

**Supporting Statement:  
Charter Schools Program (CSP) Grant Award Database**

OMB Number: 1855-0016

***PART A. JUSTIFICATION***

***A1. Circumstances Making Collection of Information Necessary***

This request is for an extension of OMB approval to collect data necessary for the *Charter Schools Program (CSP) Grant Award Database*. The CSP is authorized under Title V, Part B, Subpart 1, Sections 5201 through 5211 of the Elementary and Secondary Education Act (ESEA) of 1965, as amended by the No Child Left Behind (NCLB) Act of 2001. Under Title V, Part B, Section 5205 of the ESEA, the Secretary reserves CSP funds to carry out national activities to provide charter schools with information, to evaluate and study charter schools, and to provide other types of technical assistance.

This data collection is coordinated with the *EDFacts* Initiative (*EDFacts*) to reduce respondent burden and fully utilize data submitted by States and available to the U.S. Department of Education (ED) through the *EDFacts* database. Specifically, under the current data collection, ED collects CSP grant award information from grantees (State agencies, charter management organizations, and some schools) to create a new database of current CSP-funded charter schools and award amounts. Once complete, ED merges performance information extracted from the *EDFacts* database with the database of CSP-funded charter schools. Together, these data allow ED to monitor CSP grant performance and analyze data related to accountability for academic performance, financial integrity, and program effectiveness.

***Identifying Data Needs***

The first task in reaching the project's goals was to develop a reporting system to gather consistent and complete data on CSP grantees and on charter schools nationally. The data required by ED are:

- Detailed financial information on implementation of CSP grant activities
- Data responding to ED and CSP performance and efficiency measures

- National charter school information from other data sources, such as the Common Core of Data and *EDFacts*

ED specified several aspects of program effectiveness and efficiency that the data collection should address. They included the program information needs outlined in the January 2005 Government Accountability Office (GAO) report, program information for determining achievement of the CSP Government Performance and Results Act (GPRA) indicators, and other information to respond to the Office of Management and Budgeting (OMB) Program Assessment Rating Tool (PART).

### GAO Reports

In January 2005, GAO issued a report entitled *To Enhance Education's Monitoring and Research, More Charter School-Level Data Are Needed* which examined (1) how States allow for charter school flexibility, (2) how States promote accountability for school performance and financial integrity of charter schools, (3) the implications of NCLB for charter schools, and (4) the role ED plays in charter school accountability. In the report, GAO recommended that ED help States, which are CSP grant recipients, track Federal funds to charter schools and report the number of charter schools started with CSP funds. In addition, GAO recommended that the CSP link its own data collection with the newly developed *EDFacts* data collection (formerly Performance Based Data Management Initiative, PBDMI). The current data collection has begun the process of accomplishing these recommendations.

### OMB Review of GPRA Indicators

Congress enacted the Government Performance and Results Act (GPRA) in 1993 in an effort to reduce waste and inefficiency in Federal programs and promote accountability. GPRA called on each Federal agency to produce annual performance plans and reports beginning in 1999 that were to include quantifiable and measurable performance goals and performance indicators for the programs in each agency. For CSP, the original GPRA goal was to encourage the development of a large number of high-quality charter schools. As a result, two indicators have been used to measure the success of this goal: (1) the number of charter schools in operation around the nation and (2) the number of States with charter school legislation.

OMB, which has responsibility for approving GPRA indicators, also reviews the value of the indicators and the processes used to gather the data. ED and OMB jointly reviewed the CSP using Performance Assessment Rating Tool (PART). Following the review, the CSP office proposed three new GPRA performance indicators:

- The percentage of charter school students in grades 4 and 8 at or above proficiency in reading
- The percentage of charter school students in grades 4 and 8 at or above proficiency in mathematics
- The Federal cost per pupil in a successful charter school (with “successful” defined as a school open for three or more years)

### Additional Reports

Charter school researchers have also pointed to the need for more complete data on charter schools, primarily in the interest of policy research. For example, Lake and Hill (2005) identified areas of State and local record keeping that need improvement. Writing for the National Charter School Research Project (NCSRP), they found that data on student characteristic data such as race/ethnicity, free/reduced-price lunch, special education, and English language learners (ELL) were hard to get from State charter school offices. NCSRP also had difficulty obtaining data on how charter schools were performing within Federal and State accountability systems, including the percentage of charter schools making adequate yearly progress (AYP) and the percentage of charters labeled as low-performing. Other charter school-related data NCSRP had difficulty finding from existing sources were charter school per-pupil funding, waiting lists, parent satisfaction, and class size.

### *Data to be Collected*

Based on the information needs of ED and the recommendations of the GAO and OMB, ED created a new database of current CSP-funded charter schools and their award amounts. Funding for charter schools is provided in three ways: directly to the charter schools, through a State agency who awards grants to charter schools, and through a Charter Management Organization (CMO) that replicates and expands high-quality charter schools. Under the current data collection, ED collects data from State agencies, CMOs, and charter schools.

As of December 2014, 43 States (including the District of Columbia) have charter school legislation. Twenty of these States have active CSP grants. The CSP also provides direct grants

to 39 charter schools in 14 states that did not receive or apply for a CSP grant (CT, DE, HI, ID, IL, LA, MD, ME, NC, OH, OR, PA, UT, WA) and 22 CMOs to replicate and expand high-quality charter schools. The process for collecting data from the State agencies, CMOs, and charter schools is outlined below.

*Collect CSP Subgrant Award Information from State Agencies:* Each State agency that received a Federal CSP grant will be asked to provide the information in Exhibit 1 for the subgrants it awarded from Federal fiscal year funds. The collection form will be customized for each State agency to include the year, award number, and award amount of the CSP grants. Providing information on the CSP grants to the State agencies should assist them in gathering the information for this collection. Also at this time (first contact), information describing all phases of data collection, total burden, and the use of additional data sources (EDFacts) to reduce burden will be provided to the State agencies.

*Collect CSP Sub-recipient Award Information from Charter Management Organizations:* Charter Management Organizations that received a Federal CSP grant will be asked to provide the information described in Exhibit 1 for the schools it supported from Federal fiscal year funds. Similar to the collection form used with State agencies, the CMO collection form will include the year, award number, and award amount of the CSP grants. Additional information extracted from EDFacts will reduce the burden for CMOs.

*Collect CSP Grant Award Information from Charter Schools Funded by Direct Grants:* The CSP grant award information for the grantees that are not States or CMOs but received direct grants from ED will be extracted from the G5 grants management database. However, NCES IDs, which are required for linking of other information, are not always available in G5 and will need to be collected from the recipients. ED will require the recipients to verify all of the same information described in Exhibit 1, and to fill in any missing information.

**Exhibit 1**

*Data Elements Included in the Database of Current CSP-Funded Charter Schools and Award Amounts*

<b>Information for Each Federal Fiscal Year CSP Subgrant</b>	<b>Detail</b>
Subgrantee identification (the entity that received the funds)	<ul style="list-style-type: none"> <li>• Subgrantee name</li> <li>• Subgrantee School NCES ID</li> <li>• Subgrantee mailing address</li> </ul>
LEA of the subgrantee (will allow matching of subgrant award information to information from other sources)	<ul style="list-style-type: none"> <li>• LEA name</li> <li>• LEA NCES ID</li> <li>• LEA mailing address</li> <li>• Whether it is an LEA with only charter schools (yes or no)</li> <li>• Whether the charter school acts as its own LEA (yes or no) Note: Not all charter schools are approved by a separate LEA</li> </ul>
Charter School Management Organization (CMO)	<ul style="list-style-type: none"> <li>• CMO type</li> <li>• CMO name</li> <li>• CMO mailing address</li> </ul>
Charter School Authorizer	<ul style="list-style-type: none"> <li>• Authorizer type</li> <li>• Authorizer name</li> <li>• Authorizer mailing address</li> </ul>
<p>Subgrant Award Information</p> <p>Note: States and CMOs will be provided with their award number, the total dollar amount of the award, and the grant period.</p>	<p>For each charter school:</p> <ul style="list-style-type: none"> <li>• Project period begin and end date</li> <li>• Dollar amount of subgrant award from each Federal fiscal year</li> <li>• Month and year of each subgrant award</li> <li>• Type of subgrant (Preplanning, Planning and Program Design, Implementation, or Dissemination), for CMOs (Replication or Expansion)</li> </ul>
Charter school operation	<p>For each charter school:</p> <ul style="list-style-type: none"> <li>• School year school first enrolled students (school year, or “not applicable” for future schools or closed schools)</li> <li>• Student enrollment data for past three years</li> </ul>

Additional Information	<p>For each Charter Management Organization sub-recipient:</p> <ul style="list-style-type: none"> <li>• Grades served for each Federal fiscal year and the year prior to expenditure of CSP funds</li> <li>• Planned grades during the project period</li> <li>• Planned enrollment during the project period</li> <li>• Grade levels served by prior CSP grant (if applicable)</li> <li>• Funding amount of prior CSP grant (if applicable)</li> </ul>
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To assist the State agencies and CMOs, these data are currently collected using a preformatted spreadsheet. For example, the form for each SEA includes the award number, the dollar amount of the award, and the grant period. The product of this data collection is a database of subgrant award information from State agencies, CMOs, and direct grant recipients. As necessary, ED contacts the grantees to verify collected information described above to ensure an accurate and complete dataset.

**A2. Purpose and Uses of the Data**

Extension of OMB approval will allow ED to collect data from current grantees throughout their three-year to five-year performance period. The data collection, combined with the student demographic and performance information extracted from the ED*Facts* database, will allow ED to monitor CSP grant performance and analyze data related to accountability for academic performance and financial integrity. This will satisfy Title V, Part B, Section 5205 of the ESEA, which calls for national activities related to the collection of information, technical assistance, and information dissemination regarding charter schools and the CSP.

As part of the General Education Provisions Act (GEPA) 424 data collection, ED collects information on the allocation of Federal grants by States who are recipients, including grants under CFDA 84.282. ED collected the GEPA data for fiscal years 2002, 2003 and 2004. CSP grants are forward funded. Therefore, the GEPA data available at that time related to school years 2002-2003, 2003-2004 and 2004-2005. ED first began collecting subgrant award data in fiscal year 2005 and the information collected at that time was used in place of the GEPA data collection.

The collection of grant information is needed for the CSP to monitor grantee performance and collect data related to the financial integrity and academic performance of subgrantees. Note that all the demographic and performance data needed for the CSP office is also needed for other purposes. For example, both the CSP and the Office of Special Education Programs need the number of Children with Disabilities (IDEA) in each charter school.

### ***A3. Use of Technology to Reduce Burden***

To assist State agencies, CMOs, and charter schools, the current and future data will be collected using a preformatted Excel spreadsheet, which will be emailed to respondents and completed electronically. All data readily available to ED are included in the spreadsheet. For example, the form for each SEA includes the award number, the dollar amount of the award, and the grant period. The State agency only provides the subgrant award information that is not accessible elsewhere.

As the respondents complete the forms, additional assistance is made available via email and telephone. A toll-free number and email address are available to CSP grantees to allow them to contact the project team with any questions or requests for assistance as they use the form to submit data. This information, along with the names of project contact persons, are clearly printed on the data collection forms and all correspondence.

### ***A4. Efforts to Identify Duplication***

Under NCLB, ED must ensure that new and expanding charter schools receive timely payment of Federal grant funds for which they are eligible. Although ED currently tracks payments to the fiscal agent (generally an SEA or LEA), it does not track payments to the school level. The current and future data collection will allow ED to track CSP grant funds to the school level and gather CSP-related financial information currently unavailable anywhere else.

The data collection efforts under this project gathers CSP subgrant award information from State agencies, CSP sub-recipient information from CMOs, and CSP grant award information from charter schools funded by direct grants. That data alone, however, does not provide enough information to draw conclusions about program effectiveness and efficiency. To ensure that a complete dataset is available, ED combines the new CSP database with data extracted from *EDFacts*. This creates a complete dataset, maximizes the use of existing data sources, and reduces the data collection burden on State agencies, CMOs, and charter schools.

### ***A5. Methods to Minimize Burden on Small Entities***

The current and future data reporting collects data primarily from SEA officials in charge of CSP grants in each State and CMOs that are recipients of CSP grants. The exception to this occurs among the 39 charter schools in 14 states that did not receive or apply for a CSP grant (CT, DE, HI, ID, IL, LA, MD, ME, NC, OH, OR, PA, UT, WA). Schools in these States received direct grants from the CSP, making them individually responsible for providing the

requested data. Regardless of whether the reporting is done by SEA officials, CMOs, or individual schools, the impact on small entities is expected to be minimal.

#### ***A6. Consequences of Not Collecting the Data***

The proposed data collection and subsequent merging of CSP data with existing data will provide ED with the data necessary to effectively monitor the performance and financial stewardship of CSP. The data collection process will be transparent, and the data to be collected will be consistent and easy to consolidate. Failure to collect the new CSP funding data – data not available in *EDFacts* – would seriously hinder ED’s ability to assess CSP’s financial integrity and the link between funding and student outcomes. Further, only by combining CSP financial data with performance data derived from *EDFact* can ED measure CSP’s three GPRA indicators: (1) the percentage of CSP-funded charter school students in grades 4 and 8 at or above proficiency in mathematics; (2) the percentage of CSP-funded charter school students in grades 4 and 8 at or above proficiency in reading; and (3) the Federal cost per pupil in a successful CSP-funded charter school.

#### ***A7. Special Circumstances***

This information collection fully complies with 5 CFR 1320.5.

#### ***A8. Federal Register Comments and Persons Consulted Outside the Agency***

A 60-day FRN was published in December 2014 with no public comments and 30-day FRN was published in February 2015.

#### ***A9. Payment or Gifts***

There are no payments or gifts to respondents other than the allocation of Federal funds that result from the CSP grant award.



***A10. Assurance of Confidentiality***

This collection does not involve collecting any confidential information. Therefore, no assurances of confidentiality are required.

***A11. Justification of Sensitive Questions***

This project does not include any questions of a sensitive nature. As required by the Paperwork Reduction Act of 1995, information is provided to respondents about purposes of the data collection and how the information will be used by ED to monitor CSP grant performance and analyze data related to academic and financial accountability.

***A12. Estimates of Hour Burden***

The estimated annual response burden is 138.84 (139) hours. Exhibit 2 aggregates the estimated total hours and costs to participants. The following section explains how burden estimates were calculated. The hourly rates of pay for SEA, CMO, and LEA/school officials were estimated from California Department of Education Financial Data and U.S. Bureau of Labor Statistics.

**Exhibit 2**

***Estimating the Burden for Reporting***

Type of Respondent	Number of Respondents	Number of Subgrants, Sub-recipients and Direct Grants	Total Minutes per Subgrant	Total Hour Burden	Hourly Rate	Monetary Burden
SEA CSP grantee	20	1,379	5	114.92	\$52	\$5,976
CMO CSP grantee	22	170	5	14.17	\$48	\$680
LEA/School grantee	39	39	15	9.75	\$36	\$351
<b><i>TOTAL</i></b>	<b><i>81</i></b>	<b><i>1,588</i></b>	<b><i>-</i></b>	<b><i>138.84 (139)</i></b>	<b><i>-</i></b>	<b><i>\$7,007</i></b>

The respondents in this data collection are the CSP grantees. Some grantees are SEA officials coordinating and managing the CSP subgrants in each State. Some are CMO representatives administering the CSP grant for schools managed by the organization. Other grantees are officials from CSP-funded charter schools in CT, DE, HI, ID, IL, LA, MD, ME, NC,

OH, OR, PA, UT, WA. Schools in these States apply directly to ED for CSP funds, making them individually responsible for providing the data requested by ED.

There are currently 43 States, including the District of Columbia, with charter school laws. For 20 of these States, the SEA CSP official will be responsible for submitting data to ED on all the subgrants awarded by the State. The 22 CSP Project Directors of CMOs awarded grants will submit data for the sub-recipient schools funded by these organizations. In the 14 States in which CSP grants are awarded directly to charter schools, 39 schools currently receive CSP grants. Each of these schools will also submit data to ED, making the total number of respondents 81.

We estimate that submitting the data for each CSP subgrant or sub-recipient will take anywhere from 5 to 15 minutes, depending on how many years the school (subgrantee) has received funding and if the school is currently serving students. In the latter case, no enrollment data is collected and so the number of data elements to report on is reduced. Further, as grantees update their data collection forms in subsequent years, they need only update the award amount and add any new subgrants or sub-recipients to the database, further reducing the overall reporting requirements over the course of the CSP grant.

For SEA respondents, the total burden will vary depending upon the number of subgrants their State awards. The 20 States that receive CSP grants currently award over 1,300 subgrants to individual schools. The total burden for all SEA officials is 114.92 hours. Similarly, the total burden for CMO respondents is dependent on the number of sub-recipients supported by their grant. The 22 CMO grantees currently support 170 individual schools, the total burden is 14.17 hours. In the case of schools or LEAs that receive their grants directly from ED, the total burden is 9.75 hours. We are allowing more time for school or LEA respondents to complete the form because they also need to verify the grant award amount from ED.

The estimated total time for the reporting is 138.84 (139) hours at an estimated total cost of \$7,007.

### ***A13. Estimate of Cost Burden to Respondents***

There are no additional respondent costs aside from those outlined in section A12.

### ***A14. Estimate of Annual Cost to the Federal Government***

The total cost to the Federal Government for the data collection is \$250,000 annually. These costs are associated with (1) determining the data elements to be included in the reporting, (2) providing technical assistance to respondents on how to complete the data collection form, (3) merging the CSP grant award information with ED*Facts* data to create a complete dataset of

financial, demographic, and achievement data for CSP schools, and (4) analyzing and reporting on the data from all CSP grantees for ED. Data collection under the current contract began on September 26, 2011. The contract ends on September 25, 2015. For the last year of the contract, the total cost is \$323,928.75.

#### ***A15. Program Changes or Adjustment***

There is an overall increase in annual reporting burden. The total burden from the previous request was 98 hours. The new burden is 139 annual hours at a total cost of \$7,007.

In 2010, the CSP program commenced a new grant competition to support non-profit charter management organizations in replicating or expanding high-quality charter schools. This new competition, which is a program change due to agency discretion, increased the number of respondents by 22, increased the burden hours by 14.17, and increased the costs by \$680.

At the same time, there is an adjustment increase. The reason for this adjustment is two-fold: The number of respondents has changed, and the number of sub-grants is better known to ED, which allows for a more precise calculation of the total burden hours. The data elements remain the same for the current and future data collection activities. The adjustment increased the number of SEA and non-SEA respondents (17), the burden hours (27.22), and the costs (\$1352).

#### ***A16. Plans for Tabulation and Publication of Results***

One of the data collection requirements is to analyze, report, and summarize the data obtained from SEA, non-SEA, and CMO grantees. The current analysis plan addresses various aspects of program effectiveness and efficiency such as the program information needs outlined in the January 2005 GAO report, program information required to determine achievement of CSP GPRA indicators, and other information to successfully respond to the OMB PART. From this analysis, ED and the CSP can effectively monitor CSP grant performance and analyze data related to accountability for academic performance and financial integrity.

Upon renewal of OMB approval we will continue to produce annual reports summarizing the data collection and analysis process. The reports will be written and organized with a national audience in mind, therefore making the content usable for a variety of readers, including charter school developers, operators, board members, teachers, parents, researchers, and authorizers. In 2010, we published the first round of State Charter School Profiles, which presented proficiency data for charter schools and traditional public schools in each state. These profiles will be updated and published annually using the data from this collection and the performance data

available from the ED*Facts* database. Further, we will be prepared to brief program staff and/or policy makers about results as needed throughout the study's duration.

Finally, we will prepare a data file containing all data collected. This data file will include an explanation of contents, including variable and category labels, weights, a description of how missing data were addressed, and the unit of observation for each data file.

***A17. Project Schedule***

The current CSP data collection began with fiscal year 2005 and will continue through the end of fiscal year 2015. All data collection and reporting activities will end by September 25, 2015. Some CSP grantees will use the data collection form, pending approval, in Spring 2015 as they are submitting their CSP grant Annual Performance Report (APR). The remaining grantees will use the form to report on their subgrantee activities on or around September 2015, in conjunction with the submission of their Final Performance Report (FPR). The data will be analyzed and included in a comprehensive report at the end of the project (September 25, 2015).

***A18. Approval to Not Display OMB Expiration Date***

No request is being made for exemption from displaying the expiration date.

***A19. Explanation of Exceptions***

This collection of information involves no exceptions to the Certification for Paperwork Reduction Act Submissions.

***PART B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS***

The results of this information collection will not be published for statistical purposes.

## Citations

Government Accountability Office (January 2005). *Charter Schools: To enhance Education's monitoring and research, more charter school-level data are needed*. Washington, D.C.: Government Accountability Office.

Government Accountability Office (October 2005). *Education's Data Management Initiative: Significant progress made, but better planning needed to accomplish project goals*. Washington, D.C.: Government Accountability Office.

Lake, Robin J., and Paul T. Hill, Editors (November 2005). *Hopes, fears, & reality: A balanced look at American charter schools in 2005*. Bellingham, WA: National Charter School Research Project, Center on Reinventing Public Education, Daniel J. Evans School of Public Affairs, University of Washington.