REQUEST FOR CLEARANCE OF PROPOSED STUDY

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

Survey on Use of Funds Under Title II, Part A

A. JUSTIFICATION

1. Importance of the Information

The No Child Left Behind Act of 2001 (NCLB), which reauthorized the Elementary and Secondary Education Act of 1965, places a major emphasis on teacher quality as a significant factor in improving student achievement. Under NCLB, Title II, Part A provides funds to states and districts to conduct a variety of teacher-related reform activities.[1] Unlike previous authorizations of Title II, which provided funds primarily for professional development in mathematics and science, under NCLB funds can be used for a variety of teacher quality activities in any subject area. For school districts, which receive the majority of these funds, allowable uses of funds include:

- Recruiting highly qualified teachers.
- Providing financial incentives for teachers in high-need areas.
- Offering professional development in core academic areas.
- Retaining teachers through mentoring, induction and other support services.
- Reforming tenure.
- Providing merit pay to teachers.
- Testing teachers in academic areas.
- Carrying out programs that emphasize multiple career paths for teachers.
- Reducing class size.

To gain a better understanding of how school districts were responding to the high level of Title II, Part A funding and the wide range of teacher quality reforms allowed under it during the first year of NCLB, the U.S. Department of Education collected baseline data in 2002-03 from districts around the nation to answer the question: "How did districts report spending their federal Teacher Quality funds in 2002-03?"

In addition to providing information on how LEAs use Title II, Part A funds, the U.S. Department of Education has used this survey to collect information on the provision of high-quality professional development in LEAs. These data on professional development satisfy Section 1119 (a)(2)(B) of NCLB, which requires that States make annual increases in this percentage. Initially the Department collected these data through the Consolidated State Performance Report (CSPR) but poor data quality in this collection lead the Department to collect the data directly from LEAs rather than from the State.

Results from previous year surveys can be found at http://www.ed.gov/programs/teacherqual/resources.html.

This OMB clearance request is to continue these analyses using a similar data collection instrument and sampling plan for the 2008-2009 school year and subsequent years. The major change from past years is the addition of a short survey for State Educational Agencies (SEA). The SEA survey will provide information on fiscal year allocations of Title II, Part A funds made to the LEAs selected for participation in the main survey. The SEA survey will be preprinted with the names of the LEAs selected for participation in the main survey. Data obtained from the States will be used to pre-populate LEA survey—we anticipate that this will prevent errors in finance reporting that have occurred in past years.

Please see Appendix D for a more detailed account of proposed changes to the survey instrument.

[1] The Title II, Part A program replaced two existing programs within the Office of Elementary and Secondary Education: the Eisenhower Professional Development and the Class-Size Reduction programs. Eisenhower program activities focused mostly on professional development in mathematics and science. The Class-Size Reduction program was primarily designed to reduce the class size of students in grades K through 3.

2. Purposes and Uses of the Data

The information will be collected annually from a nationally representative sample of 800 school districts, plus approximately 50 short SEA surveys. The information obtained will be used to evaluate and describe the implementation of the Title II, Part A program and the provision of high-quality professional development to teachers. The results of this study will be compared with similar results obtained under previous OMB clearances for school years 2002-03 through 2007-08 and reported to Congress and to the public. See Appendices A and B for a copy of the proposed data collection instruments for the 2008-09 survey.

3. Improved Information Technology

Respondents will be asked to complete and submit pre-printed data collection forms either by mail or by fax. In order to minimize reporting burden, the data collection forms that are provided to the sampled LEAs will be printed with all available district-level information from NCES' Common Core of Data (CCD) and with financial data obtained from the SEA surveys. The use of pre-printed forms reduces burden on the respondents and enhances data accuracy as the forms are submitted. Due to the small size of this study it is not cost-effective to develop a web-based data collection system.

4. Efforts to Identify Duplication

The information requested in the Survey on the Use of Funds Under Title II, Part A is not currently collected and is not available in other forms. This data collection effort is part of a planned, ongoing data collection to describe the nature of the Title II, Part A program as it is implemented at the LEA level and to provide information on the provision of professional development to teachers. By doing this survey using a nationally representative sample of 800 school districts, the Department has been able to eliminate several similar questions from the consolidated reporting form.

5. Methods Used to Minimize Burden on Small Entities

Small entities are not affected by this program. All respondents for this data collection are school districts.

6. Consequences of Not Collecting the Information

The information obtained as a result of the previous Title II, Part A data collections has been used extensively to evaluate the implementation of the Title II, Part A program. It has been particularly instructive to examine the program as it evolved from its predecessor, the Class Size Reduction program, which had very specific goals compared with the more general Title II, Part A program. It is critical that this data collection be continued on an annual basis to monitor program implementation. Specifically, the information collected for this program will be used both to inform the Department's performance indicators for GPRA and to inform the annual budget deliberations in the Congress. Not collecting this Title II, Part A data on an annual basis would remove from policymakers the only data currently available regarding this program.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

Requiring respondents to report information to the agency more often than quarterly:
Not applicable: this is an annual collection.

Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it:
Respondents will have more than 30 days after receipt to prepare a response.

Requiring respondents to submit more than an original and two copies of any document:
Respondents will submit only an original.

Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years:
Respondents will not be required to retain records specifically related to this data collection.

In connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study:
This is not applicable to this collection of information.

Requiring the use of a statistical data classification that has not been reviewed and approved by OMB:
This information collection does not require use of a statistical data classification that has not been reviewed and approved by OMB.

That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use:
This collection does not include such a pledge of confidentiality.

Requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate it has instituted procedures to protect the information's confidentiality to the extent permitted by law.
This collection does not require respondents to submit proprietary trade secrets.

8. Consultations Outside the Agency

For the previous Title II, Part A study, the Department consulted with several state education agencies and school districts to determine the feasibility of the data collection. Additionally, we conducted a pilot test of the revised 2004-05 data collection instrument with five school districts. In selecting the school districts to participate in the pilot test, we sought to include school districts of varying size and location. The purpose of the test was to (1) verify that school districts will be able to provide information for all of the data items on the data collection instrument and (2) ensure that the burden estimates used in this clearance package are accurate. As a result of this effort, we made several revisions to the wording on the data collection instrument and determined that we had somewhat underestimated the respondent burden. This OMB clearance request has been modified to accommodate the changes made to the LEA survey and the addition of the SEA survey for the 2008-09 data collection.

Additional clarification provided for certain questions on the LEA survey is a result of the technical assistance that Westat, the contractor that will process the survey, has provided to districts completing this survey in the past. Through discussions with many of the districts completing this survey in previous years, Westat was able to determine which questions districts frequently needed additional information on in order to complete the survey.

We have sought public comment using the required 60- and 30-day Federal Register Notices.

9. Payments or Gifts to Respondents

No payment or gifts to respondents have been made.

10. Assurance of Confidentiality

There is no assurance of confidentiality.

11. Sensitive Questions

There are no questions of a sensitive nature.

12. Estimated Response Burden

Annually, a sample of 800 LEAs will be asked to complete the data collection instrument. We estimate that the LEA survey will take an average of 6 hours to complete. The cost to respondents is estimated to be $25 per hour for a total cost to respondents of approximately $120,000 for the 2008-09 data collection. Westat, the contractor that will process the survey, has estimated this hourly rate, based on previous experience with similar data collections. The estimated completion time for the 2008-09 data collection instrument is based on experience with the 2002-03 Title II, Part A data collection and on subsequent years of the same collection.

Through our pilot test, we determined that the amount of time needed to complete the form varied substantially from one district to the next. For some districts, the time needed to complete the forms would be minimal, whereas others will need to devote significant resources to compiling the requested information. The proposed burden estimate of 6 hours per respondent represents what we believe will be the average burden across all districts in the sample.

We estimate that the burden for the SEA survey will be 4 hours per respondent, for a total of 200 hours. The cost to respondents is estimated to be $25 per hour for a total cost to respondents of approximately $5,000 for the 2008-09 data collection. Westat, the contractor that will process the survey, has estimated these figures, based on previous experience with similar data collections.

13. Estimates of Cost Burden for Collecting Information

There are no costs that (a) meet the criteria for inclusion under this item and (b) have not been addressed in either item #12 or #14.

14. Estimated Annualized Cost to the Federal Government

The annualized cost to the federal government is estimated to be $100,000. The $100,000 represents the budgeted cost for our contractor, Westat to conduct this study.
The cost break-down across the major tasks for the SEA and LEA surveys are as follows.
Survey development/preparation and sampling -- $20,000
Data collection and entry -- $40,000
Data analysis and reporting -- $40,000

Westat does not foresee that the addition of the SEA survey will change the net cost of conducting this study. Westat already has the data systems in place to collect and analyze these data, and the SEA survey represents a small proportion of the total number of respondents.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

The total annual hours increased by 1,000 hours to accommodate the additional time needed for LEAs to complete one additional question on the LEA survey and for SEAs to complete the SEA survey.

16. Tabulation and Analysis Plan and Schedule

We anticipate that the results of this study will be published in an issue brief similar to the 2006-07 results currently available on the ED website (http://www.ed.gov/programs/teacherqual/findings2007.doc). In addition, the data obtained through this data collection will be incorporated into congressional briefings, as well as the Department’s GPRA indicators.

17. Display Expiration Date for OMB Approval

No request is being made to not display the expiration date for OMB approval of the information collection.

18. Exceptions to Certification Statement

There are no exceptions to the referenced certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

1. Respondent Universe

We will draw a sample of 800 school districts for this study from the 2008-2009 NCES CCD Public Elementary and Secondary Agency Universe File. Specifically, we will draw the sample from the over 16,500 agencies overall in this data file, of which almost 15,000 (or 90%) are classified as regular school districts.

2. Sample Design

A stratified sample of 800 school districts will be selected for the survey. To select the sample, we propose to stratify the school districts in the frame by school district size and poverty status. The most recent district-level poverty estimates will be used to stratify the school districts by level of school district poverty.

3. Methods for Maximizing the Response Rate

A letter (Appendix C) will be sent to each school district along with the survey, reiterating the reasons for selection and requesting cooperation. Districts will be given the option of responding by mail or by fax, whichever they find easiest. If the returned survey is not received by the expected date, a reminder card will be sent to the school district. Following the reminder card, contractor personnel will re-send the data collection instrument to non-respondents and continue to attempt to obtain completed surveys for 2 months after the initial mail out of the data collection instruments. The contractor for this study has a long history of achieving high response rates through repeated mail and telephone follow-ups. This study is striving for a response rate of 80 percent. The contractor will examine non-respondents to determine any response bias.

4. Tests of Procedures and Methods

The proposed data collection instrument was pilot tested with five school districts. Although the 2002-03 Title II, Part A study used a form that is very similar to the one proposed for this data collection, we conducted the pilot test to ensure that the information requested on the form is readily available from the school districts and that the burden estimates are accurate. The results of this pilot test caused us to revise our burden estimates and make several minor modifications to the data collection instrument that have been incorporated into this clearance package.

5. Consultations on Statistical Aspects of the Design

All sample design development will be provided by Dr. Adam Chu of Westat's Statistical Support Group.