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Supporting Statement for OMB Clearance Request

Part A: Justification

Study of District and School Uses of Federal Education Funds

Submitted to:

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Introduction

This information clearance request is for a study to examine targeting and resource allocation for five major federal education programs: Part A of Titles I, II, III, and IV of the *Elementary and Secondary Education Act (ESEA)* — including school improvement grants provided under Section 1003 of Title I, Part A — as well as Title I, Part B of the *Individuals with Disabilities Education Act (IDEA)*. The study will also collect information on the allocation of funds provided under the Education Stabilization Fund (ESF) authorized under the Coronavirus Aid, Relief, and Economic Security Act (CARES Act).

More specifically, the study will collect detailed fiscal data from a nationally representative sample of 400 school districts, including budgets, plans, expenditure data, and personnel and payroll data. In addition, the study will collect data on allocations to districts and schools to examine how the distribution of funds varies in relation to program goals and student needs; survey district and school officials to explore such issues as the types of services and resources that are provided through the federal funds, coordination across programs, and use of flexibility; conduct interviews in nine site visits to districts to obtain more in-depth data; and analyze other existing fiscal data collected by the National Center for Education Statistics.

This package is the first of two OMB clearance requests for this study. This package requests approval for selection and recruitment of nationally representative samples of school districts and schools and collection of certain preliminary information from states (i.e., lists of subgrantees and suballocation amounts for each program, contact information for district program coordinators for each of the covered *ESEA* programs, and the state chart of accounts). A future submission will request clearance for the data collection instruments for this study. We anticipate beginning the collection of state subgrantee lists and other preliminary information in May 2020 and launching the district- and school-level data collection in January 2021.

This package contains two major sections:

1. Supporting Statement for Paperwork Reduction Act Submission
 - Justification (Part A)
 - Description of Statistical Methods (Part B)
2. Appendices
 - Appendix A: Notification letters
 - Appendix B: Request for data – State suballocations and other data

A. Justification

1. Circumstances that make the collection of information necessary

Federal education programs administered by the U.S. Department of Education provide over \$40 billion annually to support elementary and secondary schools and their students. These programs include a great deal of flexibility over the types of interventions and services that are provided at the district and school levels, and policymakers and educators are often interested in understanding where the money goes and what it buys. Evaluations of individual programs provide information on the types of services that are supported under each program, typically based on surveys of educators who deliver those services at the district and school levels – but fiscal data can provide a more detailed, concrete, and objective information on the amounts of funds allocated for various purposes as well as how funds are distributed among grantees. To collect this type of data in an efficient manner, the U.S. Department of Education has periodically conducted cross-cutting studies that examine the targeting and uses of funds across multiple federal programs.

The reason for conducting cross-cutting studies that examine resource allocation across multiple federal education programs is two-fold. First, collecting and analyzing resource allocation data is a complex task, and it is more cost-efficient to collect such data for multiple programs. Second, examining resource allocation and use across multiple programs will allow for comparison and contrast between these programs as well as for summarizing the data across the programs. Although each federal education program has unique goals and provisions, they often allow funds to be used for similar or inter-related purposes and services (e.g., professional development) or overlapping populations (e.g., students with a specific learning disability served under *IDEA* and educationally disadvantaged students served under Title I of *ESEA*). In addition, Title I schoolwide programs permit schools to combine or coordinate the use of Title I funds with other funds, including other *ESEA* programs and state and local funds. By collecting and analyzing data across five of the largest federal programs supporting elementary and secondary school education, this study will provide a comprehensive picture of how districts and schools are using a variety of federal funding sources to meet the varied needs of their students.

The most recent cross-cutting studies of resource allocation under federal education programs were completed in 2009¹ and 2000² based on data collected for the 2004-05 and 1997-98 school years. Those data are now at least 14 years old; moreover, they reflect programs and provisions that existed prior to the 2016 reauthorization of *ESEA* and do not include programs authorized under *IDEA*. This new study will provide updated information and will provide a first-time look at how the uses of *IDEA* funds relate to the uses of *ESEA* funds.³

¹ The National Longitudinal Study of No Child Left Behind included a component that examined targeting and resource allocation in the 2004-05 school year for five *ESEA* programs (Title I, Part A, including funds reserved for school improvement under Section 1003; Reading First; Comprehensive School Reform; Title II, Part A; and Title III, Part A) as well as Perkins Vocational Education State Grants.

² The Study of Education Resources and Federal Funding examined targeting and resource allocation in the 1997-98 school year for five *ESEA* programs (Title I, Part A; Title II; Title III, Section 3132; Title IV; and Title VI), as well as Goals 2000.

³ *IDEA* Grants to States constitute the Department's second largest program supporting elementary-secondary education, after Title I of *ESEA*, and, as noted above, *IDEA* and Title I funds often provide educational support to the same students. In addition, because Title I and some other federal funds are often used for schoolwide programs, and students with disabilities are often educated in inclusive settings, local educators may appropriately consider how to use both *IDEA* and *ESEA* funds to meet the varied yet sometimes inter-related needs of at-risk

Funding for the five programs covered in this study amounts to a total of \$33 billion, or about 80 percent of total funding for the Department’s elementary-secondary programs (Exhibit 1). Given the significant investment in these programs, it is important to understand how the funds are distributed, how districts and schools use the funds, and the uses and limitations of flexibility provisions for effectively serving their students.

Exhibit 1. Programs included in study, with FY 2020 funding levels

Program Name	FY 2020 Appropriation
ESEA Title I, Part A: Title I Grants to Local Educational Agencies	\$16,309,802,000
ESEA Title II, Part A: Supporting Effective Instruction State Grants	2,131,830,000
ESEA Title III, Part A: English Language Acquisition State Grants	787,400,000
ESEA Title IV, Part A: Student Support and Academic Enrichment Grants	1,210,000,000
IDEA Title I, Part B: Grants to States	12,764,392,000
Total	\$33,203,424,000

In addition, the study will also collect information on state suballocations for certain funds provided through the Education Stabilization Fund (ESF) authorized under the CARES Act – the Elementary and Secondary School Emergency Relief Fund (ESSER) and Governor’s Emergency Education Relief Fund (GEER). In the wake of the coronavirus pandemic, these two funding streams are providing over \$16 billion in emergency support to school districts and other subgrantees, and the suballocation data will provide information on how those funds have been distributed.

The study is being carried out under the authority of Section 8306(a)(4) of the *Elementary and Secondary Education Act (ESEA)* and Section 76.591 of the U.S. Department of Education General Administrative Regulations.

2. How the information will be collected, by whom, and for what purpose

Study Purpose

This study will examine the distribution and uses of federal education funds⁴ under five major programs authorized under *ESEA* and *IDEA*. Specifically, the study will address the following research questions:

- 1. What do federal programs add?** How much do the federal programs in this study increase the level of per-pupil funding over what is provided through state and local sources? What share of total funding is provided through federal programs, both overall and for specific types of students and services or resources?
- 2. Where does the money go?** To what extent are federal funds reaching the districts and schools with the greatest needs?
- 3. What does the money buy?** How do districts and schools use federal funds, and what specific services and resources are provided through these funds?

students.

⁴ For most research questions regarding the distribution and uses of federal education funds, the study will focus specifically on the five programs listed in Exhibit 1. However, some questions will be addressed based on National Center for Education Statistics (NCES) data on total federal, state, and local revenues.

4. **How do federal programs support and/or restrict district and school flexibility over use of the funds?** How do districts and schools use existing flexibilities?

Study Methods

To answer the above research questions, the study will make use of extant data and documents, resource allocation data, district and school surveys, and site visits.

- **Extant data and documents.** The study will collect four types of extant information from states:
 - **State suballocations of federal program funds.** All states will be asked to provide data on their suballocations to school districts, educational service agencies (ESAs), and other entities for the five programs included in this study, including suballocations for School Improvement Grants made from funds reserved under Section 1003 and suballocations for Title III Immigrant Subgrants. States will also be asked to report their suballocations from the Elementary and Secondary School Emergency Relief Fund (ESSER) and Governor's Emergency Education Relief Fund (GEER) under the CARES Act. The data collection instrument is included in Appendix B.
 - **State chart of accounts for 2019-20.** In order to facilitate the district-level collection of fiscal data, we will ask each state to provide its chart of accounts, which define the accounting categories that districts are to use for tracking and reporting their revenues and expenditures. These charts of accounts will be used to create, for each state that is represented in the district sample, an Excel workbook that has been customized to the accounting codes and conventions used in their state (data collection instrument included in Appendix B).
 - **School-level expenditure data.** States are required to make publicly available, on the SEA website, district and school report cards that include school-level expenditure data. The study team will attempt to harvest these data from SEA websites. For states that do not have such data on their website, or in cases where the individual school-level expenditure data are not machine readable, the study team will ask the state to provide these data in an Excel file or other machine readable format.
 - **District grant applications for the covered programs.** To minimize burden on school districts, we will ask states to provide these applications for districts that are included in the study sample. (If any state does not provide these, then we will request them from the individual districts.)

In addition, the study will utilize extant data on district- and school-level revenues and expenditures from the National Center for Education Statistics (NCES) School District Finance Survey (F-33) combined with demographic variables from the Common Core of Data (CCD). (These data will be obtained from NCES and will not impose any additional burden on the public.)

- **Resource allocation data.** The study will collect detailed fiscal data on the uses of federal education funds, including program budgets and plans, expenditure data, and personnel and

payroll data⁵, from the nationally representative sample of school districts. The team will ask district staff to provide these data for both the district at large and for the individual schools included in the sample. Data will be collected via an Excel workbook that has been customized to the accounting codes and conventions used in each state. Districts will also be given the option to submit the data in a format of the respondent's choosing that the study team can adapt to the workbook.

- **District and school surveys.** The team will ask districts and schools in the sample to complete a survey that provides more nuanced information about their use of federal funds. The study will administer surveys to district administrators and school principals to supplement the fiscal data on how they use federal funds and how they use available flexibility and coordinate the uses of funds from different funding sources.
- **Site visits.** In nine sites, the study team will conduct in-person interviews with appropriate district and school staff to obtain detailed information on resource allocation practices and patterns. Prior to site visits, the study team will collect the survey data relevant to each district and asked staff at selected sites to gather documentation describing their programs. Site visitors will bring the survey results for individual case study sites to the interviews so that the interviews can build upon the survey information and probe for additional detail about the practices and issues identified in the survey.

The suballocation data, resource allocation data, and other fiscal data will be collected for three consecutive school years (2019-20, 2020-21, and 2021-22) in order to examine how district funding and spending patterns have changed during and after the pandemic and economic shutdown. The surveys and case studies will be conducted for a single school year (2020-21).

Exhibit 2 below provides a matrix showing a more detailed set of research questions and indicating which data sources will be used to address each of these questions.

⁵ Personnel data are generally available to the public but not readily accessible online.

Exhibit 2. Research questions by data source

Research Questions	Fiscal/ Personnel I Data	Surveys	Site Visits	State Extant Data & Documents	NCES Data
1. What do federal programs add? How much do federal programs increase school funding levels, both overall and for specific types of districts, schools, students, and services?					
a. How much do federal programs add to total per-pupil funding, and how does this vary across district and schools?					1
b. What is the share of total district and school funding provided through federal programs, and how does this vary by district and school characteristics?					1
c. How has funding at the state and district changed over time?					1
d. How much is spent on services for EL students, and what share of that comes from various funding sources?	2	1			
e. Are different funding sources focused on different subpopulations of EL students (such as long-term ELs, recently arrived ELs, and EL students with interrupted formal education (SIFE))?		1	2		3
f. How much of the Title III funds are allocated through immigrant subgrants?				1	
g. What share of total funding for special education services is provided through federal funds?	1	?			
h. What share of total district expenditures for prekindergarten and kindergarten are provided through federal funds?	1	2			
i. What share of total expenditures on professional development and technology are provided through federal funds? What are other major funding sources for professional development and technology?	1	2			
j. How are districts addressing the revised requirements for ensuring that Title I funds supplement, not supplant the state and local funds provided to schools?		1	2		
2. Where does the money go? To what extent are federal funds reaching the districts and schools with the greatest needs?					
a. How does the distribution of federal funds among districts vary by poverty, urbanicity, and other characteristics?	2			1	
b. How does the distribution of federal funds among schools vary by poverty, urbanicity, and other characteristics?	1				2
c. Have funding patterns changed over time?					1
d. How does the distribution of federal funds compare to the distribution of state and local funds?				1	
e. What share of federal funds are used at the state-, district-, and school-levels? To what extent do districts distribute federal funds to schools vs. maintain them at the district-level?	3			2	1
f. How much of the funds are allocated to charter schools?	1	2		1	
g. How do states suballocate federal funds to the district-level? For states with educational service agencies (ESAs), who receives the money – the state, the district, or a hybrid?				1	
h. How much do states set aside for school improvement activities under Section 1003, and how do they distribute those funds? To what extent do they make formula or				1	

Research Questions	Fiscal/ Personnel Data	Surveys	Site Visits	State Extant Data & Documents	NCES Data
competitive subgrants? How do states meet Section 1003 requirements regarding prioritization and geographic diversity? How much is awarded to schools identified for comprehensive vs. targeted support and improvement?					
i. How do districts allocate Title I Part A and Section 1003 funds to the school-level?	2	1			
3. What does the money buy? How do districts and schools use federal education funds, and what specific services and resources are provided through these funds?					
a. For the five programs included in this study, how much of the funds are used for instruction, instructional support, student support, and program administration?	1				
b. What proportion of funds is spent on salaries and benefits for teachers, aides, related service providers, administrators, and other staff?	1				
c. How much is used for specific types of programs and services such as professional development, extended-time programs, preschool and kindergarten, technology for student use, and parent involvement?		1	2		
d. To what extent are the funds used for professional development in specific subject areas such as reading/language arts, mathematics, and science? To what extent are the funds used for development activities for teachers, for school leaders, and for other types of staff? What types of professional development activities are supported?		1	2		
e. How does the use of school improvement grants provided under Section 1003 of Title I, Part A compare with the use of regular Title I grants?	2	1	3		
4. How do federal programs support and/or restrict district and school flexibility over use of the funds? How do districts and schools use existing flexibilities?					
a. In what ways do districts and schools have flexibility over how they use federal funds?		1	2		
b. Are there barriers to using existing flexibility? Are there areas in which they perceive a need for greater flexibility?		1	2		
c. How are districts and schools leveraging funding from different federal programs to meet the needs of students?		1	2	3	
d. To what extent do districts and schools coordinate or combine funds from different federal, state, and local sources?		1	2	3	
e. To what extent are Title II, III, IV, and IDEA funds used to support schoolwide programs under Title I? How do schoolwide programs combine or coordinate these funds to support the goals of the individual programs?		1	2		
f. How do the uses of federal funds relate or interact to the uses of state and local funds in schools?		1	2		
g. To what extent do districts use the transferability and Rural Education Achievement Program (REAP-Flex) authorities to transfer funds between federal education programs? What do they transfer funds from and to?		2	3	1	

3. Use of technology to reduce burden

The study team will make use of the following information technologies and methods to maximize data collection efficiency and minimize respondent burden:

- **Electronic collection of extant data from states.** The study team will ask states to provide links to online data where available (i.e., suballocation data, school-level expenditure data, and grant applications). Items that are not published online will be collected via email.
- **Resource allocation data will be collected via an Excel-based workbook.** This workbook will be accompanied by detailed instructions, an informational webinar, a frequently asked questions (FAQ) guide, and contact information for a study team member who has regional expertise and will reply to all communications within 24 hours.
- **Electronic surveys.** Survey data collection will be conducted using a Web-based platform to streamline the response process. Respondents also will have the option to access a PDF version of the web-based survey that they can download and print if needed. The district survey will use a modular approach to divide the response burden among those with responsibility and expertise for different programs (i.e., a Title I module, a Title II module, etc.). The surveys will include skip patterns that will save respondents time by presenting them only with the questions that are relevant to them. This approach also will minimize data entry error and the need to follow up with respondents.

4. Efforts to avoid duplication of burden

All of the federal education programs included in this study are also the subject of other ongoing NCEE studies. NCEE staff and contractors for the various studies are working closely together to ensure that there is no duplication of burden. For example, the subgrantee lists collected by this study will be shared with the Title III and Title IV study teams for use in sample selection and outreach. Fiscal data collected through this study will not be collected under the other NCEE studies of these programs. The design of survey instruments and interview protocols will be coordinated to limit overlap or duplication. In addition, the study will use extant data where available, including the NCES School District LEA Finance Survey (F-33), the Common Core of Data Universe Surveys, SEA grant applications, and school expenditure data collected by SEAs.

5. Methods used to minimize burden on small businesses or other small entities

No small businesses will be involved as respondents. Every effort will be made to minimize the burden on respondents.

6. Consequences of less-frequent data collection

This study is designed to collect detailed fiscal data, in combination with survey and interview data that are focused on resource allocation issues, in order to help policymakers and educators better understand how federal funds are allocated and used at the district and school levels. Although the five programs in this study account for four-fifths of federal funding for elementary and secondary

education, detailed fiscal data have not been collected on most of these programs since 2004-05.⁶ The data from the Department's last cross-cutting study of resource allocation are now 14 years old and reflect *ESEA* programs and provisions that existed prior to the 2016 reauthorization. For *IDEA*, which was not included in the 2004-05 cross-cutting study, the most recent collection of detailed fiscal data was conducted by the Center for Special Education Finance (CSEF), which was discontinued in 2004. Choosing not to conduct this data collection at this point in time would leave policymakers, educators, and the public with very dated information about the distribution and uses of federal funds in school districts and schools across the nation. In addition, because previous studies were conducted prior to the most recent reauthorizations of *ESEA* and *IDEA*, a consequence of not conducting the proposed study is that available information on the uses of federal education funds will not reflect current policy goals and priorities.

7. Special circumstances

None of the special circumstances listed apply to this data collection.

8. Federal Register announcement and consultation

a. Federal register announcement

The 60-day notice to solicit public comments was published in Volume 84, Number 247, page 70964 of the *Federal Register* on December 26, 2019. Public comments were received and addressed within the attached comment response summary.

b. Consultations outside the agency

A Technical Working Group (TWG) of expert researchers and practitioners will be formed to provide feedback on the study design, data collection instruments, analysis methods, and reporting. The study team will review and consider all input from this group (and others who provide comments) and revise the design and methods as appropriate.

9. Payment or gift

No payment or gift will be provided to state, district, or school staff who participate in this study.

10. Assurances of confidentiality

Other than the names and contact information for the survey respondents, which is information typically already available in the public domain (i.e., state, district, and school websites), no data collected for surveys will contain personally identifiable information. No names and contact information will be released.

⁶ Fiscal data were more recently collected for the Title I Part A program as part of the Department's study of Title I schoolwide and targeted assistance programs, which collected such data for 2015-16. However, that study focused on comparing school-level uses of funds between schoolwide programs and targeted assistance programs and did not provide a holistic picture of all local uses of Title I funds; also, it did not include Title I funds provided through School Improvement Grants under Section 1003.

Responses will be used for research or statistical purposes. The following language will be included on the district and school surveys under the Notice of Confidentiality:

Information collected for this study comes under the confidentiality and data protection requirements of the Institute of Education Sciences (The Education Sciences Reform Act of 2002, Title I, Part E, Section 183). Responses to this data collection will be used only for statistical purposes. The reports prepared for the study will summarize findings across the sample and will not associate responses with a specific district or individual. We will not provide information that identifies you or your district to anyone outside the study team, except as required by law.

Extant data and documents to be collected from states are public information and therefore we are not promising to keep those data confidential. However, individual respondents will not be identified.

The Education Sciences Reform Act of 2002, Title I, Part E, Section 183 of this Act requires, “All collection, maintenance, use, and wide dissemination of data by the Institute” to “conform with the requirements of section 552 of title 5, United States Code, the confidentiality standards of subsection (c) of this section, and sections 444 and 445 of the General Education Provision Act (20 U.S.C. 1232g, 1232h).” Respondents will be assured that confidentiality will be maintained, except as required by law.

Specific steps to protect confidentiality include the following:

- Identifying information about respondents (e.g., respondent name, address, and telephone number) will not be entered into the analysis data file, but will be kept separate from other data and will be password protected. A unique identification number for each respondent will be used for building raw data and analysis files.
- In public reports, findings will be presented in aggregate by type of respondent or for subgroups of interest. No reports will associate information with any individual, school, or district.
- Access to the sample files will be limited to authorized study staff only; no others will be authorized such access.
- All members of the study team will be briefed regarding confidentiality of the data.
- Most data will be entered via the web systems. However, a control system will be established to monitor the status and whereabouts of any hard copy data collection instruments during data entry.
- All data will be stored in secure areas accessible only to authorized staff members. Computer-generated output containing identifiable information will be maintained under the same conditions.
- Hard copies containing confidential information that is no longer needed will be shredded.

11. Justification for sensitive questions

The survey questionnaires and interview protocols will not include questions of a sensitive nature.

12. Estimate of burden hours for respondents

The burden hours estimate contained in this OMB package is solely for collection of certain preliminary information needed from states, including: a) subgrantee lists including suballocation amounts for each of the federal programs covered in the study for federal fiscal years 2019, 2020, and 2021 (i.e., for the 2019-20, 2020-21, and 2021-22 school years); b) contact information for LEA coordinators for each of the federal programs; and c) the state chart of accounts for 2019-20. This information will be requested from all 50 states and the District of Columbia. Provision of these data is expected to require one hour for each of the five federal programs covered in the study (to provide the subgrantee lists and LEA contact information) for each of the three years, one hour to provide the ESF suballocation data, and one hour to provide the state chart of accounts. The burden hour estimates assume that the ESEA and IDEA federal program data will be provided by five separate state coordinators (one for each program), although in some cases there may be coordinators who handle multiple federal programs, that ESF suballocation data and LEA contact information will be provided by a sixth state staff member, and that the state chart of accounts will be provided by a seventh state staff member. This amounts to an estimated total of 408 state respondents and 1,020 labor hours (including 918 hours for the ESEA and IDEA suballocations, 51 hours for the ESF suballocations, and 51 hours for the state chart of accounts, as shown in Exhibit 3). There are no marginal monetary costs to respondents for this activity. Based on an average labor cost of \$45 per hour, the cost burden for this information collection is estimated as \$45,900.

A future OMB submission will request clearance for additional data from states (grant applications for sample districts; school-level expenditure data in states that have not provided this on their SEA website), as well as the district and school surveys and case study interview protocols. The burden estimates associated with those instruments will be included in that future submission.

Exhibit 3. Burden estimates for data collection

Respondent category	Number of respondents	Estimated burden per respondent	Total burden hours	Total cost burden
Suballocation data (50 states and D.C.)				
<ul style="list-style-type: none"> SEA fiscal data provision (suballocation data for ESEA and IDEA programs; contact information for LEA program coordinators), for three school years 	306	3 hours	918	\$41,310
<ul style="list-style-type: none"> SEA suballocations and LEA contacts for ESF funding 	51	1 hour	51	\$2,295
<ul style="list-style-type: none"> State chart of accounts 	51	1 hour	51	\$2,295
Subtotal	408		1,020	\$45,900
Fiscal and personnel data (400 districts)				
<ul style="list-style-type: none"> Grant applications for sample districts; school-level expenditure data if not available on SEA website 				*
<ul style="list-style-type: none"> LEA fiscal and personnel data provision 				*
Survey respondents (400 districts, 1,500 schools)				
<ul style="list-style-type: none"> LEA federal programs coordinators 				*
<ul style="list-style-type: none"> School principal or designee 				*
Case study respondents (9 districts, 36 schools)				
<ul style="list-style-type: none"> District staff (CFO, special programs leader, federal program leader and individual program coordinators) 				*
<ul style="list-style-type: none"> Documentation of programs and activities, collection and sharing with researchers 				*
<ul style="list-style-type: none"> School staff (principal, business officer, instructional leader) 				*

Note: Asterisk indicates burden estimates that will be provided in a subsequent OMB submission.

13. Estimated cost burden for respondents

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

14. Annualized costs to the federal government

The total cost to the federal government for this study is \$1,640,687. The annualized cost over five years is \$328,137.

15. Program changes in burden/cost estimates

This request is for a new information collection.

16. Plans for tabulation and publication

The study will culminate in a cross-cutting final report that provides a comprehensive overview of the study's findings and includes comparative analyses across programs, as well as six program-specific evaluation briefs that summarize findings for each of the programs in the study (including a separate brief on School Improvement Grants under Section 1003 of Title I). The final report is scheduled for completion in Spring 2024 and the program-specific briefs are scheduled for completion in Summer 2024.

The study team will use descriptive methods to tabulate the data. For district and school survey data, the study will report weighted means for survey variables and unweighted means from extant sources such as CCD where data exist for nearly all districts. Weights will reflect the probability of selection for districts and schools, with adjustments for survey nonresponse.

The study will include subgroup analyses to provide additional information about how funding varies within and across various school level characteristics. For example, the study will document (and statistically test for) differences between rural and urban public schools in how they support children with disabilities. The study will also examine funding breakdowns by school level and topics applicable only to specific school levels, such as preschool inclusion for elementary schools or post-high school transition planning for secondary schools.

Study reports will use plain language and design graphical displays to be understandable to a broad audience of policymakers and practitioners. The final report and program-specific briefs will be no longer than 15 pages, follow the NCES Statistical Standards (2002) and IES Style Guide (2005), and comply with Section 508 accessibility requirements.

17. Expiration date omission approval

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

18. Exceptions to the certification statement

Not applicable. There are no exceptions requested.