

REQUEST FOR CLEARANCE OF PROPOSED STUDY

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

Survey on Use of Funds Under Title II, Part A

A. JUSTIFICATION

This package requests approval for a data collection that will include an annual survey of a state representative sample of traditional school districts, a nationally representative sample of charter school districts, and an annual request for each state to provide a list of districts that receive Title II, Part A funds and each district's allocated Title II, part A amount. We anticipate that the state education agency (SEA) data collection will begin in January and the school district surveys will begin in February 2018.

The Elementary and Secondary Education Act (ESEA), as reauthorized by the Every Student Succeeds Act of 2015 (ESSA), continues to place a major emphasis on teacher quality as a significant factor in improving student achievement. Under the ESEA, Title II, Part A (Supporting Effective Instruction) provides funds to SEAs and local educational agencies (LEAs) to support effective instruction through the preparation, training, and recruitment of high-quality teachers, principals, and other school leaders. LEAs are provided Title II, Part A State activities funds for this purpose, allowable uses of which include:

- Developing and implementing evaluation systems for teachers, principals, and other school leaders
- Developing and implementing initiatives to assist in recruiting, hiring, and retaining effective teachers
- Recruiting qualified individuals from other fields to become teachers, principals, or other school leaders
- Reducing class size by recruiting and hiring additional effective teachers
- Providing high-quality, evidence-based professional development for teachers, principals, and other school leaders
- Developing programs to improve the ability of teachers to teach children with disabilities and English learners
- Providing training to assist teachers, principals, and other school leaders with selecting and implementing assessments, and using data from those assessments
- Carrying out in-service training for school personnel
- Providing training to support the identification of gifted and talented students

1. Explanation of Circumstances That Make Collection of Data Necessary

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 activities allowed under 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 what funds LEAs receive and how LEAs use Title II, Part A funds, the Department has used this survey to collect information on the provision of professional development in LEAs. The Department initially collected professional development data through the Consolidated State Performance Report (CSPR), but poor data quality led the Department to collect the data directly from LEAs rather than through the States. To get a better understanding of how LEAs within their state context are using their funds, the Department is expanding the LEA sample to include a state representative sample of 5,000 traditional LEAs. Since charter school LEAs may use Title II, Part A differently than traditional LEAs, the survey is also being administered to a nationally representative sample of charter school LEAs. Analyses from this data collection will be complementary to the SEA data collection that was approved in a prior OMB submission (Approval #1810-0711).

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

Clearance Request:

This OMB clearance request is to continue these analyses using updated data collection instruments that reflect changes due to the reauthorization of ESEA by ESSA. The proposed changes to the LEA survey are meant to address

new reporting requirements outlined in Section 2104(b) of ESEA. Section 2104(b) requires LEAs to provide SEAs with a description of how Title II, Part A funds are used; how funds are used to improve equitable access to teachers for low-income and minority students; and, where applicable, evaluation and retention data for teachers, principals, and other school leaders.

Please see Appendix A for a copy of the proposed data collection instrument for the 2018-19 survey. Westat will conduct the LEA survey data collection for the 2018-19 survey cycle through 2020-21. Please see Appendix B for a copy of the proposed SEA Allocation Request Form. Appendices C and D provide sample notification letters.

2. How the Information Will Be Collected, by Whom, and For What Purpose

The study will rely on surveys. Information will be collected annually from a nationally representative sample of 5,345 LEAs (5,000 traditional LEAs and 345 charter school LEAs) as well as a brief data request from each SEA to provide a list of their state's allocation of Title II, Part A funds by LEA. The information obtained will be used by the Department to describe how LEAs use Title II, Part A funds. To the extent possible, the results of this study will be compared with similar results obtained under previous OMB clearances for school years 2002-03 through 2016-17 and reported to Congress and to the public (see <http://www.ed.gov/programs/teacherqual/resources.html>). Study results will be presented to State Title II, Part A coordinators and will support evidence-based use of the funds.

3. Use of Improved Information Technology to Reduce Burden

Respondents will be asked to complete the surveys using an online data collection system. To minimize reporting burden, the LEA surveys will be pre-populated with the amount of funds made available to each LEA obtained from the allocations requests administered to the SEAs. In addition, identifying information for each district from the National Center for Education Statistics (NCES) Common Core of Data (CCD) will also be pre-populated into the surveys. The use of pre-populated survey forms reduces burden on the respondents and enhances data accuracy as the forms are submitted.

4. Efforts to Identify and Avoid Duplication

The information requested in the LEA Survey on the Use of Funds Under Title II, Part A is only being collected by the existing survey, and is not available in other forms. This data collection effort is part of a planned, ongoing data collection to describe the activities supported by Title II, Part A program by LEAs. This data collection is being coordinated by IES with an annual administration of an SEA survey, which describes activities supported by Title II, Part A program at the state level, OMB 1810-0618.

5. Efforts to Minimize Burden on Small Business or Other Entities

All respondents for this data collection are LEAs. Each year, approximately 80% of the traditional LEAs sampled (4,000 of the total sample of 5,000), would be considered small entities with a population of fewer than 50,000. Population data are not available for most charter school LEAs. In recent years, the survey moved to an online data collection to minimize the reporting burden for respondents; previously, they would have to complete the survey on paper and either return it by mail, fax, or e-mail. In addition, we also allow respondents to provide their best estimates rather than requiring exact figures to ease reporting burden, particularly for smaller LEAs that would have fewer staff and less staff time to allot to completing the survey.

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 has 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, particularly with the revisions to the program and allowable uses of the funds following the reauthorization of ESEA by ESSA. The main consequence of not collecting this Title II, Part A data on an annual basis is that the Department and Congress will not have up-to-date information on how LEAs are using their

Title II, Part A funds. In addition, reporting requirements under Section 2104(b) will not be met. 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 that 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 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:

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. Federal Register Comments and Persons Consulted Outside the Agency

The 60-day *Federal Register* notice was published in the Federal Register, on Monday, December 4, 2017. 11 public comments on the package were received that raised concerns about the district survey regarding: i) the alignment of the data collection to the new law, ii) the burden associated with the data collection; and iii) a few specific suggestions for clarity. The survey was revised in response to these comments to increase clarity and usability of the data and to reduce respondent burden. There was one comment related to the survey being administered prior to implementation of ESSA; the comment is no longer applicable since the survey will be administered in the spring of 2019, after ESSA implementation begins.

The 30-day *Federal Register* notice will be published to solicit additional comments.

The Department consulted with several SEAs and LEAs to determine the feasibility of the data collection. We also conducted a pilot test for the LEA survey instrument. In selecting the LEAs to participate in the pilot test, we sought to include LEAs of varying sizes and locations. 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 revisions to the wording on the data collection instrument to increase clarity and usability of the data and to reduce respondent burden.

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

The table below provides an estimate of time burden for the data collections, broken down by instrument and respondent. The estimates for the district survey are based on the pre-test findings.

Respondent/ Data request	Number of targeted respondents	Expected response rate (%)	Annually			
			Number of respondents	Unit response time (hours)	Total response time (hours/year) f	Total burden time (hours)
LEAs	5,345	80	4,276	2	8,552	8,552
SEAs	50	100	50	.5	25	25
Annual Total (rounded)	5,395		4,326		8,577	8,577

The number of annual and 3-year targeted respondents are 5,395 and 16,185 (5,395 * 3), respectively and the annual number of responses is 4,326. The total burden is estimated at 25,731 or an estimated average annual burden of 8,577 burden hours calculated across 3 years.

The total of 8,577 hours annually includes the following efforts: up to 2 hours for each of the 4,326 LEAs to complete the LEA survey; up to .5 hours for each SEA to record their Title II, Part A LEA allocation information. Annually, a sample of 5,395 LEAs will be asked to complete the data collection instrument. The annual cost (at \$45.86 per hour¹) is estimated to be \$393,341.22. Westat has estimated this cost based on previous experience with similar data collections and the pilot experience.

13. Estimates of Cost Burden for Collecting Information

There are no costs that (1) meet the criteria for inclusion under this item and (2) have not been addressed in either item #12 or #14.

14. Estimated Annualized Cost to the Federal Government

The cost breakdown across the major tasks for the survey are as follows:

- Cost for revising existing data collection system: \$19,000 (140 hours)
- Survey development/preparation, sampling, and mailing: \$31,000 (410 hours)
- Technical assistance during data collection: \$19,000 (160 hours)

In the following years, the annualized cost is estimated to be \$50,000.

Each year, the estimated cost for data analysis and reporting is \$21,250 (170 hours). As such, the total costs for conducting this study are \$71,250 in subsequent years.

These estimates are based on previous experience with this data collection. Westat already has the data systems in place to collect and analyze these data, but the data collection systems will need to be revised to accommodate the new LEA survey instrument, and the analyses will need to be updated to accommodate state-level estimates and charter school LEA estimates.

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 based on the total annual hours increasing due to an increase in the number of respondents. The increase in respondents is considered a program change so that the Department can produce state level estimates, something SEAs have argued would make the information more useful.

16. Plans for tabulation and publication of results

We anticipate that the result of analyses from these data will be combined with analyses from an SEA data collection (a prior submission, approval #1810-0711 and be published in a short report similar to the 2015-16 results currently available on the Department's website (<https://www2.ed.gov/programs/teacherqual/resources.html>). The report will consist of simple descriptive statistics and cross tabs. 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 will prepare annual reports presenting descriptive analyses based on this data collection and SEA Title II, Part A data collected by EDfacts. The first report has a projected release date in 2019 and annually thereafter and will describe how SEAs and LEAs use their Title II, Part A funds. The reports will be published on the Department's website.

¹ Assumes an hourly rate \$45.86 per hour for educational administrators (derived from the Bureau of Labor Statistics' Occupational Employment and Wages for educational administrators, May 2016. See: <https://www.bls.gov/oes/current/oes119032.htm>).

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.