

Paperwork Reduction Act Submission Supporting Statement

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

Introduction

The Consolidated State Performance Report (CSPR) is the required annual reporting tool for of each State, the 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. The CSPR consists of two parts. Part I of the CSPR collects data related to the five ESEA 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 ESEA, 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, 2011. The Department is requesting SEAs to submit their Part I of CSPR for SY 2009-10 on or before December 17, 2010. Part II will be due on or before February 11, 2011.

This submission requests approval to add two (2) new items to Section 1.1 *Standards and Assessment Development* of CSPR Part I.

Note: This submission is only for approval of the new items. The remainder of the Sections and items in CSPR will remain substantially the same and are approved until the October 31, 2011.

A. Justification

1. **Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The CSPR is the annual reporting tool established by the Secretary for each State to report on program performance under the ESEA. The CSPR is currently approved until October 31, 2011.

This collection requests addition of 2 new items to the CSPR Part I to obtain information on States' uses of funds under Section 6111 of the ESEA. The additional items are requested at this time to inform impending policy and program improvement decisions about State assessments under the ESEA.

The Department is evaluating the assessment and accountability requirements in the ESEA, and States' implementation of those requirements, with the goal of improving the quality of State assessment programs. Of particular interest pursuant to that goal is States' use of Section 6111 funds and how those funds might more effectively be used to improve the development and administration of quality State assessments.

Currently, the Department has no comprehensive data to assess how Section 6111 funds are being used for assessment development and administration. The two new items would provide a 52-state profile of the uses of Section 6111 funds.

The specific changes are detailed on page two of the CSPR Part I document, in Section 1.1 *Grants for States Assessments and Related Activities*.

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.**

In general, 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; (3) monitor States' implementation of the ESEA and the extent to which States are meeting program and accountability goals; (4) identify areas for technical assistance to States and overall program improvement; (5) inform policy and program improvement; and (6) inform other reporting and program evaluation requirements.

The Administration will use the data from this collection as a basis for future policy decisions to make more effective use of these funds, to establish competitive preference priorities for Section 6112 funds (the competitive grant program associated with Section 6111); and to assess the need for increased funding in subsequent budget proposals.

The program office will use the information to monitor compliance and to obtain a clear understanding of the needs of States to inform program office technical assistance initiatives.

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.**

SEA respondents will enter their responses to the two new items manually through the CSPR/EDFacts online submission system as part of the SY 2009-2010 CSPR online submission.

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.**

The two new items requested for the CSPR are not currently collected in any collection tools approved by the Department. The intent is to include these data as a part of the annual ED Facts collection in future years or as amended after reauthorization.

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 this reporting instrument, the Department will not have the means to obtain sufficient data with which to systematically monitor and evaluate States' implementation of assessment and accountability requirements, specifically related to uses of funds under Section 6111 of the ESEA.

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 Assessment and Accountability officials and other SEA leadership, and CSPR and ED*Facts* coordinators. Consultations occur through ongoing program monitoring and technical assistance, program related conferences, data conferences, Webinars and teleconferences, which enable ED to ascertain the availability and quality of the required data.

Additionally, the Department provided the public the opportunity to comment under the 60-day comment period notice. The Department received one comment and will publish the 30-day comment period notice in Federal Register informing the public when this request is submitted to the Office of Management and Budget. The Department's response to the public comment is stated below.

The Department received a question regarding section 2.1.3 of CSPR Part II, where the commenter wanted ED to provide the definition for the category for administrators (non clerical). The program office provided the following definition, which uses the Common Core of Data (CCD) definition for school administrator.

School Administrator (District): Staff whose activities are concerned with directing and managing the operation of a particular school. Category includes principals, assistant principals, and other assistants; and persons who supervise school operations, assign duties to staff members, supervise and maintain the records of the school, and coordinate school instructional activities with those of the education agency, including department chairpersons.

States should note that depending on how an LEA administers its Title I program, there may not be any administrators funded by Title I in a TAS.

- 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 values below which individual students could be identified 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. .

Currently, the total annual reporting and recordkeeping burden for the SY 2009-10 CSPR collection is estimated to be 11,838.3. The annual burden to each of 53 SEA respondents for the CSPR collection is estimated to be 33.84 hours. The two new items will not require new or additional data collection. Information required to respond to the new items already is available and accessible by each SEA receiving Section 6111 funds. The estimate of additional burden to SEAs is for reporting only. The Department estimates that the two additional items will increase the SEA burden by 0.5 hours to 34.34 hours per SEA respondent for a total increase of 26.5 burden hours. The combined burden to States for this information collection will be 1,820.02 hours. The LEA burden will not increase. The total new estimated burden will be 11,864.82.

CSPR Part I and II	SEA Burden hours	LEA Burden hours	Total
Approximate # of agencies	53	14,600	14,653
Average burden per agency	34.34 hours	.688 hours	

Total for 1810-0614	1,820.02 hours	10,044.8 hours	11,864.82
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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 \$284,755.68, which is equivalent to 11,864.82 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 \$40,000 for program staff time.

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

The two new items will inform Department policy aimed at improving State's use of 6111 funds the development and administration of quality State assessments. The Department estimates that the total burden hours for the revised CSPR Part I and Part II combined will be 11,864.82 hours.

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

SEAs will be asked to submit Part I of the SY 2009-10 CSPR to the Department on or before December 17, 2010. Part II of the CSPR will be due February 11, 2011. The two new items pertain only to Part I. After State submissions for Part I have been received, ED program staff will conduct a data quality review. During the review, SEAs will have the opportunity to correct and resubmit final data. Data quality review Part I will be completed on March 11, 2011. After final data have been certified by SEAs, ED will review the submissions for reported values (N's) below

which individual students might be identified. Once low N's have been suppressed, ED will publish Part 1 of each SEA's CSPR on our website at www.ed.gov. Reports will be posted no later than June 1.

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 used in this collection. Use of statistical methods in this case would not reduce burden or improve accuracy of results.

CSPR data are stored in ED Facts for the use by program offices to extract needed data for various program purposes. The online portal is merely a report, and no data will be manipulated at that level. The data will also be published on the Department's website.

ⁱ The Consolidated State Performance Report (CSPR) includes data from state education agencies that track progress in implementing the *ESEA*. 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 ED Facts*, 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.