

OMB Clearance Package
Supporting Statement Part A

**“TEACH Grant: Study of Institutional Practices and
Grant Recipient Outcomes and Experiences.”**

Information Collection

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SUPPORTING STATEMENT, PART A PAPERWORK REDUCTION ACT SUBMISSION

A. Justification

The proposed data collection will inform the U.S. Department of Education's (Department's) response to recommendations from the Government Accountability Office (GAO) on the Teacher Education Assistance for College and Higher Education (TEACH) Grant program. The Department requests OMB clearance to collect data through a survey of 1) institutions of higher education (IHEs) administering the TEACH Grants and 2) a sample of TEACH Grant recipients. Survey results will inform a study that responds to GAO recommendations. The study will describe how institutions inform and support students who are eligible for TEACH Grants. Pending clearance, the research team will administer a survey of 473 IHEs that participate in the TEACH Grant program and a sample of 500 individuals who received TEACH Grants.

Introduction

Teacher quality is one of the strongest school-level predictors of student success¹ and disadvantaged students, on average, receive less effective teaching². The TEACH Grant program, which is authorized by Subpart 9 of the College Cost Reduction and Access Act of 2007³, supports aspiring teachers who agree to teach in high-need schools and subject areas. The TEACH Grant program provides grants of up to \$4,000 a year to students who are completing or plan to complete coursework needed to begin a career in teaching. To be eligible for a TEACH Grant award, enrolled students must be completing academic coursework and other requirements necessary to begin a career in teaching, or plan to complete such coursework and requirements prior to graduation. As a condition for receiving a TEACH Grant, recipients must sign a "TEACH Grant Agreement to Serve" in which recipients agree to (among other requirements):

- Teach in a high-need field.
- Teach at an elementary school, secondary school, or educational service agency that serves students from low-income families.
- Teach for at least four full academic years within eight years of completing (or ceasing enrollment in) the course of study for which the recipient received the grant.

If a TEACH Grant recipient does not complete the service obligation, their TEACH Grant funds are converted to a Direct Unsubsidized Loan, which would include interest accrued up to that date. Individual colleges and universities elect whether to participate in the program and choose the grade levels and education programs in which students may receive the grant.

In the February 2015 report entitled, "Financial Aid for Teachers: Better Management of Teacher AID Programs Needed to Improve Participant Outcomes," GAO recommended that the Department:

- Take steps to determine why participants are not able to meet TEACH Grant service requirements and examine ways to address those challenges.

¹ R. Chetty, J.N. Friedman, and J.E. Rockoff (2011). The long-term impacts of teachers: Teacher value-added and student outcomes in adulthood (NBER Working Paper 17699). Cambridge, MA: National Bureau of Economic Research.

² J. Max and S. Glazerman (2014). Do disadvantaged students get less effective teaching? Key findings from recent Institute of Education Sciences studies. <http://ies.ed.gov/ncee/pubs/20144010/pdf/20144010.pdf>

³ <https://www2.ed.gov/policy/highered/reg/hearulemaking/2008/teachstatute.pdf>

- Explore and implement ways to raise awareness about the TEACH Grant and the loan forgiveness programs.
- Establish program performance measures for the TEACH Grant and the loan forgiveness programs to assess against established goals and to inform program administration.⁴

The proposed data collection will inform the Department’s work in addressing these recommendations.

Research Questions

The TEACH Grant Study is designed to answer the following questions:

- How are TEACH Grants advertised and administered in institutions of higher education?
- To what extent do TEACH Grant recipients identify the TEACH Grant as contributing to their decisions to teach in high-need fields in low-income schools
- What are the factors associated with TEACH Grant recipients meeting and not meeting the grant service requirements?

Taken together, these research questions aim to provide descriptions of how institutions may be able to better support grant recipients in meeting program service requirements.

Survey

The Department requests OMB clearance for a survey of 473 IHEs⁵ and a survey of 500 separated grant recipients⁶ during a period that begins in early 2016. The study will address questions pertaining to both institutional and recipient issues and challenges associated with the TEACH Grant at all stages of the grant process.

A.1. Circumstances Requiring the Collection of Data

A February 2015 GAO report on the TEACH grant program, “Financial Aid for Teachers: Better Management of Teacher AID Programs Needed to Improve Participant Outcomes,” expressed concerns regarding the high grant-to-loan conversion rate among TEACH Grant recipients. The GAO recommended that the Department take several actions in exploring ways to raise awareness about the grant program, determine why participants are not able to meet grant requirements, and establish performance measures for the program. Further, institutional eligibility for participation in the program is tied to compliance with accountability requirements in the recently proposed regulations for teacher preparation program reporting⁷. The TEACH program is authorized under Subpart 9 of the College Cost Reduction and Access Act.⁸

A.2. Purposes and Use of Data

The Department will use the study results to inform policy and guidance related to TEACH Grant awareness, reducing grant-to-loan conversion rates, improving institution-level implementation, and strengthening the ability of the Department to provide technical assistance to IHEs.

A.3. Use of Information Technology to Reduce Burden

⁴ <http://gao.gov/products/GAO-15-314>

⁵ 473 represents the universe of institutions that administered TEACH Grants to at least 10 recipients in the 2014-2015 award year. 95% of TEACH Grant recipients in that award year were enrolled in those 473 institutions.

⁶ “Separated recipients” refers to recipients no longer enrolled in their TEACH-granting institution.

⁷ <https://www.federalregister.gov/articles/2014/12/03/2014-28218/teacher-preparation-issues>

⁸ <https://www2.ed.gov/policy/highered/reg/hearulemaking/2008/teachstatute.pdf>

The research team will use information technology to reduce burden by providing an online option to complete surveys.

A.4. Efforts to Identify and Avoid Duplication

The Department has determined that no similar data collection activities have occurred for the TEACH Grant program since its inception in 2008.

A.5. Efforts to Minimize Burden on Small Businesses or Other Entities

The data collection will not affect small businesses.

A.6. Consequence if the Information Is Not Collected or Collected Less Frequently

If the proposed information is not collected, the Department will not fully be able to develop evidence to improve support to IHEs in administering TEACH Grants. Specifically, the Department would not be able to fully respond to GAO recommendations that we 1) determine why participants are not able to meet TEACH Grant service requirements and examine ways to address those challenges, 2) explore and implement ways to raise awareness about the TEACH Grant and the loan forgiveness programs, or 3) collect further evidence to develop performance measures for the TEACH Grant program, and ultimately contribute to reducing the grant to loan conversion rate and student indebtedness. In addition, if the proposed information is not collected, the federal government will miss the opportunity to provide timely and practical information to IHEs, graduate and undergraduate students, policymakers, and federal personnel on ways to reduce the grant-to-loan conversion rate and improve administration of the TEACH Grant program. The collection and subsequent analysis of administrative practices and student experiences with the TEACH Grant will be used to inform future policy and management of federal grant and loan forgiveness programs aimed at recruiting and retaining highly qualified teachers.

A.7. Special Circumstances

No special circumstances are anticipated. The data collection will comply with 5 CFR 1320.6.

A.8. Federal Register Comments and Persons Consulted Outside of Agency

In the process of designing this data collection, the Department had brief consultations with representatives from four IHEs who are responsible for administering TEACH Grants at their respective institutions. The primary purpose of this consultations was to get a general sense of how IHEs are administering TEACH Grants.

The 60 day notice for this collection was published on September 25, 2015. Two general comments were received related to feedback on the TEACH Grant program and its administration. One commenter suggested that the program should be re-branded as a loan with forgiveness option instead of a grant. Another commenter questioned the overall value of the program. The Department has received these comments and will consider these comments as well as findings from the proposed data collection in efforts to improve the program.

A.9. Payment to Respondents

No payments will be provided to IHE representatives completing the IHE survey.

TEACH Grant recipients who are selected to participate in the recipient survey will be offered a \$20 incentive for returning a completed survey.

A.10. Assurances of Confidentiality

Responses to this data collection will be used to summarize findings in an aggregate manner (across groups of sites), or will be used to provide examples of program implementation in a manner that does not associate responses with a specific site or individual. In the report, pseudonyms will be used for each site. The study team may refer to the generic title of an individual (e.g., “project director,” or “financial aid administrator”) but neither the site name nor the individual name will be used. All efforts will be made to keep the description of the site general enough so that a reader would never be able to determine the true name or identity of the site or individuals at the site. The study team will make sure that access to all data with identifiable information is limited to members of the study team. The study team will not provide information that associates responses or findings with a subject or district to anyone outside the study team, except as required by law. The contractor implementing the study will ensure that collected data will be protected by instituting procedures for encrypting data, using alternative unit identifiers, proper data disposal at the end of the project, etc.⁹

A.11. Justification for Questions of a Sensitive Nature

The surveys do not include sensitive questions and focuses primarily on descriptions of programs and services offered at an institution of higher education, as well as recipient experiences with the TEACH Grant. The surveys are voluntary surveys and no persons are required to respond.

A.12. Estimate of Information Collection Burden

This request applies to a sample of 473 IHEs and 500 individual TEACH Grant recipients. The research team estimates that the IHE survey will take approximately 60 minutes to complete. With a 473 sample and an estimated 80 percent response rate, the Department estimates the total burden across IHEs to be 378 hours. With a sample of 500 individual recipients, an estimated 20 minutes to complete the recipient survey, and an estimated 70 percent response rate, the Department estimates the total recipient burden of 117 hours. The total combined burden estimate across all IHEs and recipients is 495 hours. Given that this information collection clearance request applies for three years, the annual respondent burden per year over those three years is 165 hours. Table 1 below shows the calculations for estimated total time burden.

Survey	Sample size	Estimated response rate	Estimated time per survey (minutes)	Total time burden (hours)
IHEs	473	80%	60	378
Recipients	500	70%	20	117
Total				495
Annualized basis				165

Using an hourly rate of \$41.58¹⁰ for postsecondary education administrators and an estimated 384 hours of total burden, the total estimated cost of IHE administrator respondents' time is \$15,734. Using an

⁹ Details on methodology pending final contract award

hourly rate of \$26¹¹ for teachers and an estimated 117 hours of burden, the estimated cost per recipient respondents is \$3,033. The total estimated cost burden to IHE and recipient respondents is \$18,767. Given that this information collection clearance request applies for three years, the annual respondent burden cost per year over those three years is roughly \$6,256. Table 2 below provides the calculations of estimated cost burden.

Table 2. Estimated Cost Burden to Respondents			
Survey	Total time burden (hours)	Hourly rate	Estimated cost
IHEs	378	\$42	\$15,734
Recipients	117	\$26	\$3,033
Total			\$18,767
Annualized basis			\$6,256

A.13. Estimate of Cost Burden to Respondents

There is no capital or start-up cost component to these data collection activities, nor is there any total operation, maintenance, or purchase cost associated with the study.

A.14. Estimate of Annualized Costs

The estimated cost to the federal government for data collection activities is \$625,000. This includes contractor costs for implementing the surveys such as creating an online version of the surveys, contacting respondents, following up with non-respondents, and providing \$20 incentive fees to recipient respondents. Given that this information collection clearance applies for three years, the annual cost to the federal government per year across this three-year time period is estimated at \$208,333.

A.15. Change in Annual Reporting Burden

This is a new study/data collection.

A.16. Plans for Tabulation and Publication of Results

The data collection period will begin in early 2016, pending OMB approval.

Letters to survey recipients will be sent out in early 2016, pending receipt of OMB approval.

A study report will summarize the current state of TEACH Grant administration and the experiences of recipients. The report will include a synthesis of relevant key findings and data tabulations from the survey. The report will be posted on the Department’s website. The report is planned for release before the end of 2016.

A.17. Expiration Date Omission Approval

Not applicable. All data collection instruments will include the OMB data control number and data collection expiration date.

¹⁰ <http://www.bls.gov/ooh/management/postsecondary-education-administrators.htm>

¹¹ <http://www1.salary.com/Teacher-Elementary-School-hourly-wages.html>

A.18. Exceptions

Not applicable. No exceptions are requested.