

Office of Innovation and Improvement Response to OMB 12/22 follow-up on terms of clearance:

We have coordinated the data collection with EDEN by using EDEN demographic and school performance data in our analysis, instead of asking grantees to provide this data to us. By using the CSP Data Collection Form, WestEd collected subgrant award information from CSP grantees and later merged these data with demographic and performance data provided by EDFacts. The merge was done by matching schools using the NCES ID number. Thus, the CSP grantees only had to report on the CSP subgrant award information - information that was not available anywhere else - and WestEd could gather the additional data from EDFacts in order to calculate the proficiency rates that were specified in the program's GPRA measures.

The reason the burden is increasing is because the number of grantees has changed and, more importantly, WestEd also has more reliable data on the number of subgrants that each SEA must provide data for. Prior to data collection, WestEd consulted with program staff in order to determine the approximate number of active subgrants in each state in order to further customize each SEA's CSP Data Collection Form and plan subsequent technical assistance. As a result, WestEd estimated the total reporting burden to be one hour per SEA. After three rounds of data collection, WestEd can better estimate the number of subgrants per SEA and therefore updated the burden table to provide the "Total Minutes per Subgrant" instead of the "Total Hours per Grant" that was included in the original Supporting Statement. As a result of this new information, the burden is expected to increase from 81 hours to 110 hours. However, it is important to note that this change is not a result of any change in the Data Collection Form or due to any introduction of new or additional data elements.

Under the prior terms of clearance, we planned to incorporate some of the items from the CSP Data Collection worksheet into the EDFacts data collection. However, the EDEN Submission System is still evolving and not able to include survey items for the CSP at this time. However, WestEd has been able to improve upon the data collected through EDFacts by identifying data errors in our merge of CSP award data and EDEN data and have provided this information to ED's PIMS staff for clarification and correction.