SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

Survey on Use of Funds Under Title II, Part A

A. JUSTIFICATION

1. Importance of the Information

The reauthorized Elementary and Secondary Education Act (ESEA), places a major emphasis on teacher quality as a significant factor in improving student achievement. Under the ESEA, Title II, Part A (Teacher Quality) provides funds to State educational agencies (SEAs) and local educational agencies (LEAs) to conduct a variety of teacher-related reform activities.[1] Unlike previous authorizations of Title II, which provided funds primarily for professional development in mathematics and science, under ESEA funds can be used for a variety of teacher quality activities in any subject area. For LEAs, which receive the majority of these funds, allowable uses of funds include:

- Recruiting highly qualified teachers.
- Providing financial incentives for teachers in high-need areas.
- Offering professional development in core academic areas.
- Retaining teachers through mentoring, induction and other support services.
- Reforming tenure.
- Providing merit pay to teachers.
- Testing teachers in academic areas.
- Carrying out programs that emphasize multiple career paths for teachers.
- Reducing class size.

To gain a better understanding of how LEAs were responding to the high level of Title II, Part A funding and the wide range of teacher quality reforms allowed under the ESEA, the U.S. Department of Education (the Department) collected baseline data in 2002-03 from LEAs around the nation to answer the question: “How did districts report spending their federal Teacher Quality funds in 2002-03?”

In addition to providing information on how LEAs use Title II, Part A funds, the Department has used this survey to collect information on the provision of high-quality professional development in LEAs. These data on professional development satisfy Section 1119 (a)(2)(B) of the ESEA, which requires that States make annual increases in this percentage. Initially, the Department collected these data through the Consolidated State Performance Report (CSPR), but poor data quality in this collection lead the Department to collect the data directly from LEAs rather than from the State.

Results from previous year surveys can be found at http://www.ed.gov/programs/teacherqual/resources.html.

This OMB clearance request is to continue these analyses using a similar data collection instrument and sampling plan for the 2014-15 school year and subsequent years. The proposed changes to the LEA survey are minor and address requests for more specific information on the uses of Title II, Part A funds. No changes to the SEA survey are required.

Please see Appendix D for a more detailed account of proposed changes to the survey instrument.

2. Purposes and Uses of the Data

The information will be collected annually from a nationally representative sample of 800 LEAs, plus approximately 50 short SEA surveys. The information obtained will be used by the Department to evaluate and describe the implementation of the Title II, Part A program and the provision of high-quality professional development to teachers.

[1] The Title II, Part A program replaced two existing programs within the Office of Elementary and Secondary Education: the Eisenhower Professional Development and the Class-Size Reduction programs. Eisenhower program activities focused mostly on professional development in mathematics and science. The Class-Size Reduction program was primarily designed to reduce the class size of students in grades K through 3.

The results of this study will be compared with similar results obtained under previous OMB clearances for school years 2002-03 through 2013-14 and reported to Congress and to the public (see http://www.ed.gov/programs/teacherqual/resources.html). Study results have also been presented to state Title II, Part A coordinators during their annual meeting. See Appendices A and B for a copy of the proposed data collection instruments for the 2014-15 survey.

3. Improved Information Technology

Respondents will be asked to complete and submit pre-printed data collection forms either by mail or by fax. In order to minimize reporting burden, the data collection forms that are provided to the sampled LEAs will be printed with all available district-level information from NCES' Common Core of Data (CCD) and with financial data obtained from the SEA surveys. The use of pre-printed forms reduces burden on the respondents and enhances data accuracy as the forms are submitted. . Upon request, the electronic Microsoft Word version of the data collection forms can be provided to respondents, and they will be able to submit those by e-mail. Starting with the 2014-15 data collection, districts will also be offered the option to submit the requested data via an online data collection system.

4. Efforts to Identify Duplication

The information requested in the Survey on the Use of Funds Under Title II, Part A is not currently collected and is not available in other forms. This data collection effort is part of a planned, ongoing data collection to describe the nature of the Title II, Part A program as it is implemented at the LEA level and to provide information on the provision of professional development to teachers. By doing this survey using a nationally representative sample of 800 LEAs, the Department has been able to eliminate several similar questions from the consolidated reporting form.

5. Methods Used to Minimize Burden on Small Entities

Small businesses or other small entities are not affected by this program. All respondents for this data collection are SEAs and LEAs.

6. Consequences of Not Collecting the Information

The information obtained as a result of the previous Title II, Part A data collections has been used extensively to evaluate the implementation of the Title II, Part A program. It has been particularly instructive to examine the program as it evolved from its predecessor, the Class Size Reduction program, which had very specific goals compared with the more general Title II, Part A program. It is critical that this data collection be continued on an annual basis to monitor program implementation. Specifically, the information collected for this program will be used both to inform the Department's performance indicators for GPRA and to inform the annual budget deliberations in the Congress. Not collecting this Title II, Part A data on an annual basis would remove from policymakers the only data currently available regarding this program. 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 after receipt to prepare a response.

Requiring respondents to submit more than an original and two copies of any document:
Respondents will submit only an original.

Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years:
Respondents will not be required to retain records specifically 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:

This is not applicable to this collection of information.

Requiring the use of a statistical data classification that has not been reviewed and approved by OMB:

This information collection does not require 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:

This collection does not include such a pledge of confidentiality.

Requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

This collection does not require respondents to submit proprietary trade secrets.

8. Consultations Outside the Agency

For the original Title II, Part A study, the Department consulted with several SEAs and LEAs to determine the feasibility of the data collection. Additionally, we conducted a pilot test of the revised 2004-05 data collection instrument with five LEAs. In selecting the LEAs to participate in the pilot test, we sought to include LEAs of varying size and location. The purpose of the test was to (1) verify that LEAs will be able to provide information for all of the data items on the data collection instrument and (2) ensure that the burden estimates used in this clearance package are accurate. As a result of this effort, we made several revisions to the wording on the data collection instrument and determined that we had somewhat underestimated the respondent burden. This OMB clearance request has been modified to accommodate the changes made to the LEA survey for the 2014-15 data collection.

Westat, the contractor that will process the survey, has provided technical assistance to SEAs and LEAs completing this information collection in the past. Based on discussions with many of the SEAs and LEAs completing these surveys in previous years, Westat provided suggestions to the Department for changes to the LEA survey that will reduce burden on the respondents.

We will publish a 60/30-day Federal Register notification to solicit public comment, as required by 5 CFR 1320.8(d). We will summarize public comments received, and respond to them response to these comments, particularly any comments on cost and hour burden. ED received two public comments, response to these comments are attached.

9. Payments or Gifts to Respondents

No payment or gifts to respondents will be made.

10. Assurance of Confidentiality

There is no assurance of confidentiality.

11. Sensitive Questions

There are no questions of a sensitive nature.

12. Estimated Response Burden

Annually, a sample of 800 LEAs will be asked to complete the data collection instrument. We estimate that the LEA survey will take an average of 6 hours to complete. The cost to respondents is estimated to be $31 per hour for a total cost to respondents of approximately $148,800 for the 2014-15 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 2014-15 data collection instrument is based on experience with the 2002-03 Title II, Part A data collection and on subsequent years of the same collection.

Through our pilot test, we determined that the amount of time needed to complete the form varied substantially from one LEA to the next. For some LEAs, the time needed to complete the forms would be minimal, whereas others will need to devote significant resources to compiling the requested information. The proposed burden estimate of 6 hours per respondent represents what we believe will be the average burden across all LEAs in the sample.

We estimate that the burden for the SEA survey will be 1 hour per respondent, for a total of 50 hours. The cost to respondents is estimated to be $31 per hour for a total cost to respondents of approximately $1,550 for the 2014-15 data collection. Westat, the contractor that will process the survey, has estimated these figures, based on previous experience with similar data collections.

The total estimated burden for both the SEA and LEA survey is 4,850 hours at a cost of $150,350.

13. Estimates of Cost Burden for Collecting Information

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. Estimated Annualized Cost to the Federal Government

The annualized cost to the federal government for the first year of the web-based survey application is estimated to be $60,000. The $60,000 represents the budgeted cost for our contractor, Westat to conduct this study.

The cost break-down across the major tasks for the SEA and LEA surveys are as follows:

One-time cost for web-based survey application -- $15,000 (150 hours)
Survey development/preparation and sampling -- $12,000 (120 hours)
Data collection and entry -- $9,000 (90 hours)
Data analysis and reporting -- $24,000 (240 hours)

In the following years, the annualized cost is estimated to be $45,000.

Westat, the contractor that will process the survey, has estimated these figures, based on previous experience with this data collection. Westat already has the data systems in place to collect and analyze these data.

15. Explain the reasons for any program changes or adjustments reported in Item 16 of IC Data Part 1.

There is a program change increase of 250 hours due to the additions of requests for data in Question 4, and the additions of Questions 5 and 6 to the LEA survey; and a program change reduction of -150 hours due to reducing the number or hours to complete the SEA survey.

16. Tabulation and Analysis Plan and Schedule

We anticipate that the results of this study will be published in an issue brief similar to the 2012-13 results currently available on the ED website (http://www2.ed.gov/programs/teacherqual/2013findingsfinal.doc). No complex analytical techniques will be used. In addition, the data obtained through this data collection will be incorporated into congressional briefings, as well as the Department's GPRA indicators and presentations to state Title II, Part A coordinators.

We anticipate using the same schedule as for previous cycles of this information collection. The data collection will begin in November of each year with the selection of the LEA sample and the survey of the SEAs. We will request a response from SEAs by December. The LEA survey will be sent to the LEAs in December of each year with a request for a response in February (completed surveys will be accepted through March). Data cleaning and analysis will occur in April and May. The issue brief will be published on the ED website no later than July.

17. Display Expiration Date for OMB Approval

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

18. Exceptions to Certification Statement

There are no exceptions to the referenced certification statement.