

PURPOSE: INFORMATION

DATE:

TO: Office of Management and Budget Desk Officer

FROM: John Clement, Director, Strategic Planning Staff

SUBJECT: Request for Review and Clearance for Title II of the *Higher Education Opportunity Act (HEOA)* State and Institutional Report Forms and Instructions on Teacher Quality and Preparation

PURPOSE

The purpose of this memo is to request a regular three-year clearance from the Office of Management and Budget (OMB) for revised state and institutional report forms and instructions used to collect information required by Title II of the *Higher Education Opportunity Act* (Public Law 110-315, Sections 205-208). The data collection activities will begin in the fall of 2009 and be reported to the Department in October of 2010. The recent reauthorization of *HEOA* made a number of changes in the Title II report requirements for states and IHEs, and the reporting forms and instructions in the *User Manual* have been revised to ensure that the information collection will continue to be accurate and complete.

BACKGROUND

Since 2001, states and IHEs with teacher preparation programs have reported on teacher preparation and requirements for certification or licensure on forms under prior OMB approval (OMB Control No. 1840-0744). The Secretary has submitted required annual reports, based on the state reports, to Congress on teacher preparation program quality and output and states' requirements for initial teacher certification or licensure since 2002. States and IHEs must now report more information to the Department to meet *HEOA*'s reporting requirements.

CHANGES

The recent reauthorization made a number of significant changes in the Title II reports that States and IHEs must prepare. The changes are specifically discussed in the Supporting Statement, and the burden increase associated with them at the state and institution levels are provided in Tables 1 and 2. Among the more significant changes to the existing reporting system are the following:

- Teacher preparation program pass rates on states' required teacher assessments must now be reported for some enrolled students (those who have completed all non-clinical coursework), as well as program completers for two years – previous data collection requirements were only for program completers in the current year;

- Assessment reporting now includes scaled score averages as well as pass rates – previously only pass rates were required;
- Teacher preparation program data now must include counts of all enrolled students by race, ethnicity and gender – previously no counts were required;
- Alternative route teacher preparation programs must now report pass rates – previously only aggregate pass rate data were provided by the states; and
- Significantly more teacher preparation program data must be included in the state reports and in the Department’s report to Congress.

On the other hand, Congress has eliminated the prior requirements that:

- IHEs rank teacher preparation programs within a state by assessment pass rate, and
- States report percentages of teachers on waivers of full initial certification; with the No Child Left Behind requirement that all teachers of core academic subjects be highly qualified (and thus fully certified), this provision, too, lost its usefulness.

Another important difference between the current and previous legislation is that section 205(c) of the HEA now requires that “Secretary shall prescribe regulations to ensure the reliability, validity, integrity, and accuracy of the data submitted pursuant to this section.” Prior law contained no such provision, and the definitions and procedures ED established for State and IHE reporting simply needed standard Office of Management and Budget approval under the Paperwork Reduction Act. We are preparing a Notice of Proposed Rulemaking for Title II data collection and reporting. The proposed regulations are needed to implement recently enacted changes in section 205(c) of Title II in the *HEOA*, and validate and ensure the data quality of states’ reports that are entered into the Department’s electronic information collection system.

CONCLUSION

In summary, this request is for regular clearance for the Title II revised data collection forms and instructions in the *User Manual* to OMB. The burden for states and IHEs has been analyzed and adjusted for the increase over previous calculations in Tables 1 and 2. The supporting documents required by the information collection approval process have been submitted into the Education Information Collection System (Tracking Number 03991) for your review. Additional information and explanation are available upon request.