

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

- 1. Explain the circumstances that make the collection of information necessary. What is the purpose for this information collection? Identify any legal or administrative requirements that necessitate the collection. Include a citation that authorizes the collection of information. 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, list the sections with a brief description of the information collection requirement, and/or changes to sections, if applicable.**

The Office of Charter School Programs (CSP) in the U.S. Department of Education (ED) needs reliable data to understand the current facilities landscape for charter schools. Through the National Charter School Resource Center (NCSRC), CSP administers a national survey on charter school facilities to document the conditions and operations of buildings used by charter schools. Data collection from this survey will inform actions ED and state agencies may take to support facility needs in charter schools.

The survey questionnaire is a revision based on an instrument used in a previous state-level data collection, OMB Control Number: 1855-0024. The original survey questionnaire has 12 sections covering a wide range of topics, including general facility information, facility amenities, land use, funding and expenditures, access to funding, and facility size and constraints. The questionnaire took up to 1.5 hours to complete and was delivered electronically.

For the national survey data collection under this information clearance request, we revised the original state survey questionnaire to (1) update information collected in the past at a national level, (2) provide new data informing public understanding of charter school facilities, and (3) reduce the burden on individual respondents. Compared to the state survey, the national questionnaire will focus on the condition of facilities, facility acquisition, and funding sources for charter schools to acquire and maintain facilities. A pilot test of the questionnaire revealed that it would take respondents approximately 34 minutes to complete. Once data collection is completed, NCSRC will produce a report and an analysis summarizing the national findings.

- 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.**

CSP contracts with NCSRC to provide resources and information to the public in pursuit of CSP's statutory mission. Data collected from this survey are intended to inform researchers, education practitioners, and policymakers of the status and the operation of charter school facilities. Data from the previous data collection informed multiple state-level reports on charter school facilities. The past survey results provided evidence for facility problems charter schools face and have resulted in legislative and other changes in their states towards facility equity. For example, after the state survey results were published, New Jersey announced \$125 million dollars in Qualified School Construction Bonds to support construction, expansion, or enhancement of charter schools. The charter support organization (CSO) in South Carolina reports that the Charter Facility Tax Bill

passed during the 2013-2014 legislative session was a direct result of the state facility survey. The CSO in Idaho reported, “The facilities report helped charter schools in Idaho, for the very first time, get some facility dollars from the state, about \$120 per student in 2013-14 and \$180 in 2014-15”. The Massachusetts Development Finance Agency was awarded \$2,671,388 by ED to help charter schools guarantee a portion of a loan or bond to improve its school facility. In Texas, the data has been used to support school finance litigation.

The data collection will take place during months most practical for school schedules. The survey will be administered to the appropriate staff and collected through web-based technology. NCSRC will coordinate the selection of participating states; provide financial, logistical, and training support for CSO personnel involved in collecting the data; and conduct the data analysis resulting in a national report. NCSRC will aggregate and analyze data to report findings at the project’s conclusion.

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. Please identify systems or websites used to electronically collect this information. Also describe any consideration given to using technology to reduce burden. If there is an increase or decrease in burden related to using technology (e.g. using an electronic form, system or website from paper), please explain in number 12.**

The collection of survey data will take place through the electronic survey platform, SurveyMonkey, accompanied by follow-up phone calls and emails. Respondents will access the consent form and the survey questionnaire via an URL embedded in an email that will take them to webpages where the survey questionnaire resides. The use of electronic data collection is consistent with the earlier data collection. It minimizes the risk of misplacement of the questionnaire, decreases the cost of data collection, and reduces the burden on the respondents to return the questionnaire. The electronic data collection also allows the data collector to track respondents’ progress and provide effective and timely technical assistance if needed.

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

This survey study is the first national effort to collect information about charter school facilities. In 2003, the National Center for Education Statistics (NCES) published the Condition of Public School Facilities, 1999 (FRSS 73): Public Use Data Files. The data collection did not include charter schools. In 2014, NCES released the Public-Use Data Files and Documentation (FRSS 105): Condition of Public School Facilities: 2012-13. The data collection included charter schools in its sample but did not allow for the analyses of data from charter schools. There are also surveys on charter school facilities in different states, but the state-level profiling is not designed to develop a national

understanding of charter school facility status. Recently, the U.S. Government Accountability Office conducted a study on school facilities in 2020 and issued a congressional report based on survey data collected from 50 states, the District of Columbia, and 52 charter school districts. The school-level data in this report is limited to site visits to five schools in four states¹. To our knowledge, this is the only comprehensive survey to properly assess the current and future efforts of charter schools to improve or maintain their facilities.

- 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.**

The surveys will be administered directly to charter schools that are public schools. To administer these surveys, NCSRC may use the assistance of individuals working at statewide or regional CSOs or other charter organizations, some of which are small businesses or not-for-profit enterprises. According to the National Alliance for Public Charter Schools, there are 93 CSOs in 43 states². To reduce the burden on the state and regional organizations, NSCRC will provide financial, logistical, and training support to CSO personnel involved in collecting the data.

- 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.**

This survey will inform CSP and the public of the conditions of charter schools' facilities and inform policies to enable charter schools to better serve their students. The survey data is particularly useful to two ED-funded grant programs related to charter school facilities, the Credit Enhancement Program and the State Incentives Program. Without the nationally representative data, ED will be limited in its ability to address legislative and financial issues charter schools face and make evidence-based policy decisions to adequately address the needs of millions of students and families served by charter schools.

- 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;**

¹ <https://www.gao.gov/assets/710/707374.pdf>

² <https://www.publiccharters.org/our-work/what-we-stand-for/partners>

- **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 that 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 require the information collection to be conducted in any of the manners described above.

8. **As applicable, state that the Department has published the 60 and 30 Federal Register notices as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.**

Include a citation for the 60 day comment period (e.g. Vol. 84 FR ##### and the date of publication). Summarize public comments received in response to the 60 day notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. If only non-substantive comments are provided, please provide a statement to that effect and that it did not relate or warrant any changes to this information collection request. In your comments, please also indicate the number of public comments received.

For the 30 day notice, indicate that a notice will be published. 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.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

To develop the best possible set of data and information about charter school facilities and their need, NCSRC used the original charter school facilities survey as a base and piloted a streamlined version based on feedback from the Facilities Expert Panel with five charter schools. Cognitive interviews were held with these schools to identify the understanding of each question.

NCSRC has held conversations with a Charter Facilities Expert Panel that included individuals from the National Alliance for Charter Schools' Charter Facility Center, Momentum Strategies (previous experience implementing the facilities survey), and Charter School Growth Fund. NCSRC has held conference calls with the Facilities Expert Panel members to discuss the state surveys and understand the impact of the finalized survey. In addition, these groups informed NCSRC about the process for conducting these surveys and how they were able to ensure the appropriate questions were being asked.

On November 9, 2020, a Federal Register Notice requesting public comment was published (Vol. 85, No. 217, page 71334). We received one off-topic comment 60-day comment period and will not be providing a response. The Department is publishing the applicable 30-day Federal Register notice to request public comment.

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

Upon expressing consent to the study, respondents will be eligible to receive a \$50 VISA gift card to cover the time they spend on the survey. We assume that the primary contact for the survey is a school administrator familiar with school facility issues. This school staff member will spend time communicating and coordinating with us throughout the survey data collection and completing the questionnaire.

The national estimate of the mean salary for school administrators is \$100,340 in 2019.³ Assuming a full-time equivalent of 2080 hours per year, we calculated the hourly rate is \$48.24. We projected that it would take 34 minutes to complete the questionnaire (see item 12 for more details), which is about \$27.34 per response. We also assumed that it would take 30 minutes for the school administrator to communicate with data collectors about the survey from the initial contact to the conclusion of the study, which is about

³ <https://www.bls.gov/oes/current/oes119032.htm>

\$24.12 per response. The \$50 incentive is comparable to the payment respondents receive at work for the same amount of time, which is estimated at \$51.46, i.e., the sum of \$27.34 and \$24.12.

- 10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.⁴ If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data. If no PII will be collected, state that no assurance of confidentiality is provided to respondents. If the Paperwork Burden Statement is not included physically on a form, you may include it here. Please ensure that your response per respondent matches the estimate provided in number 12.**

No PII will be collected. No assurances of confidentiality are provided to respondents. Responses to this data collection will be used only for statistical purposes and findings will be in aggregate so no individual schools will be identified.

- 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.**

No questions in this information collection are of a sensitive nature.

- 12. Provide estimates of the hour burden for this current information collection request. The statement should:**
- **Provide an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. Address changes in burden due to the use of technology (if applicable). Generally, estimates should not include burden hours for customary and usual business practices.**

⁴ Requests for this information are in accordance with the following ED and OMB policies: Privacy Act of 1974, OMB Circular A-108 – Privacy Act Implementation – Guidelines and Responsibilities, OMB Circular A-130 Appendix I – Federal Agency Responsibilities for Maintaining Records About Individuals, OMB M-03-22 – OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, OMB M-06-15 – Safeguarding Personally Identifiable Information, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information)

- **Please do not include increases in burden and respondents numerically in this table. Explain these changes in number 15.**
- **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. 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 this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burden in the table below.**
- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. [Use this site](#) to research the appropriate wage rate. 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. If there is no cost to respondents, indicate by entering 0 in the chart below and/or provide a statement.**
- **Provide a descriptive narrative here in addition to completing the table below with burden hour estimates.**

This national survey will collect data from one type of respondent – charter school leaders. Charter schools are public schools that can be non-profit or for-profit. The sample of charter schools is 875 schools assuming a response rate of 80% to result in a target of 700 respondents, i.e., 700 responses.

We estimate that it would take approximately 34 minutes for respondents to complete the survey. The burden was estimated using Survey Monkey tracking and exit interviews during a pilot test of the survey instrument with five schools. Survey Monkey reported that the typical time spent on the survey was 31 minutes. This number estimates the amount of time participants took in opening the survey, retrieving information, and reporting information in the survey. In exit interviews, participants self-reported completing the survey (including information retrieval and data reporting) in an average of 36 minutes. The average of these two numbers is around 34 minutes, which is what is used to estimate the burden.

With the average burden hours per response estimated at 34 minutes, the total annual burden hours were estimated at 397 hours by multiplying the average burden hours per response by the estimated number of responses. The estimated respondent average hourly wage was estimated by calculating the hourly wage for occupation number 11-9032 Education Administrators, Kindergarten through Secondary based on the mean annual wage for May 2019.⁵ The estimated total annual burden hours and estimated respondent hourly wage were multiplied to estimate the total annual costs, which were calculated at \$19,139 across participants.

⁵<https://www.bls.gov/oes/current/oes119032.htm>

Estimated Annual Burden and Respondent Costs Table

<i>Information Activity or IC (with type of respondent)</i>	<i>Sample Size (if applicable)</i>	<i>Respondent Response Rate (if applicable)</i>	<i>Number of Respondents</i>	<i>Number of Responses</i>	<i>Average Burden Hours per Response</i>	<i>Total Annual Burden Hours</i>	<i>Estimated Respondent Average Hourly Wage</i>	<i>Total Annual Costs (hourly wage x total burden hours)</i>
Survey Data Collection (Charter School Leader)	875	80%	700	700	0.57	397	\$48.25	\$19,139

Please ensure the annual total burden, respondents and response match those entered in IC Data Parts 1 and 2, and the response per respondent matches the Paperwork Burden Statement that must be included on all forms.

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.)**
 - **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.**
 - **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12.

Total Annualized Capital/Startup Cost : \$0
Total Annual Costs (O&M) : \$0 _____
Total Annualized Costs Requested : \$0

There will be no capital, startup or maintenance costs to respondents.

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 estimated cost of the study to the federal government incurred through the contract to Manhattan Strategy Group is \$1,021,562 over a period of 5 years (July 2019 through September 2023). This represents the contractor's costs for labor, other direct costs, and indirect costs. The annualized cost to the federal government is \$204, 312.4.

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).

Provide a descriptive narrative for the reasons of any change in addition to completing the table with the burden hour change(s) here.

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Total Burden		97	
Total Responses		500	

Total Costs (if applicable)			
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This is a revision of an existing information collection request. The annual estimated burden was 300 hours for the original data collection, with a target sample of 200 respondents and an estimated burden of 1.5 hours per respondent.

The annual estimated burden is 397 hours for the current request, including a target sample of 700 respondents and an estimated burden of 34 minutes per respondent. The burden per respondent decreases from 1.5 hours to 34 minutes, a reduction of 56 minutes per response, as the number of questions in the survey decreases from 262 to 43 questions. However, as the expected survey sample increases from 200 to 700 respondents, the total response burden increases by 97 hours, from 300 to 397.

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.

We will publish a study report tabulating estimated means and standard deviations of measures of interests based on survey responses provided by sampled schools. In the study report, we will also report school facility conditions and operations by subgroups to examine variations among schools. These estimates will depend on sampling variability indicated by standard errors, a measure of the precision expected from a particular sample.

We expect to make nonresponse adjustments within strata defined by urbanicity (city versus others), school instructional level (schools serving elementary grades, i.e., any grade between prekindergarten and fifth grade, versus schools serving secondary grades only), and percentage of students from low-income families (eligible for Title-I programs versus others).

Due to the complex sampling design, the variances of the estimates from the National Charter School Facility Survey (e.g., estimates of proportions) may differ from what would be expected from data collected with a simple random sample. Not taking the complex sample design into account can lead to an under- or over-estimation of the standard errors associated with such estimates. Therefore, we will use a computer program WesVar to implement techniques such as jackknife replication (JK1) to compute estimates of standard errors.

The data collection needs to start no later than May 2021 and complete no later than December 2021. The results of the data collection will be reported and published by September 2023.

- 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.**

We will display the expiration date for OMB approval.

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

There is no exception to the certifications.