

Supporting Statement for Paperwork Reduction Act Submission
ESEA Combined State Information Collection
Consolidated State Performance Report, Part I and Part II
August 16, 2007

1. This submission requests approval of the revised (Part I and Part II) Consolidated State Performance Report (CSPR), currently approved as OMB #1810-0614. CSPR is the required annual reporting tool for of each State, District of Columbia, and Puerto Rico as authorized under Section 9303 of the Elementary and Secondary Education Act (ESEA), as amended by the No Child Left Behind Act of 2001 (NCLB).

Section 9303 authorizes the Secretary to establish procedures and criteria for States to submit a consolidated annual State report in order to simplify reporting requirements and reduce reporting burdens, and further stipulates that the report shall:

- Contain information about the programs included in the report, including the performance of the State under those programs, and other matters as the Secretary determines are necessary, such as monitoring activities.
- Replace separate individual annual reports for the programs included in the consolidated State annual report.

The current approved CSPR will expire on January 31, 2008. Revisions to the CSPR are necessary at this time to further align CSPR data definitions and data elements with the approved *EDFacts* SY 2006-2007 and the SY 2007-08 *EDFacts* data elements (pending approval), to facilitate improved data quality, and to meet new NCLB data collection requirements not contained in the current CSPR. We are requesting a three-year approval of the revised collection to help stabilize data requirements for SEA and LEA respondents.

The changes reflected in the revised:

- Align CSPR data definitions and data elements with those contained in the *EDFacts* mandatory collection to facilitate greater pre-population of *EDFacts* data in CSPR.
- Further consolidate data collections across the Department to eliminate duplication and reduce burden by incorporating other the Department approved or required data collections with CSPR. These include:
 - Title III Biennial Collection (1885-0553)
 - Migrant Child Count Collection (1810-0519)
- Clarify instructions to ensure that the appropriate data are collected.
- Address NCLB reporting requirements related to Science standards and assessments and SES/Choice funding and improve data related AYP determinations.
- Simplify and standardize the format and wording throughout the collection for greater clarity and consistency.
- Refine data definitions to improve data quality

Part I of the CSPR collects only information that States are required to collect by statute, and information required for the Annual State Report to the Secretary, as described in section 1111(h)(4) of ESEA.

Part II of the CSPR collects information related to state activities and outcomes of specific ESEA programs needed for the programs' GPRA indicators or other assessment and reporting requirements. The Department needs these data in conjunction with data collected in Part I to monitor States' progress in implementing NCLB, and thus identify technical assistance needs and program management and policy needs.

The information requested in Part II meets the following criteria.

- The information is needed for Department program performance plans or for other program needs.
- The information is not available from another source, including program evaluations.
- The information will provide valid evidence of program outcomes or results.
- The Consolidated State Performance Report is the best vehicle for collection of the data.

Specific changes to the previously approved CSPR are contained in Attachment A: CSPR Item Descriptions and Attachment C: Crosswalk for Part I and Part II.

2. The Department uses the information derived from the CSPR to: (1) monitor and report its progress in meeting *Strategic Plan* goals; (2) assess and report individual program performance, including GPRA performance measures; (3) monitor States' implementation of NCLB and the extent to which States are meeting program and accountability goals; (4) to identify areas for technical assistance to States and overall program improvement; and (5) to inform other reporting and program evaluation requirements specific to individual programs and including the Secretary's *Annual State Report to Congress on No Child Left Behind*.
3. The CSPR data collection will be conducted electronically through the *EDFacts* online submission system (ESS).
4. Revisions to this year's Consolidated State Performance Report, result from considerable collaborative work between ESEA programs within OESE, OSDFS and OELA, and *EDFacts*. To the full extent practicable, the data requested in this report, including the revised data elements, are included in the approved 2006-2007 *EDFacts* collection and the proposed 2007-2008 *EDFacts*, will be collected through SEA data submissions to *EDFacts*, and will pre-populate data cells in the revised CSPR. During, the past two years, OESE has worked with *EDFacts* staff to align CSPR data definitions and elements with *EDFacts* to increase the number of data elements that can be collected through *EDFacts* and pre-populated in CSPR, and thus decreasing the annual reporting burden that CSPR imposes on States. Almost 60% of the data elements in the revised CSPR, inclusive of new data elements incorporated from other data collections (i.e., Title III Biennial Report and Migrant Child Count) are to be collected through State submissions to *EDFacts* and pre-populated in CSPR.
5. Neither small businesses nor small entities are affected by this collection.

6. If the information is not collected through these reporting instruments, the Department will not have the means to obtain sufficient data with which to monitor and report on States' progress in implementing their programs under NCLB.
7. No special circumstances exist that would cause the information collection to be conducted under any of the circumstance described in question # 7 of the required supporting statement.
8. Individual program offices and principal offices collaborate extensively with State officials and other program personnel on an ongoing basis through program directors' conferences and technical assistance meetings to establish GPRA indicators and to ensure that program activities are outcome based. Evidence that programs are meeting these indicators and attaining the specified outcomes is the basis for the reporting requirements incorporated in this information collection.

During the 60-day comment period, ED received comments from 11 individuals representing 8 State Departments of Education, one (1) association and one (1) non-profit entity. The combined comments totaled 41 individual concerns. Individuals from whom comments were received are listed below. Below is a summary table of the topics the comments addressed. A table summarizing the comments and responses to comments received is attached (Attachment D).

Topic	# Comments
Race and Ethnicity	1
Treatment of FTEs	1
ED Use of Data	1
Burden Hours	1
<i>EDFacts</i> /CSPR Alignment	2
Automated Edit Checks	1
<i>EDFacts</i> Prepopulation	2
Stabilize Reporting Requirements	1
1.6 – Title III	9
1.9 – McKinney Homeless	2
2.1 – Title I, A	2
2.3 – Migrant Education Programs	4
2.4 – Neglected & Delinquent Programs	11
2.5 – Comprehensive School Reform	1
2.7 – Safe and Drug Free Schools	2

In addition to the comments received from external sources during the 60-day comment period, program offices at ED sought and obtained feedback from the field. As a result of feedback from both sources, ED made editorial changes to some sections of CSPR, including sections 1.6, 1.4.9, 1.7, 1.9 and 2.3 to further refine definitions or otherwise clarify the data elements being requested.

9. No payment or gift of any kind will be provided to respondents.
10. As a matter of policy ED assures respondents that in reporting data to the public, no n-size will be used that can readily identify individuals. The n-size used to redact small numbers that could identify individuals is State specific. The number used for each State is the n-size that the State provided to ED in its accountability workbooks as the number below which ED should not make available to the general public, i.e., on www.ed.gov.
11. The information collection does not include questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.
12. The Department estimates that in for SY 2006-2007 the total burden hours for the revised CSPR Part I and Part II combined will be 28,583 hours. The increase in burden hours over CSPR 2005-06 results from the addition of the Migrant Child Count Collection, previously 1810-0519 and additional data requirements transferred from the approved Title III Biennial Collection, 1885-0553. These additions will result in an increase in burden hours of 1,560 hours for the Migrant Education data elements and 135 hours from the OELA data elements for a total of 28,583 burden hours.

CSPR Part I and II	SEA Burden hours	LEA Burden hours	Total
Approximate # of agencies	52	14,600	14,652
Average burden per agency	64.6 hours	1.72 hours	
Total for 1810-0614	3359.2 hours	25,224 hours	28,583

The average hourly rate for staff in each of the SEAs and LEAs to prepare the responses to this information collection is estimated to be \$24.00. Therefore, the total cost of the collection is estimated as \$685,997, which is equivalent to 28,583 X \$24.00.

13. This information collection does not require the use of any capital equipment, start-up costs or record keeping not included in the response to question # 12.
14. The annual cost to the Federal government for data collection, analysis, and dissemination is estimated at \$367,500: \$40,000 for program staff time and an additional \$327,500 incurred in FY 2007 for development and training related to the alignment of CSPR with *EDFacts* and related modifications to the online submission tool. The Department is requesting a three-year approval of CSPR and therefore anticipates that development costs will be minimal, limited to possible online enhancements. The Department expects also that in future years, with the CSPR more fully incorporated into *EDFacts*, development costs for revisions of the CSPR also will be reduced.
15. The Department estimates that in for SY 2006-2007 the total burden hours for the revised CSPR Part I and Part II combined will be 28,583 hours, and increase of 1,695 burden hours

over the SY 2005-06 C SPR. This increase results from the transfer to C SPR data elements and associated burden hours of Migrant Child Counts Collection (previously OMB control #1810-0519) and the Title III Biennial Collection, 1885-0553, (135 burden hours). While ED anticipates that pre-population from *EDFacts* ultimately will reduce the C SPR burden, SEAs have two years to fully meet the *EDFacts* reporting requirements. The number of SEAs able to take full advantage of pre-population through their *EDFacts* submissions for SY 2006-07 will not likely result in an appreciable reduction in burden for the revised C SPR. The Department expects that as *EDFacts* is fully implemented, the burden hours for C SPR will decrease commensurate with the increase in SEA *EDFacts* data submissions.

16. SEAs will be asked to submit their Part I of the Consolidated Performance Report to the Department on or before December 21, 2007. Part II will be due February 2, 2008. The report covers the 2006-2007 school year. States are collecting or have already collected the data required by this C SPR and the data are necessary to meet the Department's program management and reporting requirements.

After State submissions are received, ED program staff will conduct a data quality review. Data reports for each question will be obtained as data extracts from *EDFacts*.

17. Approval to not display expiration date has not been requested.

18. No exceptions were identified.