

**Supporting Statement:
Charter Schools Program (CSP) Grant Award Database**

PART A. JUSTIFICATION

A1. Circumstances Making Collection of Information Necessary

This request is for a renewal of OMB approval to collect data necessary for the *Charter Schools Program (CSP) Grant Award Database*. The CSP is authorized under Title V, Part B, Subpart 1, Sections 5201 through 5211 of the Elementary and Secondary Act (ESEA) of 1965, as amended by the No Child Left Behind (NCLB) Act of 2001. Under Title V, Part B, Section 5205 of the ESEA, the Secretary reserves CSP funds to carry out national activities to provide charter schools with information, to evaluate and study charter schools, and to provide other types of technical assistance.

This current data collection is being coordinated with the *EDFacts* initiative to reduce respondent burden and fully utilize data submitted by States and available to the U.S. Department of Education (ED) through the Education Data Exchange Network (EDEN). Specifically, under the current data collection, ED collects CSP grant award information from grantees (State agencies and some schools) to create a new database of current CSP-funded charter schools and award amounts. Once complete, ED merges performance information extracted from the EDEN database with the database of CSP-funded charter schools. Together, these data allow ED to monitor CSP grant performance and analyze data related to accountability for academic performance, financial integrity, and program effectiveness.

Identifying Data Needs

The first task in reaching the project's goals was to develop a reporting system to gather consistent and complete data on CSP SEA grantees and on charter schools nationally. The data required by ED are:

- Detailed financial information on States' implementation of CSP grant activities
- Data responding to ED and CSP performance and efficiency measures
- National charter school information from other data sources, such as the Common Core of Data and EDEN

ED specified several aspects of program effectiveness and efficiency that the data collection should address. They included the program information needs outlined in the January 2005 Government Accountability Office (GAO) report, program information for determining achievement of the CSP Government Performance and Results Act (GPRA) indicators, and other information to respond to the Office of Management and Budgeting (OMB) Program Assessment Rating Tool (PART).¹

GAO Reports

In January 2005, GAO issued a report entitled *To Enhance Education's Monitoring and Research, More Charter School-Level Data Are Needed* which examined (1) how States allow for charter school flexibility, (2) how States promote accountability for school performance and financial integrity of charter schools, (3) the implications of NCLB for charter schools, and (4) the role ED plays in charter school accountability. In the report, GAO recommended that ED help States, which are CSP grant recipients, track Federal funds to charter schools and report the number of charter schools started with CSP funds. In addition, GAO recommended that the CSP link its own data collection with the newly developed *EDFacts* data collection (formerly Performance Based Data Management Initiative, PBDMI). The current data collection has begun the process of accomplishing these recommendations.

OMB Review of GPRA Indicators

Congress enacted the Government Performance and Results Act (GPRA) in 1993 in an effort to reduce waste and inefficiency in Federal programs and promote accountability. GPRA called on each Federal agency to produce annual performance plans and reports beginning in 1999 that were to include quantifiable and measurable performance goals and performance indicators for the programs in each agency. For CSP, the original GPRA goal was to encourage the development of a large number of high-quality charter schools. As a result, two indicators have been used to measure the success of this goal: (1) the number of charter schools in operation around the nation and (2) the number of States with charter school legislation.

OMB, which has responsibility for approving GPRA indicators, also reviews the value of the indicators and the processes used to gather the data. ED and OMB jointly reviewed the CSP using Performance Assessment Rating Tool (PART). Following the review, the CSP office proposed three new GPRA performance indicators:

- The percentage of charter school students in grades 4 and 8 at or above proficiency in reading

¹ http://www.whitehouse.gov/omb/budintegration/part_worksheet_competitive_grant_programs.xls

- The percentage of charter school students in grades 4 and 8 at or above proficiency in mathematics
- The Federal cost per pupil in a successful charter school (with “successful” defined as a school open for three or more years)

Additional Reports

Charter school researchers have also pointed to the need for more complete data on charter schools, primarily in the interest of policy research. For example, Lake and Hill (2005) identified areas of State and local record keeping that need improvement. Writing for the National Charter School Research Project (NCSRP), they found that data on student characteristic data such as race/ethnicity, free/reduced-price lunch, special education, and English language learners (ELL) were hard to get from State charter school offices. NCSRP also had difficulty obtaining data on how charter schools were performing within Federal and State accountability systems, including the percentage of charter schools making adequate yearly progress (AYP) and the percentage of charters labeled as low-performing. Other charter school-related data NCSRP had difficulty finding from existing sources were charter school per-pupil funding, waiting lists, parent satisfaction, and class size.

Data to be Collected

Based on the information needs of ED and the recommendations of the GAO and OMB, ED created a new database of current CSP-funded charter schools and their award amounts. Funding for charter schools is provided in two ways: directly to the charter schools and through a State agency who awards grants to charter schools. Under the current data collection, ED collects data from both State agencies and charter schools.

As of August 2008, 40 States (including the District of Columbia) have charter school legislation. Twenty-seven of these States have active CSP grants. The CSP also provides direct grants to 41 charter schools across 8 other States (AZ, MS, MO, VA, IL, NH, OK, HI). The process for collecting data from the State agencies and charter schools is outlined below.

Collect CSP Subgrant Award Information from State Agencies: Each State agency that received a Federal CSP grant will be asked to provide the information in Table 1 for the subgrants it awarded from Federal fiscal year funds. The collection form will be customized for each State agency to include the year, award number, and award amount of the CSP grants. Providing information on the CSP grants to the State agencies should assist them in gathering the information for this collection. Also at this time (first contact), information describing all phases

of data collection, total burden, and the use of additional data sources (EDEN) to reduce burden will be provided to the State agencies.

Collect CSP Grant Award Information from Charter Schools Funded by Direct Grants:
 The CSP grant award information for the grantees that are not States but received direct grants from ED will be extracted from the Grant Administration Payment System (GAPS) database. However, NCES IDs, which are required for linking of other information, are not always available in GAPS and will need to be collected from the recipients. ED will require the recipients to verify all of the same information described in Exhibit 1, and to fill in any missing information.

Exhibit 1

Data Elements Included in the Database of Current CSP-Funded Charter Schools and Award Amounts

Information for Each Federal Fiscal Year CSP Subgrant	Detail
1. Subgrantee identification (the entity that received the funds)	<ul style="list-style-type: none"> • Subgrantee name • Subgrantee State ID • Subgrantee mailing address
2. LEA of the subgrantee (will allow matching of subgrant award information to information from other sources)	<ul style="list-style-type: none"> • LEA name • LEA NCES ID • LEA State ID • LEA mailing address • LEA location address • Whether it is an LEA with only charter schools (yes or no) • Whether the charter school acts as its own LEA (yes or no) Note: Not all charter schools are approved by a separate LEA
3. Charter school(s) funded by the subgrant, including future schools (will allow matching of subgrant award information to information from other sources) Note: ED will assist States in obtaining NCES IDs for any charter school without an ID.	<ul style="list-style-type: none"> • Charter school name • Charter school NCES ID • Charter school mailing address • Charter school location address
4. Subgrant information	For each charter school listed in #3 above: <ul style="list-style-type: none"> • Dollar amount of subgrant award from each Federal

<p>Note: States will be provided with their award number, the total dollar amount of the award, the grant period, and draw-downs.</p>	<p>fiscal year</p> <ul style="list-style-type: none"> • Month and year of each subgrant award • Type of subgrant (Preplanning, Planning and Program Design, Implementation, or Dissemination)
<p>5. Charter school operation</p>	<p>For each charter school listed in #3 above:</p> <ul style="list-style-type: none"> • School year school first enrolled students (school year, or “not applicable” for future schools or closed schools) • Student enrollment data for past three years

To assist the State agencies, these data are currently collected using a preformatted spreadsheet. For example, the form for each SEA includes the award number, the dollar amount of the award, the grant period, and draw-downs. The product of this data collection is a database of subgrant award information from State agencies and direct grant recipients. As necessary, ED contacts the grantees to verify collected information described above to ensure an accurate and complete dataset.

A2. Purpose and Uses of the Data

Renewal of OMB approval will allow ED to collect data from current grantees throughout their three-year performance period. The data collection, combined with the student demographic and performance information extracted from the EDEN database, will allow ED to monitor CSP grant performance and analyze data related to accountability for academic performance and financial integrity. This will satisfy Title V, Part B, Section 5205 of the ESEA, which calls for national activities related to the collection of information, technical assistance, and information dissemination regarding charter schools and the CSP.

As part of the General Education Provisions Act (GEPA) 424 data collection, ED collects information on the allocation of Federal grants by States who are recipients, including grants under CFDA 84.282. ED has collected the GEPA data for fiscal years 2002, 2003 and 2004. CSP grants are forward funded. Therefore, the GEPA data currently available relates to school years 2002-2003, 2003-2004 and 2004-2005. The current CSP data collection began with fiscal year 2005, which roughly corresponds to school year 2005-2006, and the information collected was used in place of the GEPA data collection. The collection of grant information is needed for both GEPA and the CSP. Note that all the demographic and performance data needed for the CSP office is also needed for other purposes. For example, both the CSP and the Office of Special Education Programs need the number of Children with Disabilities (IDEA) in each charter school.

A3. Use of Technology to Reduce Burden

To assist State agencies and charter schools, the current and future data will be collected using a preformatted Excel spreadsheet, which will be emailed to respondents and completed electronically. All data readily available to ED are included in the spreadsheet. For example, the form for each SEA includes the award number, the dollar amount of the award, the grant period, and draw-downs. The State agency only provides the subgrant award information that is not accessible elsewhere.

As the respondents complete the forms, additional assistance is made available via email and telephone. A toll-free number and email address are available to State agencies and charter schools to allow them to contact the project team with any questions or requests for assistance as they use the form to submit data. This information, along with the names of project contact persons, are clearly printed on the data collection forms and all correspondence.

A4. Efforts to Identify Duplication

Under NCLB, ED must ensure that new and expanding charter schools receive timely payment of Federal grant funds for which they are eligible. Although ED currently tracks payments to the fiscal agent (generally an SEA or LEA), it does not track payments to the school level. The current and future data collection will allow ED to track CSP grant funds to the school level and gather CSP-related financial information currently unavailable anywhere else.

The data collection efforts under this project gathers CSP subgrant award information from State agencies and CSP grant award information from charter schools funded by direct grants. That data alone, however, does not provide enough information to draw conclusions about program effectiveness and efficiency. To ensure that a complete dataset is available, ED combines the new CSP database with data extracted from EDEN. This creates a complete dataset, maximizes the use of existing data sources, and reduces the data collection burden on State agencies and charter schools.

A5. Methods to Minimize Burden on Small Entities

The current and future data reporting collects data primarily from SEA officials in charge of CSP grants in each State. The exception to this occurs among the 41 CSP-funded schools in AZ, MS, MO, VA, IL, NH, OK, and HI. Schools in these States received direct grants from the CSP, making them individually responsible for providing the requested data. Regardless of

whether the reporting is done by SEA officials or individual schools, the impact on small entities is expected to be minimal.

A6. Consequences of Not Collecting the Data

The proposed data collection and subsequent merging of CSP data and EDEN data will provide ED with the data necessary to effectively monitor the performance and financial stewardship of CSP. The data collection process will be transparent, and the data to be collected will be consistent and easy to consolidate. Failure to collect the new CSP funding data – data not available in EDEN – would seriously hinder ED’s ability to assess CSP’s financial integrity and the link between funding and student outcomes. Further, only by combining CSP financial data with performance data derived from EDEN can ED measure CSP’s three GPRA indicators: (1) the percentage of CSP-funded charter school students in grades 4 and 8 at or above proficiency in mathematics; (2) the percentage of CSP-funded charter school students in grades 4 and 8 at or above proficiency in reading; and (3) the Federal cost per pupil in a successful CSP-funded charter school.

A7. Special Circumstances

This information collection fully complies with 5 CFR 1320.5.

A8. Federal Register Comments and Persons Consulted Outside the Agency

For the current data collection, a 60-day notice about the collection was published on July 18, 2006 in the Federal Register inviting comment on the proposed data collection. A 30-day notice was published on September 22, 2006 also inviting comment. ED will invite public comment on the renewal of this data collection using a similar process. If OMB approval is renewed, we will place the OMB control number and expiration dates on all data collection forms and related correspondence.

The current data collection benefited from the expertise of an external advisory panel created by ED. This group, comprised of five CSP SEA grantees, provided feedback on ED’s data reporting design and burden associated with aggregating and providing information.

As an early step in the development of the data reporting, WestEd conducted a focus group with the advisory panel following a coordinators’ meeting in December 2005. In addition to the five CSP SEA grantees, representatives from the Office of Innovation and Improvement (OII), the CSP, and the National Alliance for Public Charter Schools participated. The researchers and focus group participants reviewed CSP reporting requirements and discussed data elements and

possible training needs associated with the new project. Their input influenced the data elements collected to date.

A9. Payment or Gifts

There are no payments or gifts to respondents other than the allocation of Federal funds that result from the CSP grant award.

A10. Assurance of Confidentiality

This collection does not involve collecting any confidential information. Therefore, no assurances of confidentiality are required.

A11. Justification of Sensitive Questions

This project does not include any questions of a sensitive nature. As required by the Paperwork Reduction Act of 1995, information is provided to respondents about purposes of the data collection and how the information will be used by ED to monitor CSP grant performance and analyze data related to academic and financial accountability.

A12. Estimates of Hour Burden

The estimated annual response burden is 110.25 person-hours. Exhibit 2 aggregates the estimated total hours and costs to participants. The following section explains how burden estimates were calculated. The hourly rates of pay for SEA and LEA/school officials were estimated from California Department of Education Financial Data.

Exhibit 2

Estimating the Burden for Reporting

Type of Respondent	Number of Respondents	Number of Subgrants and Direct Grants	Total Minutes per Subgrant	Total Hour Burden	Hourly Rate	Monetary Burden
SEA CSP grantee	27	1,200	5	100	\$52	\$5,200
LEA/School grantee	41	41	15	10.25	\$36	\$369
TOTAL	68	1,241	-	110.25	-	\$5,569

The respondents in this data collection are the CSP grantees. Some grantees are SEA officials coordinating and managing the CSP subgrants in each State. Other grantees are officials from CSP-funded charter schools in AZ, MS, MO, VA, IL, NH, OK, and HI. Schools in these States apply directly to ED for CSP funds, making them individually responsible for providing the data requested by ED.

There are currently 40 States, including the District of Columbia, with charter school laws. For 27 of these States, the SEA CSP official will be responsible for submitting data to ED on all the subgrants awarded by the State. In the eight States in which CSP grants are awarded directly to charter schools, 41 schools currently receive CSP grants. Each of these schools will also submit data to ED, making the total number of respondents 68.

We estimate that submitting the data for each CSP subgrant will take anywhere from 5 to 15 minutes, depending on how many years the school (subgrantee) has received funding and if the school is currently serving students. In the latter case, no enrollment data is collected and so the number of data elements to report on is reduced. Further, as grantees update their data collection forms in subsequent years, they need only update the award amount and add any new subgrants to the database, further reducing the overall reporting requirements over the course of the CSP grant.

For SEA respondents, the total burden will vary depending upon the number of subgrants their State awards. The 27 States that receive CSP grants currently award just over 1,200 subgrants to individual schools. The total burden for all SEA officials is 100 hours. In the case of schools or LEAs that receive their grants directly from ED, the total burden is 10.25 hours. We are allowing more time for LEA respondents to complete the form because they also need to verify the grant award amount from ED.

The estimated total time for the reporting is 110.25 person hours at an estimated total cost of \$5,569.

A13. Estimate of Cost Burden to Respondents

There are no additional respondent costs aside from those outlined in section A12.

A14. Estimate of Annual Cost to the Federal Government

The total cost to the Federal Government for the data collection is \$250,000 annually. These costs are associated with (1) determining the data elements to be included in the reporting, (2) providing technical assistance to respondents on how to complete the data collection form, (3) merging the CSP grant award information with EDEN data to create a complete dataset of financial, demographic, and achievement data for CSP schools, and (4) analyzing and reporting on the data from all CSP grantees for ED. The project is funded for one year with the option for four additional years. The total cost across all 5 years would be \$1,250,000.

A15. Program Changes or Adjustment

Ed is seeking approval to amend the Charter School Program (CSP) Data Collection Forms (OMB control # 1855-0016) to add one new question and provide clarification on a second question. The current Forms ask CSP grantees (typically SEAs) to report the following information for each sub grant within the State's 36 month project period: 1) the name and contact information for the charter school and LEA; 2) the charter school developer (if different than the charter school) 3) the total amount of funding an applicant received to start a charter school, along with the beginning and end date of the grant project period and budget periods; and 4) other charter school information (e.g., enrollment) as needed.

The proposed amendment to the forms would clarify the charter school developer question (#2 above) and ask grantees to provide the charter school's management organization (CMO, EMO or freestanding). A new question would also be added to ask grantees to report the charter authorizing agency. The increase in burden would be one additional question/data element per sub grantee. The number of respondents will remain the same. The total annual hours across all respondents would increase from 110 to 127 hours.

A16. Plans for Tabulation and Publication of Results

One of the data collection requirements is to analyze, report, and summarize the data obtained from SEA grantees. The current analysis plan addresses various aspects of program effectiveness and efficiency such as the program information needs outlined in the January 2005 GAO report, program information required to determine achievement of CSP GPRA indicators, and other information to successfully respond to the OMB PART. From this analysis, ED and the

CSP can effectively monitor CSP grant performance and analyze data related to accountability for academic performance and financial integrity.

Upon renewal of OMB approval we will continue to produce annual reports summarizing the data collection and analysis process. The reports will be written and organized with a national audience in mind, therefore making the content usable for a variety of readers, including charter school developers, operators, board members, teachers, parents, researchers, and authorizers. Further, we will be prepared to brief program staff and/or policy makers about results as needed throughout the study's duration.

Finally, we will prepare a data file containing all data collected. This data file will include an explanation of contents, including variable and category labels, weights, a description of how missing data were addressed, and the unit of observation for each data file.

A17. Approval to Not Display OMB Expiration Date

No request is being made for exemption from displaying the expiration date.

A18. Explanation of Exceptions

This collection of information involves no exceptions to the Certification for Paperwork Reduction Act Submissions.

PART B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

The results of this information collection will not be published for statistical purposes.

Citations

Government Accountability Office (January 2005). *Charter Schools: To enhance Education's monitoring and research, more charter school-level data are needed*. Washington, D.C.: Government Accountability Office.

Government Accountability Office (October 2005). *Education's Data Management Initiative: Significant progress made, but better planning needed to accomplish project goals*. Washington, D.C.: Government Accountability Office.

Kolderie, Ted (October 2003). *Evaluating chartering: A case for assessing separately the institutional innovation*. St. Paul, MN: Education Evolving.

Lake, Robin J., and Paul T. Hill, Editors (November 2005). *Hopes, fears, & reality: A balanced look at American charter schools in 2005*. Bellingham, WA: National Charter School Research Project, Center on Reinventing Public Education, Daniel J. Evans School of Public Affairs, University of Washington.