

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
Chesapeake Bay Watershed Environmental Literacy Indicator Tool
OMB Control No. 0648-0753

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

The Chesapeake Bay Watershed Environmental Literacy Indicator Tool (ELIT) was developed to monitor public school districts' capacity and progress towards meeting the environmental literacy goal of the 2014 Chesapeake Bay Watershed Agreement (<http://www.chesapeakebay.net/documents/ChesapeakeBayWatershedAgreementFINAL.pdf>): "Enable every student in the region to graduate with the knowledge and skills to act responsibly to protect and restore their local watershed." The signatories of the Agreement included the mayor of the District of Columbia and the governors of the states of Delaware, Maryland, New York, Pennsylvania, Virginia, and West Virginia.

The ELIT will monitor public school districts' progress towards two outcomes of the Agreement:

1) Student Outcome:

Continually increase students' age-appropriate understanding of the watershed through participation in teacher-supported, meaningful watershed educational experiences (MWEEs) and rigorous, inquiry-based instruction, with a target of at least one meaningful watershed educational experience in elementary, middle, and high school, depending on available resources.

2) Environmental Literacy Planning Outcome:

Each participating Bay jurisdiction should develop a comprehensive and systemic approach to environmental literacy for all students in the region that includes policies, practices and voluntary metrics that support the environmental literacy Goals and Outcomes of this Agreement.

The National Oceanic and Atmospheric Administration (NOAA), on behalf of the Chesapeake Bay Program, will ask the state education agencies for Maryland, Pennsylvania, Delaware, Virginia, West Virginia, and the District of Columbia to survey their public school districts to determine progress toward these two outcomes, as well as areas where public school districts may need additional support:

- 1) student participation in MWEEs during the school year (Outcome 1),
- 2) school district capacity to implement a comprehensive and systemic approach to environmental literacy education (Outcome 3), and

- 3) school district needs to support improvements in environmental literacy education.

In addition to monitoring progress on the environmental literacy goal of the Chesapeake Bay Watershed Agreement, the information collected will inform several Chesapeake Bay Program partner agencies' work to support the school districts' environmental literacy education efforts.

Public school district representatives will be asked to complete the ELIT survey on the status of their school district on a set of key indicators for the four areas listed in Question 1 above (see ELIT, Attachment 1). One representative from each school district's administration is asked to complete this survey once every two years. Respondents will submit their information electronically on web-based survey forms.

ELIT data collection will begin on June 1, 2021, and remain open through October 2021. Data will be analyzed and summarized in fall 2021 and presented publicly in winter/spring 2021-22. The same timeline will be followed for the 2023 data collection.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

The results of the biennial ELIT survey will be analyzed and reported to the internal stakeholders of the Chesapeake Bay Watershed Agreement. Participating states will receive a summarized report of findings for the full watershed, a summary of findings for their state, and comparisons of results between states. These aggregated results will be used by the state agencies to understand progress of their school districts over time, and to inform decision-making about strategies and priorities for future work with school districts.

The biennial reporting will also be used by the Chesapeake Bay Program to understand progress of school districts in the watershed, understand differences between jurisdictions, and guide strategy for providing targeted support in each state.

State agencies and other stakeholders will also have access to the responses of each public school district, which they will use to customize outreach and support to a particular school district, based on their status and needs.

Beyond the internal stakeholders, aggregated results from the ELIT survey will be made available for public use in these formats:

- 1) Results will be summarized on the Engaged Communities page of the publicly-available ChesapeakeProgress website (<http://www.chesapeakeprogress.com/engaged-communities#environmental-literacy>), which is designed to help oversight groups track the progress toward the Chesapeake Bay Watershed Agreement goals.
- 2) A Summary Report (PDF) will be produced and made available for download on the Chesapeake Bay Program website.
- 3) Chesapeake Bay Program staff will include a selection of results in presentations

delivered at relevant education-focused professional conferences.

It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information. NOAA's Chesapeake Bay Office will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable NOAA Information Quality Guidelines for objectivity, utility, and integrity (http://www.cio.noaa.gov/services_programs/IQ_Guidelines_103014.html). Prior to dissemination, the information will be subjected to quality control measures and a pre-dissemination review pursuant to Section 515 of Public Law 106-554.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

The ELIT data collection will be electronic. School district respondents will receive email prompts to complete the online instrument accessed through Qualtrics, an online survey platform. The Qualtrics ELIT will have built-in "logic" prompts so respondents complete only items relevant to their location and experience. Data will be stored on Qualtrics' server and then downloaded by NOAA. The proposed data collection process minimizes costs, while also being sensitive to issues of respondent burden, accuracy, and efficiency. Due to the nature of their administrative roles within public school districts, it is assumed that all respondents will have access to the Internet at work, where they will also have access to the information needed to complete the survey. In addition, it is likely that respondents would have additional routes to complete the survey, including internet access at home, on a smartphone, or at a public institution such as a local library.

4. Describe efforts to identify duplication.

There are no similar data collections in progress.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

An iterative review process, which included critical review of survey items by school district representatives, was used to eliminate any non-essential questions from the ELIT and to ensure question parameters were limited to information that is readily known or attainable by prospective respondents. This effort has kept the instrument as streamlined as possible while ensuring that sufficient data is collected to assess progress towards the environmental literacy goal.

To minimize time spent completing the online form, respondents will be provided with a Word copy of the questions so they can research responses before starting the online ELIT.

6. Describe the consequences to the Federal program or policy activities if the collection is

not conducted or is conducted less frequently.

If the data were not collected, the Chesapeake Bay Program would not fulfill its responsibility to monitor progress towards the goals of the 2014 Chesapeake Bay Watershed Agreement, nor would it be able to develop support strategies that are most targeted to the needs of the school districts it serves.

The Agreement specifies the review and updating of strategies related to these outcomes every two years. The primary purpose of the data is to inform this revision and decision-making, so the ELIT data collection must coincide with this process and cannot be executed less frequently.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

The collection will be conducted in a manner consistent with OMB guidelines.

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 instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice published on December 26, 2019 (84 FR 70956-70957) solicited public comments. One comment was received. The nature of this comment was not directly related to the ELIT Survey and instead focused on the need for additional policy to address the poultry industry's impact on the health of the Chesapeake Bay.

The ELIT was developed in consultation with representatives from the state education agencies and other partners who are part of the Chesapeake Bay Program's Environmental Education Workgroup, with support from an external evaluation firm to guide the process and develop the tool. The process included, as noted above, an external review by school district representatives on the feasibility of the data collection method and specific information requested, and subsequent revision of the ELIT survey. In addition, the states' departments of education led a data collection effort and distributed a version of the ELIT questions in their own 2015 survey. Respondents to that survey were asked how difficult it was to provide requested data. In response to the question, "On a scale from 1 to 10, how difficult was it to provide the data for the survey overall? (1=Very difficult, 10=Very easy)," the mean response from 265 respondents was 4.9 (SD=2.3). In response to the open-ended question, "Do you have any suggestions for improving the design and/or functionality of the survey?" 71 respondents provided suggestions, which were reviewed and addressed. The most common difficulty was that a more appropriate respondent in the district be found; this suggestion was mainly the result of one state that distributed to teachers, when it is most easily completed by a district-level staff person. The proposed ELIT data collection invitation materials and recruitment process offer suggestions as to who would be

the right staff person to complete the questions. The other most common suggestion was to shorten the survey and eliminate redundancy, including eliminate questions that are available from public data sources; this suggestion was addressed by excluding questions that can be obtained through public sources (e.g., sustainable schools certification, whether the school district was in the watershed, enrollment data), and limiting additional questions from state agencies to three questions. Other suggestions included having the survey open during the autumn, to allow easier completion, which was accommodated in the ELIT data collection plan.

The proposed ELIT will collect feedback from the respondents about difficulty to complete the survey.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

Payments or gifts from federal agencies are not provided to respondents. Some state education agencies, which will facilitate the data collection, may opt to use incentives as appropriate to their state and contexts.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

Assurance of confidentiality is not provided to respondents. No personally identifiable information will be collected from the respondents; thus, the Privacy Act does not apply to this data collection.

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.

No questions of a sensitive nature are asked on the ELIT.

12. Provide an estimate in hours of the burden of the collection of information.

The ELIT will be distributed to all public school districts in the District of Columbia, Delaware, Maryland, Pennsylvania, Virginia, and public school districts within the Chesapeake Bay Watershed in West Virginia for a total of 685 public school districts (see Table 1).

Table 1. Number of Public School Districts by State

State	Number of Public School Districts
DC	1
DE	16
MD	24
PA	499
VA	137
WV	8
Total	685

* West Virginia only distributes the survey to the 8 districts within the Chesapeake Bay

Watershed, because the vast majority of the state is outside of the watershed.

A 50% response is expected for the school districts as a whole. This response rate is estimated based on the 2017 and 2019 collections of the ELIT, in which response rates were steady at around 30% in each iteration. Response rates are significantly higher among districts within the watershed (over 40%), and vary greatly by state, depending on the infrastructure for reaching LEA administrators. Some states with few, large LEAs had a 100% response rate (Maryland), while states with smaller, distributed LEAs (e.g., Pennsylvania) are harder for state education officials to reach. Strategies are being put in place for future ELIT data collection to attempt to increase the response rate in an effort to encourage at least half of LEAs to respond.

One respondent from each public school district will be asked to submit a completed ELIT form every other year (2021 and 2023), thus the annualized number of potential respondents is 457. With a 50% response rate, the annualized number of responses over three years is therefore 229.

Information Collection	Type of Respondent (e.g., Occupational Title)	# of Respondents (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Burden Hrs / Response (d)	Total Annual Burden Hrs (e) = (c) x (d)	Hourly Wage Rate (for Type of Respondent) (f)	Total Annual Wage Burden Costs (g) = (e) x (f)
Environmental Literacy Indicator Tool	Education Administrator	685	0.33	229	1 hour	229	\$43.74	\$10,016
Totals				229		229		\$10,016

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

There are no direct costs to respondents. The only costs are the costs of respondents' time required to provide information as explained in Question 12 above. No capital equipment, start-up, or record maintenance requirements are placed on respondents.

14. Provide estimates of annualized cost to the Federal government.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	CAPS ZA-4 Step 5	\$100/hr	40 hrs		\$ 4,000
Other Federal Positions					
Contractor Cost		\$100/hr	75 hrs		\$ 7,500
Travel					
Other Costs:					
TOTAL					\$ 11,500

15. Explain the reasons for any program changes or adjustments.

In an effort to increase response rates by lessening the time burden from 90 minutes to 60 minutes, a number of questions were removed from the instrument. The changes are detailed

below:

- The Student Participation in Meaningful Watershed Educational Experiences section (Section II) was paired down from ten multiple choice questions and nine short answer questions to four multiple choice questions and six short answer questions.
- The Sustainable Schools section (formerly Section III) was completely removed.
- The Continuous Environmental Education Improvement Efforts section (formerly Section IV, now Section III) was paired down from five short answer questions (in addition to an optional question) and one multiple choice, to two short answer questions and one multiple choice.
- Slight changes in phrases or words to clarify questions have been made (ex. Section I, Question A the addition of “This need not be a full time position” was added for clarity).

Information Collection	Respondents		Responses		Burden Hours		Reason for change or adjustment
	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	
Environmental Literacy Indicator Tool	685	352	229	352	229	528	Lessened burden time in an effort to increase response rates
Total for Collection	685	352	229	352	229	528	
Difference	333		-123		-299		

Information Collection	Labor Costs		Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	Current	Previous	
Environmental Literacy Indicator Tool	\$7,733	\$0	\$0	\$0	Updated estimates
Total for Collection	\$7,733	\$0	\$0	\$0	
Difference	\$7,733		\$0		

16. For collections whose results will be published, outline the plans for tabulation and publication.

The data will be summarized using descriptive statistics, such as frequency of response or mean response for each item. For the items regarding environmental literacy planning activities, responses to each item will be given a score based on level of readiness, and a total score across all questions will be calculated and used for reporting an overall readiness score. The results will be presented as an aggregated watershed-wide summary and by state.

These data will be published on the Chesapeake Progress website (as described in question 2 above), including displays of change in aggregated results over time.

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

The OMB approval expiration date will be displayed at the beginning of the ELIT.

18. Explain each exception to the certification statement.

There are no exceptions for compliance with provisions in the certification statement.