

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

Survey on the Use of Funds Under Title II, Part A (SEA Uses of Funds)

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.

The reauthorized Elementary and Secondary Education Act (ESEA) places a major emphasis on teacher quality as a significant factor in improving student achievement. Under ESEA, Title II, Part A provides funds to states (SEAs) and school districts (LEAs) to conduct a variety of teacher-related reform activities. ESEA funds can be used for a variety of teacher quality activities in any subject area. Although the majority of funds are provided to LEAs, allowable SEA uses of funds include:

- *Reforming teacher and principal certification (including recertification) and licensure to ensure that teachers have the necessary subject-matter knowledge and teaching skills in the subjects they teach, that requirements are aligned with challenging state academic content standards, and that principals possess the instructional leadership skills to help teachers teach and students learn;*
- *Providing support to teachers and principals through programs such as teacher mentoring, team teaching, reduced class schedules, intensive professional development, and using standards or assessments to guide beginning teachers;*
- *Carrying out programs to establish, expand, or improve alternative routes for state certification for teachers and principals (especially in mathematics and science) that will encourage highly qualified individuals with at least a baccalaureate degree, including mid-career professionals, military personnel, paraprofessionals, and recent college graduates with records of academic distinction, to enter into the teaching profession;*
- *Developing and implementing effective mechanisms that help LEAs and schools recruit and retain highly qualified teachers, principals, and pupil services personnel; and*
- *Reforming tenure systems, implementing teacher testing for subject-matter knowledge, and implementing teacher testing for state certification or licensure, consistent with Title II of the Higher Education Act (HEA).*

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

Previously, the U.S. Department of Education (the Department) has conducted an LEA survey to better understand how LEAs use their Title II, Part A funds. This SEA survey will help the Department better understand how SEAs use their allocated Title II, Part A funds. In addition, with ESEA Flexibility Waivers requiring states to commit to adopting college- and career-ready standards and assessments and new educator evaluation systems, this survey will provide insight into whether states are now using Title II, Part A funds to support ESEA Flexibility goals. States also have to commit to new accountability systems; however, this survey will only examine if Title II, Part A funds will support Principle 1 and 3 of ESEA Flexibility Waivers.

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 will collect information annually through 52 short SEA surveys. The information will be used by the Department to evaluate and describe the implementation of the Title II, Part A program at the SEA level and uses of Title II, Part A funds by SEAs, similar to previous surveys of LEAs (see <http://www.ed.gov/programs/teacherqual/resources.html>). The Department will report the results of this study to Congress and the public, and present the findings to state Title II, Part A coordinators during their annual meeting. See the attachment for a copy of the proposed data collection instrument for the 2012-13 survey.

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 given to using technology to reduce burden.

The Department, through its contractor, will ask respondents to complete a pre-printed survey form and submit the completed form either by mail or by fax. Developing a web-based data collection system would not be cost-effective for a study of this size. If requested, the contractor will provide respondents with an electronic Microsoft Word version of the data collection form.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Although the Department has collected similar data from LEAs, no previous data have been collected on SEA uses of Title II, Part A funds. This survey allows the Department to answer questions related to and describe how SEAs use Title II, Part A funds to implement the Title II, Part A program.

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.

This data collection does not impact small businesses or other small entities. Respondents for this data collection are SEAs.

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.

The Department has extensively used findings from previous Title II, Part A data collections at the LEA level to evaluate the implementation of the Title II, Part A program. The data have been used inform the Department's performance indicators for GPRA and annual budget deliberations in Congress. The new data collection at the SEA level would provide policymakers with the only source of data on how SEAs use their Title II, Part A funds. There are no technical or legal obstacles to reducing burden.

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;

Not applicable – this is an annual collection.

- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

Respondents will have more than 30 days to prepare a response.

- requiring respondents to submit more than an original and two copies of any document;

Respondents will only need to submit the original completed survey.

- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

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Respondents will not be required to retain records related to this data collection.

- 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;

Not applicable to this data collection.

- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

Not applicable to this data collection.

- 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 that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

This data collection does not include a pledge of confidentiality.

- 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.

Not required under this data collection.

8. As applicable, state that the Department has published the 60 and 30 Federal Register notices as 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.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The Department published a 60- and 30-day Federal Register notice with no public comments.

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

No payments or gifts will be made.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that

authorizes the pledge of confidentiality should be provided.² If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data.

The Department makes no pledge about the confidentiality of the data.

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.

No questions are of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in item 12. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent types, IC activity, Respondent and Responses, Hours/Response, and Total Hours)
- Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.

² Requests for this information are in accordance with the following ED and OMB policies: Privacy Act of 1974, OMB Circular A-108 – Privacy Act Implementation – Guidelines and Responsibilities, OMB Circular A-130 Appendix I – Federal Agency Responsibilities for Maintaining Records About Individuals, OMB M-03-22 – OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, OMB M-06-15 – Safeguarding Personally Identifiable Information, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information)

This survey will be administered to SEAs in the 50 states, the District of Columbia, and Puerto Rico, totaling 52 respondents. We estimate that the survey will take an average of 5 hours to complete for a total of 260 annual burden hours. The cost to respondents is estimated to be \$27 per hour, resulting in a total cost to respondents of approximately \$7,020 for the 2012-13 data collection. Westat, the contractor that will process the survey, has estimated this hourly rate based on previous experience with similar data collections. The estimated completion time for the survey is based on experience with the LEA survey administered in previous years.

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 cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12

Total Annualized Capital/Startup Cost :
 Total Annual Costs (O&M) :
 Total Annualized Costs Requested : _____

There are no costs that (a) meet the criteria for inclusion under this item, and (b) have not been addressed in either item #12 or #14.

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 Department estimates the annualized cost to the federal government to be \$47,654 which represents the budgeted cost for Westat to conduct the study. The cost breakdown across the major tasks for the survey are as follows:

- *Survey development/preparation: \$10,636 (104 hours)*
- *Data collection and entry: \$12,141 (152 hours plus supplies, postage, and server costs hours)*
- *Data analysis and reporting: \$ 11,352 (112 hours)*

Westat has estimated these figures based on previous experience with the LEA survey. In addition, there will be a one-time cost of \$13,525 (120 hours) to develop the data entry system for the survey.

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).

This is a new data collection; no changes.

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 Department anticipates that the results from this study will be published in issue briefs similar to those published for LEAs (currently available on the Department's website at <http://www2.ed.gov/programs/teacherqual/finalfindings32312.pdf>). No complex analytical techniques will be used. The data obtained through this survey will also be incorporated into congressional briefings, the Department's GPRA indicators, and presentations to state Title II, Part A coordinators.

In the first year of data collection, the survey will be administered in September 2013. SEAs will be asked to respond by October 2013. Data cleaning and analysis will occur between October and November 2013, and the issue brief will be published on the Department's website by December 2013. In subsequent years, the survey will be administered in December with a request for response in February (completed surveys accepted through March). Data cleaning and analysis will occur in April and May, with the final brief published on the Department's website by July.

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.

No request is being made to not display the expiration date for OMB approval of the information collection.

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

No exceptions to the certification statement.