayers to know the opportunity exists and donate to a public-school-supporting SGO, it is unlikely to generate significant contributions. But *if a school steps up its leadership with an SGO partner, it can create (and encourage local employers to create) optional payroll deductions and adjusted withholdings for its employees, communicate broadly with parents, and build a local culture of donation.*

This would also enable schools to determine the most strategic use of scholarship funds to meet their goals and direct donations accordingly, whether that's broadly covering a new student fee to free up resources to maintain class size (an idea proposed at the Edunomics Lab) or targeting a subset of students with a specific need, like social workers and mentors for students who experienced trauma or tutoring for students reading more than two levels below their grade. Clear communication and directions to simplify giving will turn this from a series of one-off donations to an expected community norm. The American Association of School Administrators and National Association of Education Foundations recently published a thorough toolkit designed for SGOs focused on supporting public schools.

Finally, two cautionary notes: because a fee must exist in order for a scholarship to be paid to cover it, schools may be inclined to add a price tag to services previously provided for free. It is critically important that schools not let the new sticker price of a service exclude or deter any student whose family cannot afford the fee. Schools need to have plans for low-income students who cannot verify income or enrollment in proxy services so those students maintain free access to programs.

In addition, schools that use the scholarship to broadly cover increased student fees in order to fill gaps in school budgets must be mindful of sustainability. If schools have created new programs or balanced budgets on this revenue source, a change in the presidency and Congress could eliminate the program and create a new budgetary hole.

SCHOOL LEADERS should:

- Identify SGO partners aligned to their goals.
- Communicate the opportunity to donate with teachers, parents, and community members.
- Make donating as easy as possible through automatic payroll deductions and adjusted withholdings.
- Be careful with fees so no student is excluded from services their family cannot afford.

SGOs are the cornerstone of the FTCS program. Nothing can happen without them and their importance in the equity conversation cannot be overstated. To become a "qualified" SGO, a 501(c)(3) organization must:

- Spend at least 90% of revenue on scholarships.
- Award scholarships to at least ten students in at least two schools.
- Award scholarships only to students in families earning less than 300% of Area Median Income (AMI).
- Not earmark funds for specific students.
- Prioritize enrollment for siblings of current students.

If a state opts in, preliminary guidance says all SGOs that meet these minimum qualifications must be included on the governor's list. However, SGOs themselves have power to define their mission and tailor their priorities.

Several established SGOs already exist in Illinois to provide scholarships to private school students, and generally, award scholarships to students significantly below the family income threshold of 300% Area Median Income.

Similarly, new SGOs that are created to support public school students will be able to establish priorities to serve the students most in need. Some SGOs will also limit their grants to benefit certain categories of students—like off-track freshman, foster children, gifted students, high schoolers in high-demand career pathway programs, or students below grade level in reading. Though federal law is silent on student outcomes or program quality, a discerning SGO may choose to only fund programs with successful outcomes, and we hope most do apply this filter so resources are invested effectively.

Finally, nothing in the federal law speaks to whether a school discriminates against certain types of students (like students with disabilities or LGBTQ students) or even teaches a racist curriculum. But such programs can only be funded if an SGO awards them a scholarship; SGOs have a moral responsibility to ensure none of their grantees participate in this sort of conduct.

SGOs are essentially middlemen, a pass-through from taxpayers to students. But SGOs are also the key to strong implementation of the program, especially without much federal oversight on quality or focus on lower-income students. The question of an education SGO ecosystem represents a Goldilocks problem: too many SGOs could mean too much competition for limited donors, increasing costs of advertising and overhead. Too few SGOs may mean fewer opportunities for lower income schools to access scholarship resources. Wealthier areas are more likely to have taxpayers eligible to give and more capacity to figure out a way to direct scholarship resources to their local schools, while low income areas are more likely to have taxpayers without $1,700 of net tax liability and less capacity to identify a vehicle for accessing scholarship funding.

The fundamental job of an SGO is fundraising, bringing in lots of relatively small donations from masses of people. This is not fundraising large checks from wealthy donors; this job is about marketing the opportunity to huge numbers of middle-class people. It might take two maxed-out donors to fund just one student in a year-round after-school program. For a new organization, advertising would consume a substantial amount of a start-up budget before donations generate enough scholarships that the overhead costs are less than 10% of the total. Partnerships with schools, community leaders, and existing non-profits with a large reach are preferable to attract a base of donors over starting from scratch.

Illinois policymakers, advocates, and philanthropists should invest in market research to guide segmenting, targeting, and positioning of campaigns to drive taxpayer donations to SGOs focused on equitable services. As a "new to the world" tax credit, investment to help taxpayers understand the options and influence their donation can have a massive return on investment.

For schools that have local public school foundations, this is a likely entity to serve as a local SGO. *The National Association of Education Foundations has created a national SGO that local chapters can join without going through the burden of establishing their own.* This may be a convenient option in many regions to support the local public schools.

One downside to this approach, however, is that school funding in Illinois remains deeply inequitable; therefore, *the more local the fundraising, the more it will mirror the inequities of school funding overall. Local SGOs should be intentional about expanding the region they serve to include less affluent regions for more equitable implementation.*

SCHOLARSHIP GRANTING ORGANIZATIONS should:

- Never fund any program that discriminates against students or uses morally reprehensible curriculum.
- Consider prioritizing a lower family income range than the national law.
- Look at student outcomes and award scholarships to proven providers.
- Prioritize scholarships to under-privileged students and under-resourced areas.
- Partner with schools, businesses, and community leaders for a built-in base of funders rather than over-relying on an expensive marketing campaign.
- Consider serving a broader region so well-resourced communities can fund scholarships in under-resourced areas.

Though schools will often be the service providers, this section speaks to non-profit organizations and contractors that provide supplemental services to public school students, like running after-school, tutoring, summer camp, career training, dual credit, mentoring, enrichment, sports, and other programs.

The level of demand for service providers will undoubtedly increase once the program is implemented, and how much more capacity will be needed in this sector will depend significantly on how effectively public schools operationalize the donation process to their employees, parents, and communities. With literacy tutoring, for example, national working groups meet regularly to strategize about building capacity without diminishing quality. While many are confident in their ability to scale effectively, service providers can help increase equitable implementation of the program by partnering with higher-poverty, less-resourced schools if they do not have capacity to fully meet demand.

Most service providers should look for SGOs with whom they can partner instead of assuming they must create their own. A high-quality service provider will likely better serve students by building capacity in what they do best, rather than figure out the bureaucracy of creating an SGO and the intense marketing campaign that would go into fundraising.

SERVICE PROVIDERS should:

- Prioritize serving underprivileged students if capacity is stretched.
- Invest efforts in building capacity rather than creating an SGO, in most cases.

Big payroll companies are aware of the tax credit and are creating systems so employers can easily allow employees to opt in to donate through payroll deductions and adjusted withholdings .

Employers should offer their employees the opportunity to easily donate through payroll deductions. Making donations automatic instead of leaving it to the individual will make a tremendous difference in generating scholarship resources.

Perhaps even more importantly than offering the deduction is choosing which SGOs to present to employees as options. In underfunded areas, coordinating with the local public schools to prioritize an SGO that invests in local scholarships makes sense. In areas that are better off, supporting local schools may still be an important priority for the community, but including a statewide option targeted toward lower-income public school students will help create more equity in the program.

Finally, some businesses may have a specific interest in growing a career pipeline and can investigate whether an aligned SGO exists to support such a venture. For example, a manufacturing plant might support student scholarships for equipment fees in a Career and Technical Education (CTE) program in a manufacturing pathway, a hospital might support credentialing programs for high school students to become CNAs, or a technology company might support student scholarships for coding enrichment classes.

EMPLOYERS should:

- Ask their payroll company about options for easily accomplishing automatic payroll deductions.
- Create an automatic payroll deduction option for employees to donate to an SGO.
- Include an SGO option that supports public school students from lower-income households.

While school-, district-, and state-led efforts will be critical to grow programs at scale, parents can also research available scholarships and apply for their children. While taxpayers are limited to $1,700 in donations for the tax credit, there is no limit on the value of scholarships a student receives. If a student is struggling with reading, a savvy and well-informed parent can inquire with their child's school whether a scholarship might be available for tutoring. A child who wants to participate in an expensive after-school activity might be able to afford it with the support of a scholarship. Parents of a student who moves to a neighboring district and wants to keep attending their former school might research SGOs to see if there is a scholarship available to cover out-of-district public school tuition.

Even if the scholarships are coordinated in partnership between a school and SGO, some parents will still need to submit income verifications. Advocates have asked for federal regulations to include streamlined ways to collect this information, like parents signing a simple attestation document that their income is below the upper threshold. Ways of verification may need to be more invasive than that for students who are not eligible for Medicaid, but whose families earn less than 90% of AMI, such as verifying tax returns. Parents should understand the rationale for those requests.

We anticipate that public school families who are less aware of the program are less likely than others to comply with regulations to apply for scholarships, which may leave their students unable to access valuable supplemental services. A small campaign to test messages for family compliance could be helpful to gain insights about who is most likely to participate, what messenger is most credible, and what benefits families most want.

FAMILIES should:

- Support schools to fill out requisite paperwork for income verification.
- Explore scholarship opportunities to fill unmet needs or extracurricular opportunities if a financial hardship prevents students from accessing these services.
- Encourage their children's schools to operationalize a partnership with an SGO to support its goals.

About half of Illinoisans owe at least $1,700 in federal income taxes and will have the opportunity to redirect that $1,700 from the federal IRS to a qualified SGO. Most will not know the program exists. But for those who do, being mindful about the SGO to which they donate matters. They will have the option of SGOs that support private school scholarships or public, local scholarships or state- and nation-wide, scholarships to cover across-the-board fees or scholarships targeted to specific student populations. If Illinois chooses not to participate, taxpayers will have the option to donate an SGO in another state or to forego donating altogether and keep their tax dollars flowing federally.

An informed taxpayer can amplify the reach of their local public school or schools across Illinois by asking their employer to create an automatic payroll deduction for employees, testifying at a school board meeting to put this on their school's radar, or simply notifying friends and family of the opportunity to donate.

TAXPAYERS should:

- Be informed about where and whether they donate their $1,700.
- Share the opportunity with their school board, employer, friends, and family.

Conclusion

Illinois should opt in to the Federal Tax Credit Scholarship Program, but that is just the first step of many to support equitable implementation and widespread access. This has the potential to be a fourth major funding stream for schools, right after property taxes, state resources, and federal funding - but only if school and state leaders are intentional about the program's design and implementation. There is one surefire way to ensure the program does nothing for public school kids, and that is to opt out altogether. But even with opting in, the potential will only be realized if numerous change agents are rowing in the same direction, working collaboratively to make the most of the program for Illinois' public school kids.

Thank you

We want to thank our working group members for all the time, passion, and feedback they have contributed throughout this process. They have jumped in with both feet and committed their summer to working through the details so we can fight to get this right for students in Illinois. We are grateful. We also appreciate the many other Illinois and national experts who provided feedback and answered many late-night questions as we developed this report.

About Stand for Children

Stand for Children is a unique catalyst for educational success and social progress, to create a brighter future for us all. Illinois is one of seven state affiliates and three national programs: the Center for Early Literacy and Learning Success, the Center for High School Success, and Teach Kindness. Contact Executive Director Jessica Handy (jhandy@stand.org) with any questions or feedback on this report.