Race to the Top Annual Performance Report:

SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

A. Justification

A.1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The American Recovery and Reinvestment Act of 2009 (ARRA) provided $4.3 billion for the Race to the Top Fund (referred to in the statute as the State Incentive Grant Fund), of which approximately $4 billion was used to fund comprehensive statewide reform grants under the Race to the Top program. The U.S. Department of Education (Department) awarded Race to the Top grants in two phases. On March 29, 2010, at the conclusion of Phase 1, the Department announced Race to the Top grants for two states. Delaware and Tennessee received their grant awards on June 14 and July 28 respectively. On August 24, 2010, at the conclusion of Phase 2, the Department announced Race to the Top grants to an additional 9 states and the District of Columbia. All Phase 2 grants were awarded on September 24, 2010. Additionally, through the Department of Defense and Full-Year Continuing Appropriations Act, 2011 (FY 2011 Appropriations Act), the Department made a total of $200 million in grants to seven additional States in Phase 3 to invest in a portion of their plans from the Phase 2 competition. The Department is committed to supporting grantees as they implement ambitious reform agendas through Race to the Top. Specifically, the Implementation and Support Unit (ISU) at the Department is dedicated to differentiating its approach to supporting grantees based on individual State needs, as well as supporting States to work with each other and with experts from around the nation to achieve and sustain educational reforms.

In order to fulfill our responsibilities for programmatic oversight and public reporting, the Department has developed a Race to the Top Annual Performance Report (APR) that is tied directly to the Race to the Top selection criteria and priorities previously established and published in the Federal Register. The report is grounded in the key performance targets included in grantees' approved Race to the Top plans. Grantees will be required to report on their progress in the four reform areas (standards and assessments, data systems to support instruction, great teachers and leaders, and turning around the lowest-achieving schools) and in Science, Technology, Engineering, and Mathematics (STEM). This reporting includes narrative sections on progress and key performance indicators. As was the case in the completion of the Race to the Top applications, grantees will coordinate with LEAs to collect and report on school and district-level data elements.

This is a reinstatement without change of a previously approved collection. We received emergency clearance for this collection previously and are now seeking regular clearance. Additionally, we are adding seven additional States that received grants during Phase 3 of the competition; these States will complete a sub-set of the collection tool based on their approved plans.

Each grantee State will submit a Race to the Top APR on an annual basis. The first report for the 12 Phase 1 and 2 States was collected during August and September of 2011. Based on State feedback, the Department plans to continue to collect data during mid-August to mid-September to cover the period from the prior school year (e.g., the Year 2 APR will contain data from July 1, 2011, through June 30, 2012). States will submit the narrative elements and quantitative measures via an online data collection platform that will then be converted in to a transparent public display. For an example of the Year 1 display, please see www.rtt-apr.us.

Grantee responses will provide the information required for the Department to fulfill its programmatic and fiscal oversight responsibilities. We have created a comprehensive monitoring (programmatic review and evaluation) protocol that utilizes data from the Race to the Top APR. In particular, the data will help to inform customized technical assistance for grantees. We will also incorporate the data from monitoring and the APR into State-specific and comprehensive reports that will inform the public and Congress about Race to the Top.

The questions included in the APR relate to the grant administration/performance and are covered by the ARRA and Education Department General Administrative Regulations (EDGAR) provisions. Section 14008 of the ARRA requires the Department to collect State reports annually in a reasonable manner as determined by the Department. Additionally, 34 CFR 80.20 requires that a State must account for grant funds in accordance with State laws and procedures. It also requires that a State's fiscal control and accounting procedures, as well those of its subgrantees and contractors, must, among other things, be sufficient to permit the tracing of expenditures of funds to a level that ensures that funds have not been used in violation of applicable Federal requirements. Similarly 34 CFR 80.40 requires that grantees are responsible for managing the day-to-day activities of grants and subgrants to assure compliance with Federal requirements and that performance goals are being achieved. In the Race to the Top application the Department asked grantees to create annual targets for performance measures and noted that additional measures may be added in the future.

A.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 information collected will be in the form of an annual report on progress and key performance indicators reported by grantee States.

The Department will use information collected through the APR to assess the progress of Race to the Top grantees in implementation toward the targets outlined in their approved plans and to ensure compliance with statutory and Department fiscal regulations.

In Year 1, the Department used the APR data in the annual reports (see http://www2.ed.gov/programs/racetothetop/performance.html). Additionally, all State-reported quantitative and qualitative data was made public and transparent on www.rtt-apr.us. As of April 5, 2012, the site had 3,854 visits with 2,846 unique visitors.

The Department is in the process of expanding www.rtt-apr.us to display both annual reports and progress across multiple years on several metrics (this additional display will be based on the annually reported information; it will not require any additional reporting by grantees).

A.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.

The Department enlisted the services of a contractor to develop an electronic system to facilitate the collection of APR data from States. The system will reduce burden to grantees by prompting States to complete the sections required based on their approved plans. For example, when a Phase 3 State logs in to complete its report, the system will direct the State specifically to complete only those elements that are required based on the State's approved plan, will skip those sections that are not relevant, and will indicate when additional reporting is optional.

The Race to the Top Annual Report questions will be emailed to grantees, discussed on a webinar, and posted on the Department's website.

A.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 assurances and information requested under this collection are unique to each year of the Race to the Top program, and the Department has not collected them in the past. Even in the event of similar or comparable information collected for other programs in the past, the progress updates and performance measures are specific to the Race to the Top program and the information is specific to the present point in time. Therefore, any comparable information and assurances that were collected in the past would not satisfy the requirements for this program.

The Department has made every effort to reduce the burden on States in providing the information. Some data are prepopulated in the system to reflect prior reporting (e.g.,

[Prepopulated Y1]), to reduce grantee burden and utilize records already on file with the Department (e.g., [Prepopulated DR]), and to leverage existing Department data collections (e.g., [CCD data, SY 11-12]). We will compile student performance information, including ESEA data from the prior year, NAEP data, and high school graduation rates, from the National Center for Education Statistics (NCES) Common Core of Data (CCD), the Consolidated State Performance Report (CSPR) and EDFacts. We will also receive the number of K-12 students and students in poverty from CCD and pre-populate the APR with those data.

A.5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The eligible applicants for the Race to the Top program are State governors. No small businesses or entities will be directly impacted by this collection. In order to reduce the burden on local educational agencies (LEAs), the Department has made every effort to ensure that the required collection is absolutely necessary to meet the requirements of the program. Additionally, States and LEAs were informed through the application process of the need to collect data on the performance measures included in their approved Race to the Top plans.

A.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.

Race to the Top is the largest discretionary grant program ever administered by the Department, and continues to generate a high level of public interest. This collection is critical to ensure the Department has the required information to inform ongoing performance management discussions with grantees in order to make the necessary and immediate adjustments to program implementation and support, as well as provide appropriate and timely updates to the public on the progress of grantees' program implementation and achievement of targeted outcomes.

A.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.*

The Department is committed to supporting States as they implement ambitious reform agendas through Race to the Top. Specifically, the ISU is differentiating its approach to supporting grantees based on individual State needs and tailored technical assistance that supports States to work with each other and with experts from around the nation to achieve and sustain educational reforms. Thus, ongoing communication with the Department is necessary to provide appropriate and timely assistance to States as they implement their Race to the Top plans. Additionally, regular submission of progress updates will reduce the burden on the State when preparing for the onsite program review and meetings with ISU leadership.

This collection is consistent with 5 CFR 1320.5(d)(2).

A.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.

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 public has previously had an opportunity to comment during the emergency clearance period, and the APR was updated at that time to reflect public comment. Additionally, wording adjustments and additional clarity in instructions were added based on grantee feedback during the Year 1 emergency collection. Note too that the questions in the APR are closely tied to the Race to the Top selection criteria and absolute, competitive, and invitational priorities previously established through the notice and

comment rulemaking and published in the Federal Register, as well as the statutory criteria, so it is unlikely there will be significant public comment. Still, the public will also have an opportunity to comment during the regular public comment period notice, and a response summary will be provided for those comments.

The notice of proposed information collection for the Race to the Top APR was published in the Federal Register on April 26, 2012 (77 FR 24933). During the 60-day public comment period, which ended on June 25, 2012, no comments were received on this collection.

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

No payments or gifts to respondents have been made.

A.10. *Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.*

There is no assurance of confidentiality.

A.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.*

There are no questions of a sensitive nature.

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

A. Burden hours for respondents

Because of the difference in scope between grantees in Phases 1 and 2 (funded for their full reform plan) in comparison to Phase 3 (funded for a portion of their reform plan articulated in Phase 2 of the competition), the Department has provided estimates for each set of grantees.

The Department estimates that each Phase 1 and 2 grantee (a total of 12) will spend between 94 and 133 hours of staff time to provide the information required in each APR. This estimate is based on an average between the upper and lower levels of burden hours estimated. The lower level estimate is 94 hours, which represents the time needed to report on the required performance measures. The upper level estimate applies to grantees that have provided optional performance measures; in that case, up to 39 additional hours will be needed to complete the report.

Grantees were permitted to include optional performance measures with annual targets as part of their Race to the Top applications as a voluntary means of providing additional information on implementation and outcomes, and several States chose to do so. Additionally, States may choose to add optional measures through the Department's grant amendment process. The time required to complete the APR beyond the 94 hour estimate depends on the quantity and nature of the optional performance measures selected by the State, but we expect such reporting will require no more than 39 additional hours.

The Department estimates that each Phase 3 grantee (a total of seven) will spend between 25 and 113 hours of staff time to provide the information required in each annual report based on the elements included in the portion of their approved plan funded through Phase 3. The lower level estimate is 25 hours based on a State completing all elements required for all Phase 3 grantees (22 hours) and one additional required element (3 hours) based on its approved plan. The upper level estimate is 113 hours based on a State completing all required elements for all Phase 3 grantees (22 hours), all additional required elements based on portions included in their approved plan (up to 67 hours), and all additional optional sections at their discretion (up to 24 hours).

The total number of hours estimated to be spent nationally completing the APR would be 1,845. This calculation is based on the sum of 12 times the average range for Phases 1 and 2 grantees (113.5 hours) and 7 times the average range for Phase 3 grantees (69 hours).

A. State Success Factors	Hours (Annual) Phases 1 and 2	Hours (Annual) Phase 3
(A)(1) Articulating State's education reform agenda and LEA participation in it	1	1
(A)(2) Building strong statewide capacity to implement, scale and sustain proposed plans	0	2
(A)(3) Demonstrating significant progress in raising achievement and closing gaps	4	4
B. Standards and Assessments		
(B)(1) Developing and adopting common standards	0	0
(B)(2) Developing and implementing common, high-quality assessments	3	0
(B)(3) Supporting the transition to enhanced standards and high-quality assessments	3*	3
C. Data Systems to Support Instruction		
(C)(1) Fully implementing a statewide longitudinal data system	1	0
(C)(2) Accessing and using State data	3*	3~
(C)(3) Using data to improve instruction	3*	3~
D. Great Teachers and Leaders		
(D)(1) Providing alternative pathways for aspiring teachers and principals	5	0
(D)(2) Improving teacher and principal	18	18~

effectiveness based on performance		
(D)(3) Ensuring equitable distribution of effective teachers and principals	25	25~
(D)(4) Reporting the effectiveness of teacher and principal preparation programs	10	10~
(D)(5) Providing effective support to teachers and principals	3*	3~
E. Turning Around the Lowest-Achieving Schools		
(E)(1) Intervening in the lowest-achieving schools and LEAs	3	0
(E)(2) Turning around the lowest- achieving schools	2	2~
F. General		
(F)(1) Making education funding a priority	3	3*
(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools	3	3~
(F)(3) Demonstrating other significant reform conditions	4	4*
Absolute Priority		
Comprehensive approach to education reform	6	6
Competitive Priority		
Emphasis on Science, Technology, Engineering, and Math	4	4
Invitational Priorities		
Innovations for improving early learning outcomes	3*	3*
Expansion and adaptations of Statewide Longitudinal Data Systems	3*	3*
P-20 coordination, vertical, and horizontal alignment	3*	3*
School-level conditions for reform, innovation, and learning	3*	3*
Additional measures		
Additional optional performance measures	15*	5*
Expenditures		
Summary and project-level expenditure tables	2	2
Total annual hours minimum range	94	25
Total annual hours maximum range	133	113

*Indicates that grantees would only respond to the question(s) related to this element if they elected to provide optional performance measures for this element in their approved Race to the Top plans.

~Indicates that Phase 3 grantees would only respond to the question(s) related to this element if they elected to implement this portion of their Phase 2 plan through Phase 3. For example, of the

elements noted with an ~ Arizona's plan includes (A)(2), (B)(3), (C)(2), so only the burden totals associated with those elements would contribute to the total estimated burden; the online system will direct the State to complete those elements required based on the State's approved plan. A State may opt to complete additional sections on an optional basis (denoted with an *).

B. Cost to Respondents

The Department estimates that the per-hour cost for grantee and subgrantee employees will average $30 per person (approximately GS-12 equivalent) per hour for a total of $3,084 per grantee.

A.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 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.*

     Total Annualized Capital/Startup Cost: 0
     Total Annual Costs (O&M):   0
     _____

Total Annualized Costs Requested: 0

There are no start-up or annual costs (aside from salaries listed above) for this collection.

A.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 Federal costs do not include salaries of existing Federal staff. Costs explicated below are related solely to contractual support for the APR system maintenance. Specifically, the contractor will provide an online system for Annual Performance Report submission; provide technical assistance, as needed to grantees in using the system; conduct data quality reviews and work with grantees, as necessary; and conduct and analysis of this annual data. The contractor will submit an annual analysis of the data reported through the APR as well as cumulative progress on several metrics by State.

Contractor assistance		$405,000

A.15. Explain the reasons for any program changes or adjustments to #16f of the IC Data Part 1 Form.

This is a reinstatement without change of a previously approved request. This collection was discontinued in January 2012, therefore the inventory for this request is zero. This request reflects a program change of 1,845 hours and 19 responses based on the average upper and lower ranges explained in question A.12.A. There was an increase in the number of grantees from 12 to 19 and an additional 69 burden hours.

A.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 will report the information to Congress within six months of the deadline for the submission of State reports to the Department. Some of the information collected in this Annual Performance Report may be analyzed with monitoring (program review) data, ARRA 1512 reporting, and other Department data sources, and shared on a government website such as recovery.gov or ed.gov.

A.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.

There are no exceptions to the certification statement. The expiration date will be displayed on the form.

A18. Explain each exception to the certification statement identified in Item 20, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

The Department is requesting an exception to the provision certifying a reduction in burden for small entities because the provision does not apply. Additionally, the provision for certifying the use of effective and efficient statistical survey methodology does not apply to this proposed action.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection does not employ statistical methods.