

California Department of Education
1430 N St.
Sacramento, CA 95814-5901

December 22, 2010

Dear Sonya Edwards,

Thank you for the California Department of Education's response to the proposed data collection for the *Equitable Distribution of Effective Teachers: State and Local Responses to Federal Initiatives (EDET)* study, as published in the Federal Register, Volume 75, No. 213 on November 4, 2010. We are pleased to be able to take this opportunity to address your concerns. For each comment, we summarize the comment and provide our response.

1. **Reviewer comment:** California does not currently have data to complete the State Data Request file and the burden estimate for the data request is insufficient.

Response: States will not be asked to collect any new data or analyze data in a new way to complete the data request. The data request provides states with the option to indicate that a particular measure is not collected in their state. As states are not requested to collect new data, nor to analyze data in new ways, we believe that the time required for the data request is sufficient.

2. **Reviewer comment:** California believes the burden is underestimated because the estimate assumes that only one person from each state or LEA will be responding.

Response: In the case of more than one respondent, the interview questions and interview time would be split among respondents as appropriate. This is explained in Part A, Section 12, as follows:

Note that the unit of analysis in the tabulations below is the entity—SEA or LEA. The study anticipates that the largest entities will divide the interview content between multiple individuals, as explained below in Part B under *Data Collection Procedures*.

Further detail is provided in Part B, Section 2:

The interviews with the primary respondent and any additional respondents for each state or LEA will cover all of the evaluation questions and last approximately 105 minutes, divided among the respondents within each entity.

It is not the intention of this study to ask the same question of more than one respondent. States and large LEAs will be provided with a detailed explanation of the topics covered in the interview so that they can direct the study team to the appropriate respondent for each section.

3. **Reviewer comment:** California believes the burden is underestimated because the estimate does not include an estimate of time for follow-up questions.

Response: The burden estimate should include time for follow-up. We have added 15 minutes to the burden estimate for follow-up communication.

4. **Reviewer comment:** California believes the burden is underestimated because the estimate does not include time for the state or LEAs to review the draft report when it is published for public review and comment.

Response: Consistent with prior practice, report drafts will not be made available for public comment.

Thank you again for providing these comments on the OMB package, and please feel free to contact me if I can respond to any further concerns.

Sincerely,