

**SUPPORTING STATEMENT FOR REQUEST FOR OMB APPROVAL UNDER  
THE PAPERWORK REDUCTION ACT**

A. JUSTIFICATION

1. Circumstances necessitating information collection.

In the Individuals with Disabilities Education Act of 2004 (IDEA), Congress stated that “the education of children with disabilities can be made more effective by... supporting high-quality, intensive preservice preparation and professional development for all personnel who work with children with disabilities in order to ensure that such personnel have the skills and knowledge necessary to improve the academic achievement and functional performance of children with disabilities” (Section 601(a)(5) (E)). The Office of Special Education Program's (OSEP) Personnel Development to Improve Services and Results for Children with Disabilities (CFDA No. 84.325) funds the largest personnel preparation grant program in the Department of Education. In order to ensure that OSEP is meeting the needs of children with disabilities and their families, OSEP needs to collect data on the results of funding institutions of higher education. This includes the number and characteristics (e.g. minority status, related professional experience) of professionals trained and the program outcomes (e.g. program completion, certification, employment in area supported by training). These data are being collected to assess program effectiveness and efficiency, and to meet the reporting requirements of the Government Performance and Results Act (GPRA) and the Program Assessment Rating Tool (PART). The data will provide information on the supply of the OSEP-funded projects nationally, within each state, and within and across personnel categories, including special educators certified to teach various specific disability categories, speech-language pathologists, preschool service providers, and paraprofessionals.

Analysis of these data will be used in the following ways: a) to inform the activities and priorities specific to personnel preparation conducted by the U.S. Department of Education; b) to determine variation in personnel preparation and factors related to that variation; and c) to evaluate the outcomes of the IDEA and OSEP's performance measures under GPRA and PART.

OSEP is revising this data collection instrument for a number of reasons. First, we added six items to the data collection instrument to collect data required for reporting under GPRA and the PART. These additional items

will only be completed for students that have completed the training program. Items related to the student's performance on the Praxis II Special Education exam or other performance measure were added to address PART Measure 1.2 of 2– the percentage of scholars completing Special Education Personnel Development funded preparation programs who are knowledgeable and skilled in evidence-based practices for infants, toddlers, children, and youth with disabilities.

The last item in Section F was added to ensure accountability that all teachers trained were highly qualified for the position in which they worked (or qualified for paraprofessionals, or fully certified for related services personnel). This item will be used in reporting on PART Measure 2.4 of 5 – the percentage of Special Education Personnel Development funded degree/certification recipients who are working in the area(s) for which they were trained upon program completion and who are fully qualified under IDEA .

Secondly, grantees, as well as OSEP, have requested a change to more accurately account for all students that benefit from the grant. We will now collect data on all students participating in the grant supported training, not just those students that receive direct funding. However, this change may increase the number of students that grantees will enter data on. To address this change, all text limiting responses to those students “receiving grant support” have been removed.

Thirdly, we have revised the race and ethnicity items to reflect current OMB policy, and included a minor language replacement from “personnel preparation” to “personnel development” to reflect a change in the program name in IDEA, Section 662. Also, instructions for some items have been enhanced. These revisions render the form more user-friendly, diminish response ambiguity, and create no additional burden for grantees.

In summary, because OSEP is requesting this additional information, OSEP will be able to more accurately plan for program improvements and priorities, and to more accurately and efficiently respond to reporting requirements for GPRA and PART.

### **Authorization for Collection**

This data collection is authorized by the following Public Law:

- (1) Public Law 108-446, Section 664 (a)(2)(A)(20 U.S.C. 1464) states that, "The Secretary shall, directly or through grants, or cooperative agreements, assess the progress in the implementation of this Act, including the effectiveness

of State and local efforts to provide a free appropriate public education to children with disabilities;" and

(2) Public Law 108-446, Section 662(a) (20 U.S.C. 1462) "The Secretary shall, on a competitive basis, make grants to, or enter into contracts or cooperative agreements with, eligible entities...to help address the needs identified in the State plan...for highly qualified personnel...to work with infants or toddlers with disabilities, or children with disabilities."

Further, Education Department General Administrative Regulations (EDGAR) require that grantees cooperate in any evaluation of the program by the Secretary (EDGAR, Sec 75.591) (20 U.S.C. 1221e-3 and 3474).

Ensuring an adequate supply of personnel to serve students with disabilities is critical to meeting the letter and the intent of the IDEA. During the 2004 IDEA reauthorization hearings, Congress heard testimony from numerous stakeholders emphasizing the critical need for highly qualified service providers. In amending IDEA in 2004, Congress reasserted its support for intensive professional development that will give personnel the knowledge and skills they need to help students meet challenging educational goals and lead productive, independent adult lives (Section 601(c) (5)(E)).

This Performance Report is to be completed annually by all grantees and contractors supported under Personnel Development to Improve Services and Results for Children with Disabilities, CFDA No. 84.325. The Performance Report is divided into two parts. Part I, Project Identification, consists of standard identification information on the grantee. Part 2, Pre-service Personnel Data, collects information on students receiving *pre-service* training and is divided into six sections.

Section A collects information on student demographics and other characteristics. Section B collects information on the student's training and employment prior to enrollment in the current OSEP grant. Sections A and B are to be completed when the student enters the program and will not change throughout the student's enrollment history.

Section C collects information about the characteristics of the student's current OSEP-supported training. Section D collects information about the student's outside employment during training. Sections C and D must be updated annually.

Section E collects student's training status information at the time of the student's graduation, dropping-out of the program, or the end of the grant project. Section F collects student's employment information at the time of the student's graduation, dropping-out of the program, or the end of the grant project. Sections E and F are to be completed just once for each student when the student exits the program (either through graduation or non-completion), or when the project ends. These data will assist OSEP in assessing program effectiveness.

2. Use for which the information is gathered.

This information will be used by OSEP to provide information on the characteristics of teachers and other personnel supported in these training programs and the outcomes of the programs (program completion, certification, employment in the area supported by training, etc.). Collection of these data is critical in assessing accountability for the grant program.

These data, submitted annually, also serve as the primary source of information for OSEP to assess program progress under GPRA for grants funded under Personnel Development to Improve Services and Results for Children with Disabilities, CFDA No. 84.325. In addition, this data collection also provides data required for annual reporting under the PART.

3. Use of improved information technology.

OSEP will collect the data in a web-based data collection. Grantees will be given a username and password and will enter data on students supported under their grants on the OSEP PPD website. The system is designed to direct grantees to the appropriate questions and reduces the likelihood that grantees will answer unnecessary survey items.

4. Efforts to identify duplication.

Information in the performance report does not represent any duplication of paperwork, content, reporting, or performance requirement. This data collection represents the only source of national information on the characteristics of personnel trained to serve children with disabilities under these programs and the outcomes of these programs.

5. Small businesses.

The information requested does not involve the collection of information from entities classified as small organizations.

6. Consequence of less frequent collection.

These data are needed annually so that OSEP can meet its annual requirements under GPRA and PART.

7. Special circumstances.

There are no special circumstances associated with the collection of these data.

8. Federal Register notice/consultation outside agency.

We will publish the appropriate 60- and 30-day Federal Register notices to allow for public comment.

OSEP annually supports a meeting of grantees who receive funds under Personnel Development to Improve Services and Results for Children with Disabilities, CFDA No. 84.325, at which data collection issues are discussed. Comments from grantees were used to clarify questions and response options on the survey instrument.

9. Payment of gifts to respondents.

No payments or gifts are provided to respondents for completing this information request.

10. Assurance of Confidentiality.

Each grantee is required to refrain from listing student names and Social Security Numbers on the forms. Student Identification numbers should be assigned to each student and maintained by the grantee. OSEP will not analyze individual student level data.

11. Questions of a sensitive nature.

There are no questions of a sensitive nature included in this data collection. Race/ethnicity data are collected in this performance report. The IDEA 2004 emphasizes that the training of professionals in the area of special education by minority individuals is essential if the nation is to obtain greater success in the education of minority children with disabilities (Section 601(10)(D)). Collecting these data will assist in analyzing and increasing the number of minorities trained in special education.

12. Estimate of respondent burden.

The mean time for filling out the revised form will now be 26 minutes for each student (two minutes more than former form). OSEP serves approximately 8,000 students in approximately 450 personnel preparation grants, which result in an average of 18 students per program. Assuming the mean number of students per program (18) and the mean burden (26 minutes), the average burden will be 468 minutes or 7.8 hours per project for a total of 3,510 annual hours. (The former burden was estimated at 10 students per program and at 24 minutes to complete the data collection per student.)

Burden is determined by examining two factors. First, adjustments are defined as burden due to additional students per grantee. Secondly, program changes are defined as burden due to addition of items on the data collection instrument based on program need. To determine burden due to each of these factors, a number of variables are used. The methodology for determining each burden factor is described.

**Adjustments.** Assuming the mean additional students per grantee (8) and mean minutes (26) to complete the revised form for an estimated 450 grantees will result in 1560 hours burden due to adjustments ( $[8 \times 26m \times 450/60m = 1560h]$ ).

**Program changes.** Given the former data collection based on approximately 10 students per grantee and 2 additional minutes added to data collection time per student, 20 additional minutes per grantee were added. With approximately 450 grantees, 150 hours more burden are due to program change. ( $[10 \times 2m \times 450]/60m = 150h$ ).

Estimate of cost to respondent. Respondent costs per grantee site are estimated at \$15 per hour, and the total number of burden hours for the survey is estimated at 3,510. The estimated cost per respondent is \$117, and the total estimated cost to all 450 respondents is \$52,650.

13. Respondent startup costs.

There are no startup costs.

14. Estimate of costs to the Federal Government.

The following table represents the estimated costs to the Federal Government associated with this data collection.

Xerox	100
Mailing	264
Staff	2,700
Contractor Data Services	52,456
Total	\$55,520

15. Reasons for program changes or adjustments

OSEP made both program changes and adjustments. Adjustments to the annual reporting and record keeping hour burden were necessary as grantees are funding more students than previously estimated. On average, grantees are currently funding 18 students each year. Previous estimates were based on an average of 10 students per grant. In addition, OSEP will now collect data on all students participating in the grant supported training, not just those students that receive direct funding. This change may increase the number of students grantees will enter data on. Grantees, as well as OSEP, have requested this change to more accurately account for all students that benefit from the grant.

In addition, program changes resulted in an increase in the amount of time per student. OSEP added six items to the data collection instrument to collect data required for reporting under the GPRA and the PART. However, these additional items will only be completed for students that complete the preparation program, not all students annually. This collection would be on about one-third of the program's students each year, those who complete the program, based on a three-year program.

16. Plans for tabulation and publication

A final report will be produced for each fiscal year. This report will include descriptive analyses of all variables collected. The number of students and percentages, as well as measures of central tendency when appropriate, will be presented by grant type in table format. Bulleted text and an executive summary will be provided to highlight key findings. The final report will also include analyses of relationships among variables in the current fiscal year data set as well as comparative analyses of key variables across all data sets.

In addition, analyses will be conducted to generate the statistics required for reporting under the GPRA and PART. OSEP will also present findings at its annual Project Director’s Meeting. The table below summarizes the data collection and reporting timeline. Each data collection period runs from September through August.

Task	Month(s)
Prepare system for data collection	September-October
Notify grantees when data collection begins	October
Grantees enter data	November-March
Data cleaning	March-April
Draft reports	June-July
Presentation at Project Director’s Meeting	July
GPRA and PART reporting	July-August
Final report	August

17. Display of OMB expiration date.

This item is not applicable as the OMB expiration date will be displayed on the form.

18. Exceptions to the certification statement.

There are no exceptions to the certification statement.