Appendix F

Replies to public comments on "Integrated Evaluation of ARRA" baseline package (questions are included verbatim in black font and IES responses appear below in purple font)

The State of California respectfully submits the following comments solicited by ED related to Integrated Evaluation of ARRA Funding, Implementation and Outcomes (04413):

Due to recent cuts, some LEAs have chosen to reduced office and administrative staff to help protect at least some instructional positions that otherwise would have been eliminated. LEAs are already stretched to complete the reporting that is statutorily required. This evaluation, which is not statutorily required, will just compound the reporting burden placed on the LEAs.

- We understand and appreciate the number of reporting requirements LEAs face. Where possible, this study will rely on extant data and will not be duplicative in requesting information concerning topics where reliable data are already available. In addition we have revised all three surveys (state, district, and school) to eliminate any items not necessary and in turn have reduced burden to some degree.

Although the survey requests estimates of expenditures, simply trying to "estimate" expenditure amounts may not be reliable nor entirely possible, yet providing actual data will be very time consuming. Given the multiple components of the expenditure estimates at both the state and local levels, the information most likely will not be readily available from one source and therefore may require using multiple resources to provide the estimates. Identifying the necessary resources, identifying the correct information and compiling the information to provide a response will exceed the 75 minutes estimated for SEAs and the 45 minutes estimated for LEAs.

- Questions concerning expenditures and specific uses of ARRA dollars have been streamlined. However, it should be noted that 45 minutes was the burden estimate for the school survey and that 75minutes have been allotted for the LEA survey. Also, please note that multiple respondents will be sharing the burden for both SEA and LEA surveys.

In addition, at the school level, to complete the survey questions which require that the respondent check the appropriate box will take at least the entire 10 minutes allotted for the survey. To research and compile the data on the number of teachers in core academic areas, the number of school-based professional development staff and the number of assistant principals could be confusing and time consuming in a large size school, especially if the individuals perform duties in multiple areas.

- The school level survey has been simplified and shortened. However, it should be noted that 10 minutes was the burden estimate for the district poll and that 45minutes have been allotted for the school poll.