

Title II District (LEA) Survey 60-Day Comment Responses

Question 1

Comment: One commenter stated that the changes in the survey for reporting the uses of funds during the 2016-17 school year (SY) is inconsistent with the statute, because the commenter states that the ESEA, as amended by No Child Left Behind (NCLB), was still in effect. This commenter stated that the changes to the survey would be appropriate for reporting uses of funds during 2017-18 school year, after the Every Student Succeeds Act, went into effect.

Discussion: The Department appreciates this comment. However, this survey is not collecting information on the use of funds in the 2016-2017 school year. The survey is for reporting how LEAs used Title II, Part A funds during the 2017-2018 school year. The Department declines to make any changes in response to this comment.

Change: No change.

Comment: One commenter suggested allowing LEAs to import into the LEA survey information from their own professional development management systems, in order to reduce the burden on respondents.

Discussion: The Department appreciates this comment. At this time, the Department is unable to alter the system so that LEAs can import data from their own, separate systems. Therefore, we decline to make any changes in response to this comment.

Change: No change.

Comment: One commenter stated that the changes in number of allowable activities would likely increase the burden on the respondents, because LEAs now have to differentiate between additional choices, and, as the commenter states, many Title II, Part A funded activities meet more than one allowable activity.

Discussion: The Department appreciates this comment and has altered the categories to be mutually exclusive to address this comment. There are also fewer categories to increase the accuracy of the data to be collected and to reduce burden.

Change: Q1 has been revised.

Comment: One commenter stated that the change to survey question 5 to include all teachers, not only core content teachers, may increase the burden on respondents.

Discussion: The Department appreciates this comment and has streamlined the question to reduce burden and increase the accuracy of the information collected.

Change: Question 5 has been replaced with question 7 and allows districts to estimate teacher participation rates within broad categories.

Comment: One commenter stated that it may be difficult for respondents to determine whether to include specific professional development activities if, for example, paid for in part by other sources of Federal funds, or if funds are transferred.

Discussion: The Department appreciates this comment and has greatly streamlined the information collected but still inform the nature and content of professional development activities as well as prioritization of funding among professional development activities.

Change: We have provided clarification that the professional development referenced includes professional development funded *in part* by Title II, Part A. In addition, questions 6a, 6b, and 7 have been revised and replaced with questions 8-10.

Comment: One commenter stated that the professional development methods listed do not focus on “job-embedded” professional development, and asked whether we could add methods, such as professional learning communities, early release professional development, lesson studies, and learning team sessions, to the survey.

Discussion: The Department appreciates this comment and has included some of these strategies as examples under a broader category. We decline to specifically call out all other forms of professional development, but Question 8 does include an “other” category for respondents to add a method that is not on the list.

Change: Question 6a has been replaced with question 8.

Comment: One commenter stated that the changes of topics in survey Question 7 will likely increase the burden for districts, particularly in the first year for those that use electronic based professional development management systems. The commenter also suggested reordering the topics in accordance with Sec 2103(b)(3)(E).

Discussion: The Department appreciates this comment and has revised the topic areas. The burden estimates account for these changes.

Change: We have revised the topic areas in this Question.

Comment: One commenter asked if the “other” option under Question 7 is meant to include all other topics of professional development not included in the survey. The commenter also inquired as to why the survey items do not cover other topics of professional development, such as those in section 2103(b)(3)(H)-(J) and (L).

Discussion: The Department appreciates this comment and has included revised topic areas at a more aggregate level than those listed in the statute to limit burden.

Change: We have revised the topic areas in this Question.

Comment: One commenter for clarification regarding the fact that the questions do not ask about principals and paraprofessionals.

Discussion: The Department appreciates this comment and we have revised the survey to include principals, where appropriate.

Change: We added “principals” to questions 3b and 10 in the survey. Although title II-A funds can be used to support paraprofessionals, the Department has elected to not include them in this survey at this point to limit burden.

Question 2

Comment: One commenter suggested that the survey should collect information on whether LEAs use Title II, Part A funds to reduce the cost of pursuing national board certification, provide time for teachers to pursue certification, offer mentoring to teachers pursuing certification, and award stipends to National Board Certified Teachers.

Discussion: The Department appreciates this comment. The survey specifically follows the activities listed in the statute, and as such, we decline to make changes in response to this comment.

Change: No change.

Comment: One commenter stated that the professional development categories that LEAs respond to are too broad and do not provide insight into specific issues.

Discussion: The Department appreciates this comment about the district Title II-A survey but declines to make any further changes to the survey items and the professional development topics addressed.

Change: No change.