Tracking and OMB Number: 1840-0744
Revised: 12/2/2020

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.**

   This is a revision to to an existing data collection to incorporate COVID-19 guidance, and this statement supports the reporting required under Title II of the Higher Education Act of 1965, as amended (HEA), of the State Report Card (SRC) and Institution and Program Report Cards (IPRC). The attached forms reflect the electronic submission format respondents use to enter required information supporting the Title II data collection. Title II of the HEA mandates the Title II Teacher Quality Accountability data collection and a report by the Department to the U.S. Congress to provide more meaningful data on teacher preparation program quality.
   See http://title2.ed.gov/Public/TA/HEA_2008_Sections%20205_208.pdf.

   Although the statutory reporting requirements for States and institutions of higher education (IHEs) in section 205(a) and (b) are extensive, a chief purpose of this reporting is to improve the overall quality of teacher preparation programs and the programs' ability to produce teachers who are well-prepared to teach when they enter the classroom. This submission is for a slight revision of the instructions to reiterate to institutions where additional information can be entered.

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

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

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.**

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

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

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

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

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

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

Title II of the HEA mandates this annual data collection. The Secretary as well as the States, institutions and programs required to report would be out of compliance with the statute if the information were not collected annually and reported in a timely manner.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**

   - **requiring respondents to report information to the agency more often than quarterly;**
   - **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
   - **requiring respondents to submit more than an original and two copies of any document;**
   - **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
   - **in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;**
   - **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
   - **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or 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 would require this information collection to be conducted in any of the ways listed as part of this question.

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.

   There are no changes in the IPRC or the SRC.

   A 60-day Federal Register notice was published December 9, 2020 (Vol. 85, No. 237, page 79170) requesting public comment on this information collection. One comment was received during the 60-day public comment period. The comment did not address the document so no changes will be made. Based on the lack of comments received the Department will request the 30-day public comment period.

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

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

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.[1] 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.

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

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

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

12. Provide estimates of the hour burden 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.**
- **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**

[1] 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, and OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information).

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.

The statute requires that IHEs and States establish an information and accountability system through which the nation's 1,541 IHEs providing teacher education programs and all States report on the performance of their teacher preparation programs. Nearly all (99 percent) of the IHEs providing teacher preparation programs are four-year institutions. Sixty percent of these IHEs are private-not-for-profit, 38 percent are public institutions, and 2 percent are private for-profit as reported in *The Secretary's 10th Report to Congress on Teacher Quality* (https://title2.ed.gov/Public/TitleIIReport16.pdf). States also report data on alternative routes to certification programs, including programs based at an IHE and those not based at IHEs. The total number of entities offering teacher preparation programs in 2018 was 1,735.

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

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

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

There is an estimated burden of 242 hours per State to report on the SRC. The respondents for SRC are 59 U.S. States and jurisdictions, reporting annually. The total burden for the SRC is 14,278 hours. The SRC will continue to collect data in the aggregate at the institution or entity level on number of participants served in traditional and alternative route teacher preparation programs and by program for non IHE-based alternative routes at the program level.

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

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

The IPRC burden hours are based on 1,735 teacher preparation programs, resulting in a total burden 253,310 (146 X 1,735) hours.

Estimated Annual Burden and Respondent Costs Table

Information Activity or IC (with type of respondent)	Sample Size (if applicable)	Respondent Response Rate (if applicable)	Number of Respondents	Number of Responses	Average Burden Hours per Response	Total Annual Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
IPRC			1,735	1,735	146	253,310	$31	$7,852,610
SRC			59	59	242	14,278	$31	$442,618
Annualized Totals			1,794	1,794		267,588		$8,295,228

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 :
Total Annual Costs (O&M) :____________________
Total Annualized Costs Requested :

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

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

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

15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic

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

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			
Total Responses			
Total Costs (if applicable)			

OMB clearance was granted on 09/10/2019. The additional document being submitted was not included in the clearance package. It consists of further instructions for the Institution and Program Report Card (IPRC), which was previously approved. The additional document will not result in a significant change in burden. It is for informational purposes only to reiterate to respondents where they can add further information to explain their answers to the questions. The purpose is to alleviate respondents' concerns regarding the appearance of their data due to changes in programs based on COVID restrictions. No other instructional manuals are provided.

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

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

and on the Department's HEA Title II program web site at
https://title2.ed.gov/Public/Home.aspx.

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

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

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

There are no exceptions to the statement.