

Survey on Use of Funds Under Title II, Part A

Supporting Statement for Paperwork Reduction Act
Submission

PART A: Justification

February 2021

Contract # ED-PEP-16-A-0006/91990018C0001

Submitted to:
Office of the Chief Data Officer
U.S. Department of Education

Submitted by:
Westat
An Employee-Owned Research Corporation[®]
1600 Research Boulevard
Rockville, Maryland 20850-3129
(301) 251-1500

Part A. Justification

The U.S. Department of Education (the Department) requests clearance to collect data from states annually about how Title II, Part A funds are used to support authorized activities and improve equitable access to teachers for low-income and minority students; and where applicable, evaluation and retention data for teachers, principals, and other school leaders. The reporting requirements are outlined in Section 2104(a) of the Elementary and Secondary Education Act (ESEA), as reauthorized by the Every Student Succeeds Act of 2015 (ESSA).

A.1. Circumstances Making Collection of Data Necessary

ESSA places a major emphasis on teacher quality as a significant factor in improving student achievement. Under the ESEA, Title II, Part A (Supporting Effective Instruction) provides funds to State educational agencies (SEAs) to support effective instruction through the preparation, training, and recruitment of high-quality teachers, principals, and other school leaders. States are provided Title II, Part A State activities funds for this purpose, allowable uses of which include:

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

The survey asks SEAs how they used their Title II, Part A State activities funds. The survey asks about SEA usage of State activities funds to support college- and career-ready standards, educator evaluation systems, and the equitable distribution of effective teachers. While building on previous data collections, the survey accounts for allowable activities in the statute and requests data on teacher evaluation and retention to help SEAs meet reporting requirements under Section 2104(a).

Results from prior surveys can be found at <https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/instruction-state-grants-title-ii-part-a/resources/>.

A.2. Purposes and Uses of the Data

The Department will collect the information annually from 52 SEAs, which consists of the 50 States, the District of Columbia, and Puerto Rico. The information obtained from the surveys will provide the Department with a description of how Title II, Part A State activities funds are used by each State. In addition, the survey will provide data on teacher, principal, and other school leader evaluation and retention. To the extent possible, the results from the current survey will be compared with those of previous collections. The Department will post the survey results on the program web page. A copy of the proposed data collection instrument is provided in Appendix A.

A.3. Use of Technology to Reduce Burden

Respondents will receive a notification letter by email and follow-up reminders, as needed. Respondents will be asked to complete the survey using an online data collection system. The SEA survey URL will include embedded login information to reduce the burden of sharing access to the survey within the state if more than one person needs to provide information. Embedding login information eliminates data entry error when accessing the survey.

Web-based surveys reduce errors with built-in edits and decrease the cost for postage, coding, keying and cleaning of the data. This survey mode also allows respondents to complete the survey at a location and time of their choice.

A.4. Efforts to Identify and Avoid Duplication

The information requested in the Survey on the Use of Funds Under Title II, Part A is only being collected by the existing survey and is not available in other forms. This data collection effort is part of a planned, ongoing data collection to describe the nature of the Title II, Part A program as it is implemented at the LEA and SEA levels.

A.5. Efforts to Minimize Burden on Small Business or Other Entities

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

A.6. Consequences of Not Collecting Data

It is critical that this data collection be conducted on an annual basis to monitor program implementation, particularly with the revisions to the program and allowable uses of the funds following the reauthorization of ESEA by ESSA. The main consequence of not collecting this Title II, Part A data on an annual basis is that the Department will not have up-to-date information on how SEAs are using their Title II, Part A funds and will not meet the reporting requirements under Section 2104(a). There are no technical or legal obstacles to reducing burden.

A.7. Special Circumstances

There are no special circumstances involved with this data collection. The data collection will be conducted consistently with the guidelines in 5 CFR 1320.5.

A.8. Federal Register Announcement and Consultation Outside the Agency

The study team convened a group of 6 staff from 5 SEAs of varying sizes and locations to conduct an expert review and provide feedback on the new survey questions through a facilitated focus group discussion. The team used the feedback from the expert reviewers to revise the survey questions and burden statement. The Department published the 60-day *Federal Register* notice on December 10, 2020 (85 FR 79481). Two public comments were received. A response to those comments is provided. A 30-day *Federal Register* notice will be published.

A.9. Payments to Respondents

There will be no payments to respondents.

A.10. Assurance of Confidentiality

There is no assurance of confidentiality.

A.11. Questions of Sensitive Nature

There are no questions of a sensitive nature.

A.12. Estimates of Respondent Burden

Annually, 52 SEAs (50 states, the District of Columbia, and Puerto Rico) will submit data via an online survey. The study team estimates that the SEA survey will take an average of 8 hours to complete including any time responding to questions and correcting any errors. The total burden for the FY2021 data collection is 416 hours (see Table A-1 below). The annualized burden over three years is presented in Table A-2.

Table A-1. Estimates of respondent burden

Informant/ data collection activity	Number of respondents	Minutes per complete	Number of administrations	Burden in minutes	Total burden hours	Total costs
SEA survey	52	480	1	24,960	416	\$20,067.84

NOTE: Assumes an hourly rate of \$48.24 per hour for educational administrators (derived from the Bureau of Labor Statistics' Occupational Employment and Wages for educational administrators, May 2019). See: <https://www.bls.gov/oes/current/oes119032.htm>.

Table A-2. Estimates of annual respondent burden over a three-year period

Informant/data collection activity	Number of respondents	Total burden hours	Total costs
SEA survey	156	1,248	\$60,203.52

NOTE: Assumes an hourly rate of \$48.24 per hour for educational administrators (derived from the Bureau of Labor Statistics' Occupational Employment and Wages for educational administrators, May 2019). See: <https://www.bls.gov/oes/current/oes119032.htm>

A.13. Estimates of the Cost Burden to Respondents

There are no annualized capital/startup or ongoing operation and maintenance costs associated with collecting the information that is in addition to costs identified in A.12 and A.14.

A.14. Estimates of Annualized Government Costs

The cost to the government for Westat to develop the survey instruments and collect the data are \$140,803 for school year 2020-21 and the costs for Westat to analyze the data and prepare the report are \$105,628. Thus, the total contractor costs for school year 2020-21 are \$246,431. The total costs for subsequent years are \$161,556 (2021-22) and \$165,341 (2022–23). These estimates are based on previous experience with similar data collections.

A.15. Changes in Hour Burden

The study team estimates that it will take 8 hours to complete the survey. As a result, the total annual hours is 416 hours.

A.16. Plans for Tabulation and Publication of Results

The results from the survey may be published in an issue brief similar to the 2015–16 results currently available on the Department's website (<https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/instruction-state-grants-title-ii-part-a/resources/>). No complex analytical techniques will be used. In addition, the data obtained through this data collection will be incorporated into congressional briefings, as well as the Department's GPRA indicators and presentations to state Title II, Part A coordinators.

The study team anticipates using the same schedule as for previous cycles of this information collection. SEAs will be asked to complete the survey in June of 2021 regarding the 2020–21 school year.

A.17. Display of Expiration Date for OMB Approval

The Department is not requesting a waiver for the display of the OMB approval number and expiration date. The survey and notification letters will display the expiration data for OMB approval.

A.18. Exceptions to Certification Statement

This submission does not require an exception to the Certificate for *Paperwork Reduction Act* (5 CFR 1320.9).