

Paperwork Reduction Act Submission Supporting Statement

ESEA Combined State Information Collection: Consolidated State Performance Report, Part I and Part IIⁱ

August 28, 2008

Introduction

The Consolidated State Performance Report (CSPR) is the required annual reporting tool for of each State, Bureau of Indian Education, District of Columbia, and Puerto Rico as authorized under Section 9303ⁱⁱ of the Elementary and Secondary Education Act (ESEA), as amended by the No Child Left Behind Act of 2001 (NCLB). The CSPR consists of two parts. Part I of the CSPR collects data related to the five NCLB goals established in the approved June 2002 Consolidated State Application, information required for the Annual State Report to the Secretary, as describe in section 1111(h)(4) of NCLB, and data required under Homeless Collection and the Migrant Child Count. Part II of the CSPR collects information related to state activities and outcomes of specific ESEA programs needed for the programs' GPRA indicators or other assessment and reporting requirement.

The current CSPR was approved (OMB #1810-0614) in October 2007 and will not expire until October 31, 2010. The Department is requesting SEAs to submit their Part I of CSPR for SY 2007-08 to the Department on or before December 19, 2008. Part II will be due on or before February 27, 2009.

This submission requests approval of new or substantially revised questions in Sections 1.2, 1.3, 1.4 and 1.6 of CSPR Part I, and section 2.2 of CSPR Part II. Proposed revisions are needed to (1) meet new data requirements, (2) more accurately reflect data requirements reflected in statute, and (3) align data requirements with other ED*Facts* and other data collections. The remaining questions in SY 2007-08 CSPR are the same with no substantive changes. The current CSPR is approved until October 31, 2010. ED expects that with the approval of this submission the CSPR will remain substantially the same through the CSPR SY 2009-2010 collection. Therefore, we are asking for a three-year approval of this submission.

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.** Section 9303 of ESEA authorizes the Secretary to establish procedures and criteria for states to submit a consolidated annual state report to:

- Contain information about the programs included in the report, including the performance of the state under those programs, and other matters as the

- Secretary determines are necessary, such as monitoring activities.
- Replace separate individual annual reports for the programs included in the consolidated state annual report.

The CSPP is the reporting tool established by ED to meet these requirements.

The changes requested in this submission are necessary at this time to: (1) meet new NCLB data collection requirements for School Improvement Grants (Section 1003(a)ⁱⁱⁱ and 1003(b)^{iv}) and science assessments (1111(b)(3))^v implemented in SY 07-08, and (2) more accurately reflect the data requirements in 1111(h)(4)(D) and section 3121(b)(1) for evaluation, (3) align Title I, Part B student performance measures with existing collections. Specific changes are detailed in Attachment C-1 and summarized below:

Sections 1.2 Participation in State Assessments

- Adds one (1) question on participation of all in science assessments (Section 1111(b)(3))^{vi} administered beginning with the 2007-08 school year.
- Adds one (1) question on participation of students with disabilities on science assessments (Section 1111(b)(3)) administered beginning with the 2007-08 school year.

Section 1.3 Student Academic Achievement

- Adds one (1) question on student performance on science assessments (Section 1111(b)(3)) administered beginning with the 2007-08 school year.

Section 1.4: School and District Accountability

- Adds 9 questions to meet new OMB-approved reporting requirements for School Improvement Grants (Section 1003(a)^{vii} and 1003(b)^{viii}) that began with SY 2007-08. These include:
 - Number and percentage of students who are proficient in reading/language arts and mathematics in schools that received technical assistance through the statewide system of support and whether that number and percentage increased from the prior year as measured by State assessments.
 - Number and percentage of students who are proficient in reading/language arts and mathematics in schools that received School Improvement Funds as a result of subgrants to LEAs and whether that number and percentage increased from the prior year as measured by State assessments.
 - The number of schools that received technical assistance through the statewide system of support that— make adequate yearly progress; exit improvement status.
 - The number of schools that received School Improvement Funds.
 - Evidence that SEAs, LEAs, and schools used data to make decisions about the use of School Improvement Funds
 - Evidence indicating those school improvement strategies that were effective in contributing to increased student achievement; adequate yearly progress; and exiting improvement status.

- The amount of funds allocated under section 1003(g) and 1003(a) to each LEA and school eligible to receive such funds.

Note: Technical Amendments for SY 08-09 ED*Facts* Data Set related to the new CSPR questions in Section 1.4.8: *School Improvement Status* are attached (Attachment E).

Section 1.6: Title III and Language Instructional Programs

- Substantially revises 6 questions required by section 1111(h)(4)(D) and section 3121(b)(1) to more accurately reflect the data requirements in 1111(h)(4)(D) and section 3121(b)(1) for evaluation.
- Adds one (1) question on native language versions of science assessments to meet science, reporting requirements effective for the SY 2007-08.
- Adds one (1) question on LEP performance on science assessments to meet science reporting requirements effective for the SY 2007-08

Section 2.2: W. F. Goodling Even Start Family Literacy Programs (Title I, Part B, Subpart 3)

- Adds one (1) new question to align student performance measures with existing collections.

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.

Part I of the CSPR collects only information that States are required to collect by statute or regulation, and information required for the Annual State Report to the Secretary, as described in section 1111(h)(4)^{ix} of ESEA.

Part II of the CSPR collects information related to state activities and outcomes of specific ESEA programs needed for the programs' GPRA indicators or other assessment and reporting requirements. The Department needs these data in conjunction with data collected in Part I to monitor States' progress in implementing NCLB, and thus identify technical assistance needs and program management and policy needs.

The information requested in Part II meets the following criteria.

- The information is needed for Department program performance plans or for other program needs.
- The information is not available from another source, including program evaluations.
- The information will provide valid evidence of program outcomes or results.
- The Consolidated State Performance Report is the best vehicle for collection of the data.

The Department uses the information derived from the CSPR to: (1) monitor and report its progress in meeting *Strategic Plan* goals; (2) assess and report individual program performance, including GPRA performance measures; (3) monitor States'

implementation of NCLB and the extent to which States are meeting program and accountability goals; (4) to identify areas for technical assistance to States and overall program improvement; and (5) to inform other reporting and program evaluation requirements specific to individual programs and including the Secretary's *Annual State Report to Congress on No Child Left Behind*.

Specific to this submission, which requests the addition of new items to meet statutory and regulatory reporting requirements cited above, Title I monitoring teams and other ED officials will use these data to ensure that SEAs, LEAs, and schools implement science assessment requirements and school improvement activities in accordance with ESEA statute and regulations.

- 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.**

The Department will collect CSPR data collection electronically through the online Eden Submission System (ESS), a component of *EDFacts*. The Department first implemented the online submission system in the 2004-05 school year and continues to adopt technical enhancements requested by SEAs, including access to previous year submissions, providing CSPR coordinators with reports on the completeness of their submission, and edit checks to ensure the accuracy of the data submitted on the CSPR. The online submission system also allows SEAs to utilize data submitted through *EDFacts* to respond to CSPR questions. SEAs have provided consistent positive feedback regarding the submission system as a more efficient way of collecting information and program offices in the Department have benefited from timely access to completed CSPR forms.

To the full extent practicable, the data requested in this report are also included in the 2007-2008 *EDFacts* collection. Therefore, SEAs will be able to use the data submitted through *EDFacts* to respond to questions on the CSPRs. For the past three years, the Office of Elementary and Secondary Education (OESE) has collaborated with the Office of Planning, Evaluation, and Policy Development (OPEPD) to align CSPR data definitions and elements with *EDFacts* to increase the number of data elements that can be collected through *EDFacts* and pre-populated in CSPR, and thus decreasing the annual reporting burden that CSPR imposes on States. (See Attachment D: *CSPR& EDFacts Crosswalk for SY2007-08*.)

- 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.**

Each year in preparation for the annual CSPR collection, ED staff conduct a

thorough, question by question, analysis of CSPR to ensure that each question provides the information that was intended, that the information obtained continues to be fully utilized, and that the questions as presented are clear yield high quality data. The analysis involves the relevant program directors and staff and the Office of the General Counsel (OGC), and incorporates feedback from the field. This year the analysis identified (5) CSPR questions that can be combined and (7) questions that should be eliminated because the program no longer utilizes the data or the statutory or regulatory basis for the collection was considered questionable by the OGC. A request for approval to eliminate these items was approved under and OMB83 C on 6/16/2008.

In addition, to the full extent practicable, the data requested in the CSPR SY 2007-08 are included in the proposed 2007-2008 *EDFacts*, will be collected through SEA data submissions to *EDFacts*, and will pre-populate data cells in the CSPR. Full use of *EDFacts* data to pre-populate CSPR will not occur until SY 2008-09, when required submissions through *EDFacts* will be fully implemented.

5. If the collection of information impacts small businesses or other small entities (Item 8b of IC Data Part 2), describe any methods used to minimize burden.

Neither small businesses nor small entities are affected by this 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.

If the information is not collected through these reporting instruments, the Department will not have the means to obtain sufficient data with which to monitor and report on States' progress in implementing their programs under NCLB.

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 that 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.**

No special circumstances exist that would cause the information collection to be conducted under any of the circumstance described above.

- 8. 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.**

Individual program offices and principal offices consult extensively with State officials, including SEA leadership, program directors and other designated program contacts, CSPR and ED*Facts* coordinators. Consultations occur through ongoing program monitoring and technical assistance activities, program directors conferences, data conferences, Webinars and teleconferences, which enable ED to ascertain the availability and quality for required data, to clarify data elements, definitions and report instructions and to provide other targeted assistance.

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

No payment or gift of any kind will be provided to respondents.

- 10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulations, or agency policy.**

As a matter of policy ED assures respondents that in reporting data to the public, no n-size will be used that can readily identify individuals. The n-size used to redact small numbers that could identify individuals is State specific. The number used for each State is the n-size that the State provided to ED in its accountability workbooks as the number below which ED should not make available to the general public. State accountability workbooks can be found on ED's Web site at www.ed.gov.

- 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. This justification should include the reason 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 information collection does not include questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The education data collected will only consist of information about states, school districts, and schools.

12. Provide estimates of the hour burden of the collection of information and the annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. .

The total annual reporting and recordkeeping burden for the collection is estimated to be 29,707.8. Most of the information for this collection is collected and compiled by the SEA. The SEA submits all of the information for the collection to the Department. The annual burden to each of 53 SEA respondents for this collection is estimated to be 84.6 hours. The combined burden to States for this information collection is estimated to be 4483.8 hours. Another 1.72 hours is estimated for each LEA to respond to requests from SEAs for information required by this collection.

CSPR Part I and II	SEA Burden hours	LEA Burden hours	Total
Approximate # of agencies	53	14,600	14,653
Average burden per agency	84.6 hours	1.72 hours	
Total for 1810-0614	4483.8 hours	25,224 hours	29,707.8

The average hourly rate for staff in each of the SEAs and LEAs to prepare the responses to this information full collection, including proposed amendments is estimated to be \$24.00. Therefore, the total cost of the collection is estimated as \$712,9872, which is equivalent to 29,707.8 X \$24.00.

13. Provide an estimate of the total annual cost burden to respondents or record keepers for capital expenses resulting from the collection of information.

This information collection does not require the use of any capital equipment, start-up costs or record keeping not included in the response to question # 12.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The annual cost to the Federal government for data collection, analysis, and dissemination is estimated at \$367,500: \$40,000 for program staff time and an additional \$327,500 incurred in FY 2008 for development and training related to the alignment of CSPR with *EDFacts* and related modifications to the online submission tool. The Department expects also that in future years, with the CSPR more fully

incorporated into *EDFacts*, development costs for revisions of the CSPR also will be reduced.

15. Explain the reasons for any program changes or adjustments reported in Items 16 of IC Data Part 1.

The Department estimates that the total burden hours for the revised CSPR Part I and Part II combined will be 29,707.8 hours, an increase of 1,124.8 burden hours over the SY 2006-07 CSPR.

ⁱ The Consolidated State Performance Report (CSPR) includes data from state education agencies that track progress in implementing the *No Child Left Behind Act (NCLB)*. CSPR data include information on adequate yearly progress, state performance assessments, highly qualified teachers, public school choice and supplemental education services options. Disaggregated demographic data are available for limited English proficient students, student with disabilities, and students in high- and low-poverty schools (A Pocket Guide to *EDFacts*, 2007).

ⁱⁱ SEC.9303. Consolidated Reporting – (a) In general: In order to simplify reporting requirements and reduce reporting burdens, the Secretary shall establish procedures and criteria under which a State educational agency, in consultation with the Governor of the State, may submit a consolidated State annual report. (b) Contents: The report shall contain information about the programs included in the report, including the performance of the State under those programs, and other matters as the Secretary determines are necessary, such as monitoring activities. (c) Replacement: The report shall replace separate individual annual reports for the programs included in the consolidated State annual report.

ⁱⁱⁱ SEC. 1003(a). School Improvement – (a) State Reservations: Each State shall reserve 2 percent of the amount the state receives under subpart 2 of part A for fiscal years 2002 and 2003, and 4 percent of the amount received under such subpart for fiscal years 2004 through 2007, to carry out subsection (b) and to carry out the State’s responsibilities under sections 1116 and 1117, including carrying out the State educational agency’s statewide system of technical assistance and support for local education agencies.

^{iv} SEC. 1003(b). School Improvement – Uses: Of the amount reserved under subsection (a) for any fiscal year, the State educational agency – (1) shall allocate not less than 95 percent of that amount directly to local educational agencies for schools identified for school improvement, corrective action, and restructuring, for activities under section 1116 (b); or (2) may, with the approval of the local educational agency, directly provide for these activities or arrange for their provision through other entities such as school support teams or educational service agencies.

^v SEC. 1111(b)(3). Academic Assessments –(A) IN GENERAL- Each State plan shall demonstrate that the State educational agency, in consultation with local educational agencies, has implemented a set of high-quality, yearly student academic assessments that include, at a minimum, academic assessments in mathematics, reading or language arts, and science that will be used as the primary means of determining the yearly performance of the State and of each local educational agency and school in the State in enabling all children to meet the State's challenging student academic achievement standards, except that no State shall be required to meet the requirements of this part relating to science assessments until the beginning of the 2007-2008 school year.

^{vi} SEC. 1111(b)(3). Academic Assessments –(A) IN GENERAL- Each State plan shall demonstrate that the State educational agency, in consultation with local educational agencies, has implemented a set of high-quality, yearly student academic assessments that include, at a minimum, academic assessments in mathematics, reading or language arts, and science that will be used as the primary means of determining the yearly performance of the State and of each local educational agency and school in the State in enabling all children to meet the State's challenging student academic achievement standards, except that no State

ED estimates that the changes requested will add 20 burden hours to SEAs. The increase in burden hours detailed in the chart in question 12 above also reflects the addition of BIE as an agency participating in the CSPR collection, and thus, an increase in the number of agencies from 52 to 53.

ED anticipates that pre-population from *EDFacts* ultimately will reduce the CSPR burden; SEAs have two years to fully meet the *EDFacts* reporting requirements. ED fully expects beginning with the CSPR collection for SY 2008-09, when SEAs are in full compliance with *EDFacts* reporting requirements, the CSPR will move to full utilization of *EDFacts* data to pre-populate data cells in CSPR and the current estimated burden hours for CSPR will be reduced by 60%. Use of *EDFacts* to pre-populate CSPR was not factored in calculating burden hours for the current approved SY 2006-07 CSPR or in calculating the burden hours for this submission. (See Attachment D: *CSPR& EDFacts Crosswalk for SY2007-08.*)

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning

shall be required to meet the requirements of this part relating to science assessments until the beginning of the 2007-2008 school year.

^{vii} SEC. 1003(a). School Improvement – (a) State Reservations: Each State shall reserve 2 percent of the amount the state receives under subpart 2 of part A for fiscal years 2002 and 2003, and 4 percent of the amount received under such subpart for fiscal years 2004 through 2007, to carry out subsection (b) and to carry out the State’s responsibilities under sections 1116 and 1117, including carrying out the State educational agency’s statewide system of technical assistance and support for local education agencies.

^{viii} SEC. 1003(b). School Improvement – Uses: Of the amount reserved under subsection (a) for any fiscal year, the State educational agency – (1) shall allocate not less than 95 percent of that amount directly to local educational agencies for schools identified for school improvement, corrective action, and restructuring, for activities under section 1116 (b); or (2) may, with the approval of the local educational agency, directly provide for these activities or arrange for their provision through other entities such as school support teams or educational service agencies.

^{ix} SEC. 1111(h)(4). State Plans – Reports: Annual state report to the secretary – Each State educational agency receiving assistance under this part shall report annually to the Secretary, and make widely available within the State – (A) beginning with school year 2002-2003, information on the State’s progress in developing and implementing the academic assessments described in subsection (b)(3); (B) beginning not later than school year 2002-2003, information on the achievement of students on the academic assessments required by subsection (b)(3), including the disaggregated results for the categories of students identified in subsection (b)(2)(C)(v); (C) in any year before the State begins to provide the information described in subparagraph (B), information on the results of student academic assessments (including disaggregated results) required under this section; (D) beginning not later than school year 2002-2003, unless the State has received an extension pursuant to subsection (c)(1), information on the acquisition of English proficiency by children with limited English proficiency; (E) the number and names of each school identified for school improvement under section 1116(c), the reason why each school was so identified, and the measures taken to address the achievement problems of such schools; (F) the number of students and schools that participated in public school choice and supplemental service programs and activities under this title; and (G) beginning not later than the 2002-2003 school year, information on the quality of teachers and the percentage of classes being taught by highly qualified teachers in the State, local educational agency, and school.

and ending dates of the collection of information, completion of report, publication dates, and other actions.

SEAs will be asked to submit their Part I of the Consolidated Performance Report to the Department on or before December 17, 2008. Part II will be due February 27, 2008. The report covers the 2006-2007 school year. States are collecting or have already collected the data required by this CSPR and the data are necessary to meet the Department's program management and reporting requirements.

After State submissions are received, ED program staff will conduct a data quality review. Data reports for each question will be obtained as data extracts from *EDFacts*.

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.

Approval to not display expiration date has not been requested.

18. Explain each exception to the certification statement identified in the "Certification for Paperwork Reduction Act Submissions."

No exceptions were identified.

B. Collections of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results.

There are no statistical methods being use in this collection.