

Supporting Statement for Paperwork Reduction Act Submission

Title II Teacher Quality Accountability Reporting Forms and User Guidance authorized by the *Higher Education Act* of 1965, as amended in 2008 by the Higher Education Opportunity Act (*HEA*)

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section¹. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, make note of the sections or changed sections, if applicable.

This statement supports a revision of a currently approved information collection required by Title II of the *Higher Education Act* of 1965 as amended in 2008 by the *Higher Education Opportunity Act (HEA)*, P.L. 110-315, sections 205-208. Title II requires states and jurisdictions (for reporting purposes all entities are referred to as states) to report their criteria, for credentialing initial teachers, at state-approved traditional and alternative teacher preparation programs in institutions of higher education (IHE) and independent of IHEs that enroll students receiving federal assistance under HEA. The Office of Postsecondary Education (OPE) will collect information required by Title II from states and jurisdictions for the U.S. Department of Education (Department). The target population for this data collection consists of two groups:

- State teacher credentialing authorities, and
- Administrators of state-approved teacher preparation programs.

The law requires the Secretary of Education (Secretary) to submit an annual report on the quality of U.S. teacher preparation and rigor of state requirements for teacher credentials and assessments based on annual state, institution and program reports to the Congressional authorizing committees. The Secretary's report is based on information provided in the mandated annual collection of State Report Cards (SRC), which is, in turn, partly based on information collected by the Institution and Program Report Cards (IPRC) from IHEs' and other entities providing teacher preparation programs. The major revisions to the SRC clarify instructions, ensure item placement on the appropriate Report Card, SRC or IPRC, as in requesting states, rather than IHEs, to provide credential information and IHEs, rather than states, to provide teacher preparation program information, such as major and subject or content area information. The revisions also eliminate items whose responses were uninformative for the purposes of the Secretary's Annual Report, such as information on nonstate-approved credentials, placeholder activities, and descriptions and criteria for inactive and phased-out programs.

¹ Please limit pasted text to no longer than 3 paragraphs.

This statement supports clearance specifically for two Title II Report Cards, SRC and IPRC, and the User Manuals for each that guide respondents to enter information into the electronic system supporting data entry on the Report Cards.

OMB approval is requested on a regular schedule.

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.

The Department uses the information collected in the Report Cards submitted from states to prepare a mandated annual report on the nation's teacher quality from the Secretary to the Congressional authorizing committees. Previous reports are available on the Department's website at <http://www2.ed.gov/about/reports/annual/teachprep/index.html>

The information collected on the performance of teacher preparation programs in every state since the first collection in 2001-02 is maintained in OPE's system at <http://title2.ed.gov/default.asp>. The Web site recent and longitudinal data is available to the public at any time, and provides the Administration with information to use in The Secretary's Report to Congress. The site is also accessed for information to inform Department policy, develop initiatives on teacher quality and preparation, and provide data resource for associated teacher development topics.

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.

All states report electronically to OPE's web-based system where the SRC is posted at <https://title2.ed.gov/srsomb>. To minimize the burden on respondents, OPE prepopulates Title II Report Cards with reported data wherever possible, and provides efficient item entry formats and edit checks. Report Cards, as e-report forms, expedite electronic reporting by using radio buttons to save, exit, reset in various conditions, text boxes, check boxes, an edit list option for assistance with numerous data points reported in lists, real-time edit checks and spell-check. States are required by *HEA* to report teacher preparation program participants' pass rates on the SRC, which most states expedite by using testing companies to calculate their pass rates, and a few states themselves calculate the teacher test pass rates.

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 information collected does not duplicate any other information collection effort in the Department. No other agency systematically collects state and program information on teacher preparation, teacher preparation program evaluation, teacher credentialing, teacher assessment or

states' pass rates in the same broad manner for a Congressional and national audience. The information is not available in other forms or as the result of other information collections.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.

Small businesses or other small entities are not part of the target population of the information 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.

Title II of *HEA* mandates this annual data collection. The Secretary as well as the states, institutions and programs required to report would be out of compliance with the statute if the information were not collected annually and reported in a timely manner.

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 than 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.**

There are no special circumstances that would require this information collection to be conducted in any of the ways listed as part of this question.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

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.

A 60 day and 30 day notice about this data collection was published in the Federal Register to allow public comment. Three 60 day public comments were received. One comments was in regard to the collection schedule, one was irrelevant to this collection and one was a misunderstanding about an element on the IPRC, which was explained to the commentor in the response. No changes were made to the report cards, State Report Card (SRC) and Institution and Program Report Card (IPRC) based on the public comment.

9. Explain any decision to provide any payment or gift to respondents other than remuneration of contractors or grantees.

No payment or gift will be provided to respondents in connection with this data collection.

10. Describe any assurance of confidentiality provided to respondents.

The information being requested through these Report Cards is required, not voluntary. Much of the required information is public information, since teacher credential requirements are a matter of public record in all states and jurisdictions. The production and verification of pass rates, which involve personally identifiable data, will be handled in accordance with all applicable state and federal laws, including privacy laws. In accordance with *HEA*, pass rates on tests taken by fewer than 10 examinees will not be reported. Individually identifiable data will also be handled in accordance with all relevant laws, including privacy laws.

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. The justification should include the reasons 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 data collection includes no questions of a sensitive nature. The information items in the state and institutional reports are not of a sensitive nature, and respondents should feel comfortable answering any of the questions.

12. Provide estimates of the hour burden of the collection of information.

This information collection is required to respond to a statutory mandate from Congress contained in Title II of the *Higher Education Act* of 1965, as amended in 2008 by the *Higher Education Opportunity Act (HEA)*.

Annual burden hours for state respondents on the State Report Card (SRC): 250 hours

This request for a program change reduces burden from the current inventory of 910 to 250 hours for states to report on the SRC for each institution and teacher preparation program they report by 38,922 hours. The respondents for State Report Card (SRC) are 59 U.S. states and jurisdictions, reporting annually. This decrease in burden is due to streamlining the SRC. The edited SRC will continue to collect in the aggregate at the institution or entity level on number of participants served in traditional and alternative route teacher preparation programs and by program for nonIHE-based alternative routes at the program level.

The estimated mean cost per hour of state staff assigned to this task is approximately \$31.00, according to the Bureau of Labor Statistics (BLS) at <http://www.bls.gov>, for an estimated total cost of \$7,750.00 for a state to complete and submit the SRC.

Annual burden hours for IHE and Teacher Preparation Program respondents on the Institution and Program Report Card (IPRC): 146 hours

This request increases IPRC burden due to population growth by 69,047 hours. There are 1,502 IHEs providing traditional and/or alternative route teacher preparation programs leading to state teaching credentials from within IHEs reporting on the IPRC. Additionally, there are approximately 219 teacher preparation programs outside of IHEs also reporting on the IPRC, which must report. In total there are currently 1,721 respondents due to population growth, making this an adjustment.

Collectively, the Department estimates that 146 hours per IHE or nonIHE-based teacher preparation program respondent will be required to assemble, check, and report on the IPRC for traditional or alternative route teacher preparation programs to state authorities. In total, the burden remains the same at 251,266 hours.

We estimate the mean cost per hour for IHE or program staff on average to prepare an IPRC is \$26.00, based on BLS sources, <http://www.bls.gov>, for an estimated total cost of \$3,796.00 for

an IHE or nonIHE-based teacher preparation program to complete and submit an IPRC for a traditional or alternative route teacher preparation program.

The total annual cost burden to respondents resulting from the information collection follows:

Total cost burden to states for an annual SRC report is estimated at \$457,250.00.

Total cost burden for annual IPRC reports is estimated at \$6,532,916.00.

Total cost burden for all respondents on the public is estimated at \$6,990,166.00.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

The total for the capital and start-up cost components for the information collection is 0. This collection will not require the purchase of any capital equipment and will not create any start-up costs.

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 annualized cost to the Federal government will be approximately \$850,000. This includes the equivalent of one senior officer staff time, a contract officers' representative (COR) and the cost of employing a contractor to refine and maintain the data collection Report Cards, collect, tabulate and analyze the data, support the Title II Web site for perpetual access, and prepare drafts of the Secretary's annual report on the quality of teacher preparation programs and state requirements for teacher credential based on the data collection findings. Additionally, the contractor provides technical assistance to 59 states, approximately 1,500 institutions and 300 nonIHE-based teacher preparation programs for implementation and maintenance of the electronic reporting system and the collection of accurate and complete data annually.

15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).

The State Report Card (SRC) decreases burden by 38,992 hours due to streamlining and eliminating SRC elements and is a program change. This is a difference of 30,055 hours from the previous burden hours.

On the IPRC, the burden increases by 69,047 hours due to population growth. The respondents increase from 1,309 to 1,780. This increase is out of the agency's control.

The overall growth results in a total burden increase of 30,055 and an increase in respondents of 471.

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.

The Secretary of Education will submit an annual report to the Congress each year through the Title II program in OPE. The Secretary's Report is based on information in the state Report Cards, which are due to OPE each year. Teacher preparation programs, within or independent of IHEs, submit their Institution or Program Report Card to state authorities annually for use by states in preparing their Report Cards to OPE. OPE prepares and analyzes states' information for presentation in the Secretary's Report to Congress, which is produced at the end of the year. There are no complex analytical techniques applied to the data. The report is a descriptive presentation. OPE publishes all Title II Reports on the web site at <https://title2.ed.gov/default.asp>.

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.

OPE will display the expiration date for OMB approval of the information collection on the first page of the annual SRC, the annual IPRC and the User Manuals.

18. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.

There are no exceptions to the statement.