

Supporting Statement for Paperwork Reduction Act Submission

Title II Teacher Preparation Program Quality Accountability Reporting Forms

Authorized by the *Higher Education Act* of 1965, as amended in 2008 by the Higher Education Opportunity Act (HEA)

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section¹. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, make note of the sections or changed sections, if applicable.

This statement supports the reporting required under Title II of the HEA, the State Report Card (SRC) and Institution and Program Report Cards (IPRC). The attached forms represent the electronic submission format respondents use to enter required information supporting Title II collection. Title II of the Higher Education Act of 1965, as amended (HEA), established the Title II Teacher Quality Accountability data collection and report to the U.S. Congress to provide more meaningful data on teacher preparation program quality. See http://title2.ed.gov/Public/TA/HEA_2008_Sections%20205_208.pdf. Although the statutory reporting requirements for States and institutions of higher education (IHEs) in section 205(a) and (b) are extensive, a chief purpose of this reporting is to improve the overall quality of teacher preparation programs and the programs' ability to produce teachers who are well-prepared to teach when they enter the classroom.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

In the past, the Department required a grant program to use Title II reporting data to set criteria for grantees to select partners, such as K-12 school districts and schools. For example, Transition to Teaching, a discretionary grant program in the Office of Innovation and Improvement (OII), required applicants to report Title II data showing that teachers at a proposed partner school held State credentials. More recently, the Department has reviewed the available data to determine how to better differentiate program quality as a part of the regulations. The information is being revised in connection with the statute to help provide meaningful information on program quality to prospective teacher candidates, parents, school districts, States, and IHEs that administer traditional teacher preparation programs and alternative route teacher preparation programs leading to State certification or licensure. This information collection would make data available that will better inform academic program selection, program improvement, and accountability.

¹ Please limit pasted text to no longer than 3 paragraphs.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

All States submit electronic data to the Department using the Title II's web-based reporting system. To minimize the burden on respondents, the Office of Postsecondary Education prepopulates Title II Report Cards wherever possible, and provides efficient item entry formats and edit checks. Report Cards, as e-report forms, expedite electronic reporting by using radio buttons to save, exit, and reset in various conditions, text boxes, check boxes, drop down lists, and provide options for assistance with numerous data points reported in lists, real-time edit checks and spell-check. States are required by the HEA to report teacher preparation program participants' pass rates on the SRC, which most states expedite by using testing companies to calculate pass rates, and a few States themselves calculate the teacher test pass rates and upload them into the system.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use of the purposes described in Item 2 above.

The information collected does not duplicate any other information collection effort in the Department. There is no similar information available that can be used or modified for this collection's purpose at this time.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.

A 4-Year institution with a revenue of less than \$27.5 million or a 2-Year institution with a revenue less than \$20.5 million is considered a small entity according to the Small Business Administration. The survey instrument does not collect data on revenue but we were able to estimate that there are possibly 245 small entities that could be affected by this data collection. No methods are being used to minimize the impact on the small entities because the data collection is statutorily mandated, and Congress did not allow for less burdensome collection for small businesses. The Department is making changes to reduce burden to limit the collection to that which is statutorily required and to reduce burden overall where possible by improving efficiencies of collection. Therefore, the Department believes that no additional methods for small entities need to be deployed.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

Title II of HEA mandates this annual data collection. The Secretary as well as the States,

institutions and programs are required to report and would be out of compliance with the statute if the information were not collected annually and reported in a timely manner.

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;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **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;**
- **requiring 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; or**
- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances that would require this information collection to be conducted in any of the ways listed as part of this question.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

The changes in the SRC and IPRC were developed through an open forum process where the public provided its input and in consultation with schools, and a variety of professional associations and other interested parties. There were also preliminary public focus group discussions where the Department consulted with representatives from the teacher preparation community, States, teacher preparation program students, teachers, and other stakeholders about the best way to produce more meaningful data on the quality of teacher preparation programs while also reducing the reporting burden on States and teacher preparation programs where possible.

Changes to the IPRC include the addition of categories for reporting the unique teacher preparation programs offered within each provider; a revised definition for reporting individuals enrolled in teacher preparation programs to include individuals who were enrolled and completed the program in the academic year being reported; revised supervised clinical experience requirement questions to provide clarity and improve data quality; and other minor revisions to provide clarity or better align the IPRC with statutory requirements. None of these changes significantly affect the burden.

Changes to the SRC include those described in the IPRC, as well as a revised process for reporting on program performance and low-performing programs; the addition of structured questions to the Improvement Efforts section to provide clarity and improve data quality; and other minor revisions to provide clarity or better align the SRC with statutory requirements.

The Department is requesting and will consider any comments received during the 30-day public comment period. A Federal Register was published May 16, 2019 (Vol. 84, No. 95, page 22120) requesting public comment on this information collection. Five comments were received during the 60-day public comment period. Based on the comments received the Department will add in #16 “Completion of” before State approval. The Department will also add a row labeled “Other with a check box “to Section IX: Improvement Efforts. None of the noted additions will have any burden impact, which will remain the same. This is a request for the 30-day public comment period.

9. Explain any decision to provide any payment or gift to respondents other than remuneration of contractors or grantees.

No payment or gift will be provided to respondents in connection with this data collection.

10. Describe any assurance of confidentiality provided to respondents.

The information being requested through these Report Cards is required, not voluntary. Much of the required information is public information, since teacher credential requirements are a matter of public record in all States and jurisdictions. The production and verification of pass rates, which involve personally identifiable data, will be handled in accordance with all applicable State and federal laws, including privacy laws. In accordance with HEA, pass rates on tests taken by fewer than 10 examinees will not be reported. Individually identifiable data will also be handled in accordance with all relevant laws, including privacy laws.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered

private. The justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Privacy protected information is not collected in either State or Institutional Report Cards and none of the data points are of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in item 12. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent types, IC activity, Respondent and Responses, Hours/Response, and Total Hours)**
- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

Burden hours associated with this information collection are summarized in the table 1.

The statute requires that IHEs and States establish an information and accountability system through which the nation's 1,541 IHEs providing teacher education programs and all States report on the performance of their teacher preparation programs. Nearly all (99 percent) of the IHEs providing teacher preparation programs are four-year institutions. Sixty percent of these IHEs are private-not-for-profit, 38 percent are public institutions and 2 percent are private for-profit as reported in *The Secretary's Tenth Report to Congress on Teacher Quality* <https://title2.ed.gov/Public/TitleIIReport16.pdf>. States also report data on alternative route to certification programs, including programs based at an IHE and those not based at IHEs. The total number of entities offering teacher preparation programs in 2018 was 1,735.

During roundtables and focus groups, the Department received feedback from representatives from the teacher preparation community and States about the best way to produce more meaningful data on the quality of teacher preparation programs while also reducing the reporting burden on States and teacher preparation programs where possible. Partially based on information provided from the teacher preparation program constituency, revisions to HEA Title II data collection were developed and are reflected in this information collection.

The reporting associated with this collection is divided into burden to IHEs under the IPRC and States under the SRC.

Section 103(20) of the HEA defines “State” to include nine locations in addition to the 50 States: the Commonwealth of Puerto Rico, the District of Columbia, Guam, American Samoa, the United States Virgin Islands, the Commonwealth of the Northern Mariana Islands, the Freely Associated States, which include the Republic of the Marshall Islands, the Federated States of Micronesia, and Republic of Palau. For this reason, all reporting required of States explicitly enumerated under §205(b) of the HEA apply to these 59 States.

Annual burden hours for state respondents on the State Report Card (SRC): 242 hours

These proposed revisions change the estimated burden from a previous estimate of 250 hours to a new estimate of 242 hours for States to report on the SRC. The respondents for SRC are 59 U.S. States and jurisdictions, reporting annually. The SRC will continue to collect data in the aggregate at the institution or entity level on number of participants served in traditional and alternative route teacher preparation programs and by program for non IHE-based alternative routes at the program level.

The estimated mean cost per hour of state staff assigned to this task is approximately \$31, according to the Bureau of Labor Statistics (BLS) at <http://www.bls.gov>, for an estimated total cost of \$7,502 for a State to complete and submit the SRC.

Annual burden hours for IHE and Teacher Preparation Program respondents on the Institution and Program Report Card (IPRC): 146 hours

This request changes the IPRC burden hours due to an increase in teacher preparation programs. There were 1,721 IHEs providing traditional and/or alternative route teacher preparation programs leading to state teaching credentials and teacher preparation programs outside of IHEs reporting on the IPRC in 2016 and in 2018, there were 1,735. This results in an increase of 14 entities affected.

An error was discovered in the 2016 burden calculation. It was reported that the total burden for the IPRC was 266,016 when it should have been reported as 251,266 (146 X 1,721). Because the IPRC is the same instrument, the burden remains at 146 hours per IHE or non IHE-based teacher preparation program respondent will be required to assemble, check, and report on the IPRC for traditional or alternative route teacher preparation programs to state authorities. However, there is an increase in 14 teacher preparation programs resulting in a total burden 253,310 (146 X 1,735) hours. The actual result is an increase of 2,044 burden hours while there will be a decrease in the request for burden hours of 12,706 hours due to the previous error.

Table 1: Revised Estimates for HEA Title II IPRC and SRC Burden Hours

| Report Card | Number of Respondents | Burden hours per Instrument | Proposed Burden Hours | Change in Burden Hours |
|------------------------------|------------------------------|------------------------------------|------------------------------|----------------------------------|
| IPRC | 1,735 | 146 | 253,310 hours | Reduction of 12,706 hours |
| SRC | 59 | 4.10 | 242 hours | Reduction of 8 hours |
| Combined IPRC and SRC | 1,794 | 150.1 | 260,852 hours | Reduction of 12,714 hours |

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

Apart from the costs reflected in the latter part of item 12 and in item 14, there is no additional cost burden to respondents or record keepers resulting from the collection of information.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The annualized cost to the Federal government will be approximately \$850,000. This includes the equivalent of one senior officer staff time, a contract officers' representative (COR) and the cost of employing a contractor to refine and maintain the data collection Report Cards, collect, tabulate and analyze the data, support the Title II Web site for perpetual access, and prepare drafts of the Secretary's annual report on the quality of teacher preparation programs and state requirements for teacher credentials based on the data collection findings. Additionally, the contractor provides technical assistance to 59 states and 1,735 institutions and non IHE-based teacher preparation programs for implementation and maintenance of the electronic reporting system and the collection of accurate and complete data annually.

15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).

The program revisions presented in this justification result from a better alignment with the statutory requirements. While no changes have occurred in the requirements of data collection,

changes to the instruments are being made that will provide clarity and improve data quality; and other minor revisions to better align them with statutory requirements.

The requirements reflected in this information collection would lead to an improvement in publicly available information on the effectiveness of teacher preparation programs and would aid prospective students in selecting programs, employers making employment determinations to teacher preparation program graduates, States in making funding decisions, and teacher preparation programs determining areas needed for improvement.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The Secretary of Education submits an annual report to the Congress each year through the Department's Title II program. The Title II program receives information from States on the State Report Card (SRC) and prepares and analyzes the information for presentation to Congress within a year of the SRC reporting deadline of October 31. The State collects information on teacher preparation entities and programs using the Institution and Program Report Card (IPRC) or other form, if the State prefers. There are no complex analytical techniques applied to the data as descriptive statistics are generally used accompanied by explanatory text. All Title II Reports are published on the Department's web page at <http://www2.ed.gov/about/reports/annual/teachprep/index.html> and on the Department's HEA Title II program web site at <https://title2.ed.gov/Public/Home.aspx>

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

OPE will display the expiration date for OMB approval of the information collection on the first page of the annual SRC, the annual IPRC and the User Manuals.

18. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.

There are no exceptions to the statement.