

Ed Tech Evaluation Reports - Comments Received			
	Comment	Submitter	Response
1	The annual submission date for the evaluation and accountability report should correspond with the submission date of the CSPR, Part II. By corresponding these submission dates, AKEED will be able to minimize collection efforts from the LEAs. This proposed reporting date allows sufficient time for the LEAs to report accountability and evaluation data for formula and competitive funds, especially with the potential obligation of funds until September 30th. The SEA will have time to review the evaluation data, summarize trends and prepare a report for ED.	Alaska Department of Education	<p>The Department disagrees that the due date for the evaluation report should be December 15 instead of September 30 of each year. The Department does not see the relevance of the due date for CSPR Part II, since the CSPR does not collect data on Ed Tech funded activities.</p> <p>The September 30 due date for the evaluation report was established to coincide with the end of the fiscal year and the end of the obligation period for the prior year's funding. The Department has requested a three-year approval. The final report under this approval would be due September 30, 2010, which coincides with the end of the obligation period for FY 2010 funds.</p> <p>Further, consultations with State Ed Tech directors indicates that for the most part, data are collected at the end of a given school year and analyzed during the summer.</p>
2	The annual submission date for evaluation reports should be delayed from October 1 to December 15 or later.	SEDTA	See response to #1.
3	First report should be for school year 2010-2011 not 2009-2010. Establishing a new process and accountability measures for the 2009-2010 school year which is already in process will be challenging for both the LEA and the SEA. Grant awards for 2009-2010 have already been issued making it difficult to add conditions.	Alaska Department of Education	The Department disagrees that a report on accountability measures and process covering SY 2009-2010 should be challenging. The requirement for states and LEAs to develop accountability measures has been in existence since the ESEA reauthorization in 2002. This collection merely requests that states report on the accountability measures and process that are in place for the state and LEAs. The Department does agree that a report on accountability measures so late in the 2009-2010 school year will not serve the purpose intended, which was for the Department to use the report as a basis for providing technical assistance to SEAs on their evaluation plans. The Department does not want to add unnecessary burden. Therefore, the Department has decided not to require two separate reports. The evaluation report due in September should provide sufficient coverage of SEA evaluation methods and measures.
4	Delay the due date for the first report until May 1, 2010.	Alaska Department of Education	The Department will not require a separate report on accountability plans. The SEAs evaluation methods will be covered in the single, annual evaluation report due on September 30. See response to #3.
5	Increase the standardization and methodological rigor of the proposed data collection. Consider adapting a subset of discrete items from the SETDA EETT State Profile Survey.	SEDTA	While a standardized approach to all SEA evaluations might be desirable, the reality of 53 discrete and diverse sets of program definitions, activities and accountability measures and evaluation plans makes standardization of the proposed the collection infeasible. In consideration of the benefit that greater standardization can provide, the Department will refine its instructions to require greater detail regarding information

			<p>With regard to the suggestion that the Department consider adapting a subset of discrete items from the SETDA State Profile Survey, there are critical distinctions between a survey and an evaluation in purpose, methods, and use. The intent of this collection is to identify through rigorous program evaluation methods and analysis, exemplary, evidence-based models innovative technology integration that have had positive impacts on teaching and student achievement and to disseminate those models for replication and scaling up. Using items from the SETDA survey will not yield the breadth and depth of information that this collection seeks. Nonetheless, the Department does acknowledge the usefulness of items from the SETDA survey as an evaluation tool for States to use, especially with smaller subgrants. See response to comment # 6 below.</p>
6.	<p>Set a minimum threshold for evaluation reporting requirements. Over 50% of LEAs in Alaska receive less than \$3000 of Title II, Part D funds. These small amounts available would be further limited by funds needing to be designated for accountability and evaluation purposes.</p>	Alaska Department of Education	<p>The Department acknowledges that many formula sub-grant amounts are not sufficient to fund activities that lend themselves to can “rigorous” evaluations of program effectiveness. The Department suggests that for these small allocations, states report, at least in a summary fashion, on the use of formula grant funds and the reported impact of those funds on technology integration, technology literacy, technology access or similar indicators related to the purposes of Title II, Part D.</p>

7	<p>There should be a minimum formula subgrant threshold of \$20,000, below which evaluation reporting requirements should not apply.</p> <p>The proposed data collection suggests evaluation reporting requirements apply to all competitive and formula subgrants, including how SEAs evaluate the effectiveness of both formula and competitive grantee expenditures.</p> <p>The basic structure of formula subgrants, however, does not permit SEAs to dictate areas of focus or minimum requirements. Additionally, in FY08, 77% of the formula subgrants awarded by states were less than \$5,000 and 36% of those were less than \$1,000; some formula subgrants are as small as \$1.</p>	SEDTA	<p>The Department does not have the authority to exempt LEAs from the accountability requirements. However, The Department does recognize that many formula sub-grant amounts will not be sufficient to fund “rigorous” evaluations of program effectiveness. In establishing its accountability measures and in its guidance to LEA. States should take into account the size of the formula subgrants within the state and the scope of evaluation would be feasible given various funding levels of the subgrant.</p>
8	<p>5% Administrative set-aside is not enough for evaluation, TA and other admin costs.</p>	SEDTA	<p>While the Department acknowledges that conducting methodologically sound evaluations within the 5% set-aside, has been challenging for states that receive smaller allocations, current legislative authority does not provide for additional administrative funds for evaluation. However, the Department believes that the infusion of \$650 million in ARRA program funds in FY 2009 should provide sufficient administrative funds for SEAs to enhance their program evaluation activities at least through FY 2011.</p>
9	<p>Exempt from accountability and evaluation requirements LEAs that REAP-Flex Title II, D Funds.</p> <p>LEAs are allowed the flexibility to REAP funds from the Title II, Part D program to other programs for consolidated efforts; therefore exception from these requirements is needed.</p>	Alaska Department of Education	<p>LEAs that are eligible for the Small Rural Schools Achievement (SRSA) program, whether they receive SRSA funds or not, may use the formula allocations they receive under Title II, D and other covered programs, for allowable activities under those programs and for activities under Title I, Part A and Title ii and Part B of Title I V. The Department has no authority to exempt SRSA eligible districts from the Title II, Part D accountability requirements.</p>

10	The Department underestimates the burden to SEAs to meet the evaluation requirements in this information collection request	SETDA	<p>The Department disagrees with the comment that the Department has underestimated the burden hours for this collection. The collection, if approved, would require States to prepare and submit evaluation reports and methods to the Department consistent with the evaluation/accountability requirements of the Title II, Part D of ESEA. Specifically, section 2413(b)(4) of ESEA requires that each State educational agency (SEA) that receives Ed Tech funds establish a process and accountability measures to evaluate the extent to which activities funded under the program are effective in integrating technology into curricula and instruction. Further, section 2414(b)(11)) that each local educational agency (LEA) or eligible local entity that seeks Ed Tech funds submit to the State, as part of its subgrant application, a description of the process and accountability measures that it will use to evaluate the extent to which activities supported with Ed Tech funds are effective in: (a) integrating technology into curricula and instruction; (b) increasing the ability of teachers to teach; and (c) enabling students to meet challenging State academic content and student academic achievement standards.</p> <p>The Department based the burden estimate for the current collection on the premise that the evaluation requirements have been in effect since the reauthorization of ESEA in 2002, and that states have had ample time to comply with the requirements and are in fact meeting the statutory requirements for conducting evaluations. The burden hour estimate is for the preparation of reports only.</p>
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