

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

1. Importance of the Information

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 State educational agencies (SEAs) to support effective instruction through the preparation, training, and recruitment of high-quality teachers, principals, and other school leaders. States are provided Title II, Part A State activities funds for this purpose, allowable uses of which include:

- Reforming teacher, principal, or other school leader certification, recertification, licensing, or tenure systems or preparation program standards and approval processes
- Developing, improving, or providing assistance to LEAs to support the design and implementation of teacher, principal, or other school leader evaluation or support services
- Improving equitable access to effective teachers
- Carrying out programs to establish, expand, or improve alternative routes for State certification of teachers, principals, or other school leaders
- Developing, improving, and implementing mechanisms to assist LEAs and schools in effectively recruiting and retaining teachers, principals, or other school leaders who are effective

Beginning in 2013-14, the Department began surveying SEAs to obtain data on how SEAs were utilizing their Title II, Part A State activities funds. The survey also sought to determine how many individuals and full-time equivalents (FTEs) were funded by either Title II, Part A State activities or administrative funds, and it explored SEA usage of State activities funds to support college- and career-ready standards, educator evaluation systems, and the equitable distribution of effective or highly qualified teachers. The updated survey will be revised to account for the new allowable activities in the statute, ask about allocations of funds in additional areas of interest, and request data on teacher evaluation and retention to help SEAs meet new reporting requirements under Section 2104(a).

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 SEA survey are meant to address new reporting requirements outlined in Section 2104(a) of ESEA. Sections 2104(a) requires SEAs to provide 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 2017-18 survey. Westat will conduct the data collection for the 2017-18 survey cycle. Beginning in 2018-19 and moving forward, data will be collected via *EDFacts*.

2. Purposes and Uses of the Data

The information will be collected annually from 52 SEAs from the 50 States, the District of Columbia, and Puerto Rico. The information obtained from the surveys will provide the Department with a description of how Title II, Part A State activities funds are used by each State. In addition, the survey will provide data on the number of individuals

funded by Title II, Part A funds at the State level, as well as data on teacher, principal, and other school leader evaluation and retention. To the extent possible, the results from the survey will be compared with results obtained from previous data collections. The results have been presented to State Title II, Part A coordinators during their annual meeting. See Appendix A for a copy of the proposed data collection instrument.

3. Improved Information Technology

Data will be collected via *EDFacts*.

4. Efforts to Identify Duplication

The information requested in the 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 nature of the Title II, Part A program as it is implemented at the LEA and SEA levels.

5. Methods Used to Minimize Burden on Small Entities

Small businesses or other small entities are not affected by this program. All respondents for this data collection are SEAs.

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 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 would not have complete information for its GPRA indicators and Congress will not have up-to-date information on how SEAs are using their Title II, Part A funds. In addition, reporting requirements under Section 2104(a) 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 than 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. Consultations Outside the Agency

Due to the significant revisions to the data collection tools to accommodate ESEA as reauthorized by the ESSA, we will conduct pilot tests for the new instrument. The SEAs selected will be of varying sizes and locations. We will use the feedback from the pilot tests to revise the instruments and burden statements as needed. The pilot tests will include at least nine respondents. Technical assistance will be provided to the SEAs responding to the survey. A 60 day notice was published on September 27, 2017 (82 FR 45010). Public comments received are addressed in the attached Title II Survey 60Day Comment Period Responses. A 30 day federal register notice was published on January 4, 2018 (83 FR 523).

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

Annually, 52 SEAs (50 states, the District of Columbia, and Puerto Rico) will be submitting data via *EDFacts*. We estimate that the SEA survey will take an average of 10 hours to complete. The cost to respondents is estimated to be \$35 per hour for a total cost to respondents of approximately \$18,200 for the 2018-19 data collection. These costs are based on prior year costs and estimates of burden for any new questions, and may be revised following the pilot test.

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

For the 2017-18 cycle, Westat will conduct the data collection. The cost breakdown across the major tasks for the survey are as follows:

- Cost for revising existing data collection system: \$6,000 (50 hours)
- Survey preparation and mailing: \$2,400 (30 hours)
- Technical assistance during data collection: \$9,600 (90 hours)

In total, the cost to the government for Westat collecting the data in 2017-18 will be about \$18,000.

Beginning in the 2018-19 cycle and moving forward, data for the survey will be collected via *EDFacts*. *EDFacts* will need to prepare the data collection system for the SEA survey in 2018-19, and in the subsequent years will be able to reuse the system. The cost in 2018-19 for *EDFacts* to build the survey and conduct the data collection, including the providing technical assistance to respondents during data collection, is \$50,000. In the following years, the annualized cost is estimated to be \$30,000.

Each year, the estimated cost for data analysis and reporting is \$8,750 (70 hours). A report will not be prepared for the 2017-18 collection. As such, the total costs for conducting this study is \$18,000 in the first year (2017-18), \$58,750 in the second year (2018-19), and \$38,750 in subsequent years. These estimates are based on previous experience with this data collection.

15. Explain the reasons for any program changes or adjustments reported in Item 16 of IC Data Part 1.

Appendix B contains a summary of changes for the survey instrument. The total annual hours has increased due to the increased level of detail requested in the table in Question 1 on the allocations by allowable activity, additional questions on allocations in various areas, and requests for data on teacher evaluation and retention. We estimate that these revisions have increased the hours required to complete the survey from five hours in the previous clearance to 10 hours. As a result, the total annual hours has increased from 260 hours to 520 hours. These hours may be revised following pilot tests of the survey instrument.

16. Tabulation and Analysis Plan and Schedule

We anticipate that the results of both studies will be published in an issue brief similar to the 2015-16 results currently available on the Department's website (<https://www2.ed.gov/programs/teacherqual/resources.html>). 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 anticipate using the same schedule as for previous cycles of this information collection. SEAs will be asked to complete the survey in January of the 2018-19 school year.

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.