

**SUPPORTING STATEMENT FOR REQUEST FOR OMB APPROVAL UNDER  
THE PAPERWORK REDUCTION ACT**

A. JUSTIFICATION

1. Circumstances necessitating information collection.

In the Individuals with Disabilities Education Act of 2004 (IDEA), Congress stated that “the education of children with disabilities can be made more effective by... supporting high-quality, intensive preservice preparation and professional development for all personnel who work with children with disabilities in order to ensure that such personnel have the skills and knowledge necessary to improve the academic achievement and functional performance of children with disabilities” (Section 601(a)(5) (E)). The Office of Special Education Program's (OSEP) Personnel Development to Improve Services and Results for Children with Disabilities (CFDA No. 84.325) funds one of the largest personnel preparation grant programs in the U.S. Department of Education. In order to ensure that OSEP is meeting the needs of children with disabilities and their families, OSEP needs to collect data on the results of its grant awards for program evaluation purposes. This includes the number and characteristics (e.g., minority status, related professional experience) of professionals trained and the program outcomes (e.g., program completion, certification, employment in area supported by training). These data are collected to assess program effectiveness and efficiency, and to meet the reporting requirements of the Government Performance and Results Act (GPRA) and the Program Assessment Rating Tool (PART). The data will provide information on the supply of the OSEP-funded projects nationally, within each state, and within and across personnel categories, including special educators certified to teach children with disabilities, university faculty, related-service personnel, preschool service providers, paraprofessionals, administrators and other personnel.

Analysis of these data will be used in the following ways: a) to inform the activities and priorities specific to personnel preparation conducted by OSEP, U.S. Department of Education; b) to determine variation in personnel preparation and factors related to that variation; and c) to evaluate the outcomes of the IDEA and the Personnel Development Program (PDP) performance measures under GPRA and PART.

OSEP is revising this data collection instrument for a few reasons. To further refine the data collection on certain scholars, we added three items to improve performance measure reporting, eliminated two items to significantly reduce work burden without adversely affecting performance measure reporting, and reorganized the web-based collection to improve efficiency through greater use of drop-down boxes, rather than data entry by the grantee. Enhanced instructions for a few items make the form more user-friendly and diminish response ambiguity. Finally, a term was changed in the SDR to be consistent with the language used in the IDEA reauthorization.

First, we added three items to the data collection instrument to collect data for reporting under GPRA and the PART. These additional items will only be completed for certain scholars upon entry into the grant supported program or for those scholars who exited the training program prior to completion and do not apply to all scholars for each year enrolled. These items were added to provide further analysis of data on the PDP program efficiency measure, the Federal cost per degree or certification program recipient working in the area(s) in which they were trained upon program completion.

The last two items in Section A were added to ensure accountability for efficient expenditure of funds. One item determines if the scholar received funding under a different OSEP grant; the other item, requested by grantees funded under the Leadership Priority (325D), as well as OSEP, to track the number of credit hours scholars had earned prior to enrollment that were accepted toward program completion. (This affects approximately 12% of scholars.) Both items will provide additional data for reporting the program efficiency measure.

Grantees reported to OSEP that the current instrument did not allow them to indicate that a scholar would complete a degree/certificate/endorsement after the grant ended. The system tracks active grants, and the last item in Section E was added to indicate that a scholar will complete or has completed the program after the grant ended. This item will only be answered if the grantee reports that the scholar exited prior to completion because the grant ended. Annually, between 300 and 350 scholars do not complete their grant programs prior to the grant end date. This item will only be used when the scholar exits the program under unique circumstances, and this applies to about 4% of all scholars.

Secondly, OSEP eliminated two items in Section E that collected information on the type of measure and the exact measure score on scholars' knowledge and skills when a scholar completed the program. The data supplemented data required for performance measure reporting on the scholars' attainment of knowledge and skills, but was found to be too burdensome to report. This modification will reduce grantee work burden, diminish response ambiguity, and simplify data entry and analysis. Again, based on feedback from grantees, we enhanced instructions for a few items to make the form more user-friendly and diminish response ambiguity, and created no additional burden for grantees.

Thirdly, OSEP requested that the term "students" be replaced throughout the SDR with the term "scholar" to be consistent with Section 662 of IDEA.

In summary, because OSEP is revising its data collection to increase the efficiency of its use by grantees and has requested only additional information on a small subset of scholars, OSEP will be able to more accurately plan for program improvements without creating additional burden for grantees. Also, OSEP will be able to more accurately and efficiently respond to reporting requirements for GPRA and PART.

### **Authorization for Collection**

This data collection is authorized by the following Public Law:

- (1) Public Law 108-446, Section 682(c) (20 U.S.C. 1482) “The Secretary may use funds made available to carry out subpart 2 or 3 to evaluate activities carried out under subpart 2 or 3, respectively.”
- (2) Public Law 108-446, Section 662(a) (20 U.S.C. 1462) “The Secretary shall, on a competitive basis, make grants to, or enter into contracts or cooperative agreements with, eligible entities...to help address the needs identified in the State plan... for highly qualified personnel...to work with infants or toddlers with disabilities, or children with disabilities.”

Further, Education Department General Administrative Regulations (EDGAR) require that grantees cooperate in any evaluation of the program by the Secretary (EDGAR, Sec 75.591) (20 U.S.C. 1221e-3 and 3474).

Ensuring an adequate supply of personnel to serve students with disabilities is critical to meeting the letter and the intent of the IDEA. During the 2004 IDEA reauthorization hearings, Congress heard testimony from numerous stakeholders emphasizing the critical need for highly qualified service providers. In amending IDEA in 2004, Congress reasserted its support for intensive professional development that will give personnel the knowledge and skills they need to help students meet challenging educational goals and lead productive, independent adult lives (Section 601(c) (5)(E)).

This Scholar Data Report (SDR) is to be completed annually by all grantees supported under Personnel Development to Improve Services and Results for Children with Disabilities, CFDA No. 84.325. The SDR is divided into two parts. Part I, Project Identification, consists of standard identification information on the grantee. Part 2, Pre-service Personnel Data, collects information on scholars receiving *pre-service* training and is divided into six sections.

Section A collects information on scholar demographics and other characteristics. Section B collects information on the scholar's training and employment prior to enrollment in the current OSEP-supported program. Sections A and B are to be completed when the scholar enters the program and will not change throughout the scholar's enrollment history.

Section C collects information about the characteristics of the scholar's current OSEP-supported training. Section D collects information about the scholar's outside employment during training. Sections C and D must be updated annually.

Section E collects scholar's training status information at the time of the scholar's graduation, dropping-out of the program, or the end of the grant project. Section F collects scholar's employment information at the time of the scholar's graduation, dropping-out of the program, or the end of the grant project. Sections E and F are to be completed just once for each scholar when the scholar exits the program (either through graduation or non-completion), or when the project ends. These data will assist OSEP in assessing program effectiveness.

2. Use for which the information is gathered.

This information will be used by OSEP to provide information on the characteristics of teachers and other personnel supported in these training programs and the outcomes of the programs (program completion, certification, employment in the area supported by training, etc.). Collection of these data is critical in assessing accountability for the grant program.

These data, submitted annually, also serve as the primary source of information for OSEP to assess program progress for grants funded under Personnel Development to Improve Services and Results for Children with Disabilities, CFDA No. 84.325.

3. Use of improved information technology.

OSEP will collect the data in a web-based data collection. Grantees will be given a username and password and will enter data on scholars supported under their grants on the OSEP PDP website. The system is designed to direct grantees to the appropriate questions and the likelihood that grantees will answer unnecessary survey items, thus minimizing the work burden.

4. Efforts to identify duplication.

Information in the SDR does not represent any duplication of paperwork, content, reporting, or performance report for scholars pre-enrollment, enrollment, and employment during the training program, and knowledge and skills.

Some duplication exists for grants funded after fiscal year 2005. The National Center for Service Obligation (NCSO) collects information from these grantees on the scholars' employment after exiting their training programs. OSEP directed NCSO to use items similar to those in the Scholar Data Report Section F to minimize burden on the grantees as the question format would be familiar, and the information would have been prepared. For the next data collection, we will explore options to transfer this exiting data to NCSO to populate their database, thereby further reducing work burden for grantees.

5. Small businesses.

The information requested does not involve the collection of information from entities classified as small organizations.

6. Consequence of less frequent collection.

These data are needed annually so that OSEP can meet its PDP annual performance measure reporting requirements under GPRA and PART.

7. Special circumstances.

There are no special circumstances associated with the collection of these data.

8. Federal Register notice/consultation outside agency.

We published the appropriate 60- and 30-day Federal Register notices to allow for public comment.

OSEP annually supports a meeting of grantees who receive funds under Personnel Development to Improve Services and Results for Children with Disabilities, CFDA No. 84.325, at which data collection issues are discussed. In addition, OSEP's contractor contacted several grantees to determine whether any items were particularly problematic and if the current revisions would address those concerns. Comments from grantees were used to clarify questions and response options on the survey instrument.

9. Payment of gifts to respondents.

No payments or gifts are provided to respondents for completing this information request.

10. Assurance of Confidentiality.

Each grantee is required to refrain from listing student names and Social Security Numbers on the forms. Scholar Identification numbers should be assigned to each scholar and maintained by the grantee. OSEP will not analyze individual scholar level data. No assurance of confidentiality is provided to respondents.

11. Questions of a sensitive nature.

There are no questions of a sensitive nature included in this data collection. Race/ethnicity data are collected in this performance report. The IDEA 2004 emphasizes that the training of professionals in the area of special education by minority individuals is essential if the nation is to obtain greater success in the education of minority children with disabilities (Section 601(10)(D)). Collecting these data will assist in analyzing and increasing the number of minorities trained in special education.

12. Estimate of respondent burden.

The mean time for filling out the revised form will be 26 minutes for each student (the same as the last form). OSEP serves approximately 8,000 students in approximately 450 personnel preparation grants, which result in an average of 18 students per program. Assuming the mean number of students per program (18) and the mean burden (26 minutes), the average burden will be 468 minutes or 7.8 hours per project for a total of 3,510 annual hours.

Burden is determined by examining two factors. First, adjustments are defined as burden due to additional students per grantee. Secondly, program changes are defined as burden due to addition of items on the data collection instrument based on program need. To determine burden due to each of these factors, a number of variables are used. The methodology for determining each burden factor is described.

**Adjustments.** The number of students per grantee has remained constant since the last revision and did not impact the burden estimate.

**Program changes.** Given the former data collection based on approximately 18 students per grantee, although one item was added for all scholars upon entry (approximately 450 grantees), a second item was added for only those scholars enrolled under Leadership grants (approximately 12% of all scholars); and third item was added to indicate that a scholar will complete or has completed the program after the grant ended. All three items should increase accountability for grant outcomes. One change will improve the efficiency of entering data by providing data in drop down list, thus avoiding more time intensive data entry and significantly reduce work burden. Two items were eliminated due to the drop down list.

Estimate of cost to respondent. Respondent costs per grantee site are estimated at \$20 per hour, and the total number of burden hours for the survey is estimated at 3,510. The total estimated cost to all 450 respondents is \$70,200, and the estimated cost per respondent is \$156. (\$20 per hour x 3,510 hours = \$70,200 total estimated cost to respondents; \$70,200 total cost/450 respondents=\$156 cost per respondent)

13. Respondent startup costs.

There are no startup costs.

14. Estimate of costs to the Federal Government.

The following table represents the estimated costs to the Federal Government associated with this data collection. All communications with grantees is done electronically. The contractor data services amount includes the costs for monitoring and customer service to respond to questions from grantee on data collection. These data are based on a new contract that was awarded on 9/24/2010.

Xerox	0
Mailing	0
Staff	0
Contractor Data Services	202665
Total	202665

15. Reasons for program changes or adjustments

Program changes will result in an improved efficiency while maintaining the same work burden as the prior data collection. OSEP added three items to the data collection instrument to better measure the experience of

a small subset of scholars participating in these grant programs and to improve program accountability.

First, a few scholars continue the same training program under a new grant. OSEP will be able to identify these scholars with the additional item in Section A. This item is used only upon a scholar's entry into the grant supported training and are not reported annually.

Second, grantees funded under the Leadership Priority (325D) have requested an additional item to track the number of credit hours scholars had earned prior to enrollment that were accepted toward program completion (This affects approximately 12% of scholars.). Grantees and OSEP believe this variable may be a factor in whether scholars complete training programs prior to a grant's end date.

Third, grantees reported to OSEP that the current instrument did not allow them to indicate that a scholar would complete his/her degree/certificate/endorsement after the grant ended. The system can only track active grants, and the additional item in Section E will allow grantees to indicate that a scholar will complete or has completed the program after the grant ended. This item will only be answered if the grantee indicates that the scholar exited prior to completion because the grant ended. Annually, between 300 and 350 scholars (or 4% of scholars) do not complete their grant programs prior to the grant end date. This item will only be used when the scholar exits the program under unique circumstances.

16. Plans for tabulation and publication

A final report will be produced for each fiscal year. This report will include descriptive analyses of all variables collected. The number of students and percentages, as well as measures of central tendency when appropriate, will be presented by grant type in table format. Bulleted text and an executive summary will be provided to highlight key findings. The final report will also include analyses of relationships among variables in the current fiscal year data set as well as comparative analyses of key variables across all data sets.

In addition, analyses will be conducted to generate the statistics required for reporting the program performance measures. These program performance measures by grantee will also be made publicly available. OSEP will also present findings at its annual Project Director's Meeting. The table below summarizes the data collection and reporting timeline. Each data collection period runs from September through August.

Task	Month(s)
Prepare system for data collection	September-December



Notify grantees when data collection begins	January
Grantees enter data	February-March
Data cleaning	April-May
Draft reports	June-July
Presentation at Project Director's Meeting	July
GPRA reporting	July-August
Final report	August

17. Display of OMB expiration date.

This item is not applicable as the OMB expiration date will be displayed on the form.

18. Exceptions to the certification statement.

There are no exceptions to the certification statement.