Supporting Statement for a Request for OMB Approval
Title II Accountability Reporting Forms and User Guidance authorized by the Higher Education Act of 1965, as amended in 2008 by the Higher Education Opportunity Act (HEA).
Office of Postsecondary Education (OPE), Strategic Planning Staff
June 23, 2009

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

This information collection is required to respond to a statutory mandate from Congress contained in Title II of the Higher Education Opportunity Act (HEA), P.L. 110-315, Sections 205-208. The Office of Postsecondary Education (OPE) will collect information for the U.S. Department of Education (Department). Title II of HEA requires state-approved traditional and alternative teacher preparation programs in institutions of higher education (IHE) that enroll students receiving federal assistance under the Act to report annually to the state and the general public in every state and outlying area. Each state receiving funds under the Act will report on the quality of teacher preparation in the state for traditional and alternative routes to state certification or licensure. All participants will be in full compliance with the OMB Race/Ethnicity data collection Guide requirements issued October 2007 and the Final Guidance on Maintaining, Collecting, and Reporting Racial and Ethnic Data to the U.S. Department of Education, by 2010. The target population for this data collection consists of two groups:

- State teacher certification and licensure authorities (annual state report); and
- Administrators of teacher preparation programs at IHEs (annual institutional report).

The law requires the Secretary of Education to submit an annual report on the quality of teacher preparation programs to the Congress. That report is based on annual state reports, which in turn are based on annual reports from IHEs and other entities that have teacher preparation programs. While the law does not specify due dates, we propose following the reporting schedule that was established under Title II of the HEA, as amended (P. L. 105-244, Section 207). The reports from IHEs to states will be due in April of each year. The reports from states to the Secretary of Education will be due in October of each year, and the report from the Secretary to Congress will be due in April of the following year. This statement supports clearance specifically for the questionnaire (report forms) and instructions (user manual) to be used in preparing the annual state and IHE reports. OMB approval is requested on a regular schedule.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The Department uses the information collected in the report forms submitted by state education agencies to prepare a Congressionally-mandated annual report on the nation's teacher quality that is made available on the internet at https://title2.ed.gov/default.asp. The information in the report informs the public and students about the quality of teacher preparation programs and requirements for state teacher certification and licensure. In addition, the report provides information on the performance of teacher preparation programs in institutions of higher education in every state. Congress and the Administration use the report as a policy-making resource concerning teacher preparation, state certification or licensure, and highly qualified teachers.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

- OPE places the interactive version of the state questionnaire on its web site at https://title2.ed.gov/srsomb. .

- To minimize the burden on institutions of higher education, states use testing companies or the states themselves calculate the teacher test pass rates required by HEA. Title II e-report forms' expedite electronic reporting by using radio buttons to save, exit, reset in various conditions, text boxes, check boxes, an edit list option for assistance with numerous data points reported in lists, real-time edit checks and spell-check.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use of the purposes described in Item 2 above.

This information does not duplicate any other information collection effort. No other agency collects national information on teacher preparation programs, teacher certification and licensure, teacher assessment and pass rates in the same manner. The information is not available in other forms or as the result of other information collections.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

Small businesses or other small entities are not part of the target population of the information collection.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

Title II of the HEA requires this annual data collection. The Secretary — and the states and institutions required to report — would be out of compliance with the statute if the information were not collected annually and reported in a timely manner.

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;**

- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

- **requiring respondents to submit more than an original and two copies of any document;**

- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

- **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;**

- **requiring the 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; or**

- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances that would require this information collection to be conducted in any of the ways listed as part of this question.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A 60 day and 30 day notice about this data collection will be published in the Federal Register to allow public comment. OPE staff has consulted extensively with groups and individuals to refine the information collection forms and ensure an expedited process. In December 2008, the Department convened a working group with representatives from state education agencies, an institution of higher education, testing companies, national organizations and the Department's contractor for this data collection, Westat. The group reviewed draft data collection instruments, discussed reporting definitions and procedures and provided the Department with feedback. After the meeting, a password-protected website was created to facilitate continued discussion and document sharing. All 59 state Title II coordinators were invited to participate in discussions and provide their feedback via the website. OPE also conducts several annual conference calls with states to discuss the questionnaire and data collection processes.

9. Explain any decision to provide any payment or gift to respondents other than remuneration of contractors or grantees.

No payment or gift will be provided to respondents in connection with this data collection.

10. Describe any assurance of confidentiality provided to respondents.

The information being requested through these surveys is required, not voluntary. Much of the required information is public information, since certification and licensure requirements are a matter of public record in all states and jurisdictions. The production and verification of pass rates, which involve personally identifiable data, will be in accordance with all applicable state and federal laws, including privacy laws. Other individually identifiable data will also be handled in accordance with all relevant laws, including privacy laws. In accordance with the Act, pass rates on tests taken by fewer than 10 examinees will not be reported.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The data collection includes no questions of a sensitive nature. The information items in the state and institutional reports are not of a sensitive nature, and respondents should feel comfortable answering any of the questions.

12. Provide estimates of the hour burden of the collection of information.

a.   Annual burden hours for state respondents: 911 hours
There are 59 state respondents. Of the 59 respondents, 17 compute their own pass rates and 42 use testing companies to compute their rates. It is estimated that a weighted average of 911 hours per state respondent will be needed to assemble, check, and report the required information in each of the three reporting years (See Table 1). The total hour burden for states is estimated to be 53,742.

b. Annual burden hours for IHE respondents: 145.8 hours
There are an estimated 1,250 teacher preparation programs at IHEs across the nation. It is estimated that an average of 145.8 hours per IHE respondent will be required to assemble, check, and report the required information to state authorities (See Table 2). IHEs may already maintain records from which the information requested can be collected, or they will be able to prepare the records from testing organization reports and their own existing database resources. The total hour burden for all IHEs is estimated to be 182,219.

The total annual cost burdens to respondents resulting from the information collection follow: See Tables 1 and 2 for specific calculations.
Total cost burden for annual state reports is estimated at $2,129,313.
Total cost burden for IHE reports is estimated at $8,256,719.
Total cost burden for all respondents on the public is estimated at $10,386,032.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

The total for the capital and start-up cost components for the information collection is 0. This collection will not require the purchase of any capital equipment and will not create any start-up costs.

14. Provide estimates of annualized cost to the Federal government.

The annualized cost to the Federal government will be approximately $500,000. This includes the equivalent of one person-year of senior federal government staff time and the cost of employing a contractor to make adjustments to the data collection instruments, tabulate and analyze the data, and prepare drafts of the Secretary's annual report on the quality of teacher preparation programs and state requirements for teacher certification or licensure. It also includes the cost of using a contractor to provide technical assistance to states and institutions for implementation of the reporting system. There are no other marginal costs to the Federal government for this data collection.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the IC Data Part 1.

Adjustments were made to 12, Total annual cost burden to reflect that the new HEA legislation greatly increased the amount of data required from IHEs and states. Not only are IHEs and states required to collect and report more data annually, states must compile the vast majority of the data reported by the IHEs and include them in the state report. Previously, under Title II of the Higher Education Act, most of the data reported by IHEs to the states were not included in the state reports.

The revised forms required an adjustment for total hours requested for states from 35,400 to 53,742. For IHEs, the adjustment was from 86,250 to 182,219 total hours requested.

16. For collections of information whose results will be published outline plans for tabulation and publication.

The Secretary of Education will submit an annual report to the Congress each year. That report will be based on annual state reports, which are due to the Secretary each year. Data from IHEs with teacher preparation programs are due to state authorities annually for use by states in preparing annual reports to the Secretary, who will, in turn, use these reports in preparing a report to Congress. OPE calculates national data and publishes the report on the web site at https://title2.ed.gov/default.asp.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

OPE will display the expiration date for OMB approval of the information collection on the first page of the annual state questionnaire, the annual IHE questionnaire and the user manual.

18. Explain each exception to the certification statement identified in Item 20, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to the statement, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-1.

B. Collections of information employing statistical methods

This information collection does not use statistical sampling methods.