

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 request is for an **extension** with adjustment due to a change in the number of grantees of OMB approval to collect data necessary to support the following: Charter School Programs Data Collection, Risk Assessment, and Monitoring. This contract encompasses support services to perform data collection, data analysis, risk assessment, grantee monitoring, as well as the operations, sustainment, documentation, training, and enhancement of the pending Charter School Programs Online System (CSPOS), which is currently pending authorization at ED

The Charter Schools Program (CSP) was originally authorized under Title V, Part B, Subpart 1, Sections 5201 through 5211 of the Elementary and Secondary Education Act (ESEA) of 1965, as amended by the No Child Left Behind (NCLB) Act of 2001. For fiscal year 2017 and thereafter, ESEA has been amended by the Every Student Succeeds Act (ESSA), (20USC 7221-7221i), which reserves funds to improve education by supporting innovation in public education and to: (2) provide financial assistance for the planning, program design, and initial implementation of charter schools; (3) increase the number of high-quality charter schools available to students across the United States; (4) evaluate the impact of charter schools on student achievement, families, and communities, and share best practices between charter schools and other public schools; (5) encourage States to provide support to charter schools for facilities financing in an amount more nearly commensurate to the amount States typically provide for traditional public schools; (6) expand opportunities for children with disabilities, English learners, and other traditionally underserved students to attend charter schools and meet the challenging State academic standards; (7) support efforts to strengthen the charter school authorizing process to improve performance management, including transparency, oversight and monitoring (including financial audits), and evaluation of such schools; and (8) support quality, accountability, and transparency in the operational performance of all authorized public chartering agencies, including State educational agencies, local educational agencies, and other authorizing entities.

This data collection is coordinated with the *EDFacts* Initiative (*EDFacts*) to reduce respondent burden and fully utilize data submitted by States and available to the U.S. Department of Education (ED) through the *EDFacts* database. Specifically, under the current data collection, ED collects CSP grant award information from grantees (State agencies, charter management organizations, and some schools) to create a new database of current CSP-funded charter schools and award amounts. Once complete, ED merges performance

information extracted from the *EDFacts* database with the database of CSP-funded charter schools. Together, these data allow ED to monitor CSP grant performance and analyze data related to accountability for academic performance, financial integrity, and program effectiveness.

Identifying Data Needs

The first task in reaching the project's goals was to develop a reporting system to gather consistent and complete data on CSP grantees and on charter schools nationally. The data required by ED are:

- Detailed financial information on implementation of CSP grant activities
- Data responding to ED and CSP performance and efficiency measures
- National charter school information from other data sources, such as the Common Core of Data and *EDFacts*

ED specified several aspects of program effectiveness and efficiency that the data collection should address. They included the program information needs outlined in the January 2005 Government Accountability Office (GAO) report, program information for determining achievement of the CSP Government Performance and Results Act (GPRA) indicators, and other information to respond to the Office of Management and Budgeting (OMB) Program Assessment Rating Tool (PART).

GAO Reports

In January 2005, GAO issued a report entitled *To Enhance Education's Monitoring and Research, More Charter School-Level Data Are Needed* which examined (1) how States allow for charter school flexibility, (2) how States promote accountability for school performance and financial integrity of charter schools, (3) the implications of NCLB for charter schools, and (4) the role ED plays in charter school accountability. In the report, GAO recommended that ED help States, which are CSP grant recipients, track Federal funds to charter schools and report the number of charter schools started with CSP funds. In addition, GAO recommended that the CSP link its own data collection with the newly developed *EDFacts* data collection (formerly Performance Based Data Management Initiative, PBDMI). The current data collection has begun the process of accomplishing these recommendations.

OMB Review of GPRA Indicators

Congress enacted the Government Performance and Results Act (GPRA) in 1993 in an effort to reduce waste and inefficiency in Federal programs and promote accountability. GPRA called on each Federal agency to produce annual performance plans and reports beginning in 1999 that were to include quantifiable and measurable performance goals and performance indicators for the programs in each agency. For CSP, the original GPRA goal was to encourage the development of a large number of high-quality charter schools. As a result, two indicators have been used to measure the success of this goal: (1) the number of charter

schools in operation around the nation and (2) the number of States with charter school legislation.

OMB, which has responsibility for approving GPRA indicators, also reviews the value of the indicators and the processes used to gather the data. ED and OMB jointly reviewed the CSP using Performance Assessment Rating Tool (PART). Following the review, the CSP office proposed three new GPRA performance indicators:

- The percentage of charter school students in grades 4 and 8 at or above proficiency in reading
- The percentage of charter school students in grades 4 and 8 at or above proficiency in mathematics
- The Federal cost per pupil in a successful charter school (with “successful” defined as a school open for three or more years)

Additional Reports

Charter school researchers have also pointed to the need for more complete data on charter schools, primarily in the interest of policy research. For example, Lake and Hill (2005) identified areas of State and local record keeping that need improvement. Writing for the National Charter School Research Project (NCSRP), they found that data on student characteristic data such as race/ethnicity, free/reduced-price lunch, special education, and English language learners (ELL) were hard to get from State charter school offices. NCSRP also had difficulty obtaining data on how charter schools were performing within Federal and State accountability systems, including the percentage of charter schools making adequate yearly progress (AYP) and the percentage of charters labeled as low-performing. Other charter school-related data NCSRP had difficulty finding from existing sources were charter school per-pupil funding, waiting lists, parent satisfaction, and class size.

Data to be Collected

Based on the information needs of ED and the recommendations of the GAO and OMB, ED created a new database of current CSP-funded charter schools and their award amounts. Funding for charter schools is provided in three ways: directly to the charter schools, through a State agency who awards grants to charter schools, and through a Charter Management Organization (CMO) that replicates and expands high-quality charter schools. Under the current data collection, ED collects data from State agencies, CMOs, and charter schools.

As of January 2021, 47 States and territories (including the District of Columbia, Puerto Rico and Guam) have charter school legislation. Thirty-four of these States have active CSP grants. The CSP also provides direct grants to 49 charter schools that did not receive or apply for a CSP grant and 75 CMOs to replicate and expand high-quality charter schools. The process for collecting data from the State agencies, CMOs, and charter schools is outlined below.

Collect CSP Subgrant Award Information from State Agencies: Each State agency that received a Federal CSP grant will be asked to provide the information in Exhibit 1 for the subgrants it awarded from Federal fiscal year funds. The collection form will be customized for each State agency to include the year, award number, and award amount of the CSP grants. Providing information on the CSP grants to the State agencies should assist them in gathering the information for this collection. Also at this time (first contact), information describing all phases of data collection, total burden, and the use of additional data sources (EDFacts) to reduce burden will be provided to the State agencies.

Collect CSP Sub-recipient Award Information from Charter Management Organizations: Charter Management Organizations that received a Federal CSP grant will be asked to provide the information described in Exhibit 1 for the schools it supported from Federal fiscal year funds. Similar to the collection form used with State agencies, the CMO collection form will include the year, award number, and award amount of the CSP grants. Additional information extracted from EDFacts will reduce the burden for CMOs.

Collect CSP Grant Award Information from Charter Schools Funded by Direct Grants: The CSP grant award information for the grantees that are not States or CMOs but received direct grants from ED will be extracted from the G5 grants management database. However, NCES IDs, which are required for linking of other information, are not always available in G5 and will need to be collected from the recipients. ED will require the recipients to verify all of the same information described in Exhibit 1, and to fill in any missing information.

Exhibit 1: Data Elements Included in the Database of Current CSP-Funded Charter Schools and Award Amounts

Information for Each Federal Fiscal Year CSP Subgrant	Detail
Subgrantee identification (the entity that received the funds)	<ul style="list-style-type: none"> • Subgrantee name • Subgrantee School NCES ID • Subgrantee mailing address
LEA of the subgrantee (will allow matching of subgrant award information to information from other sources)	<ul style="list-style-type: none"> • LEA name • LEA NCES ID • LEA mailing address • Whether it is an LEA with only charter schools (yes or no) • Whether the charter school acts as its own LEA (yes or no) Note: Not all charter schools are approved by a separate LEA
Charter School Management Organization (CMO)	<ul style="list-style-type: none"> • CMO type • CMO name • CMO mailing address
Charter School Authorizer	<ul style="list-style-type: none"> • Authorizer type • Authorizer name • Authorizer mailing address

Information for Each Federal Fiscal Year CSP Subgrant	Detail
Subgrant Award Information Note: States and CMOs will be provided with their award number, the total dollar amount of the award, and the grant period.	For each charter school: <ul style="list-style-type: none"> • Project period begin and end date • Dollar amount of subgrant award from each Budget Period • Month and year of each subgrant award • Type of subgrant (Preplanning, Planning and Program Design, Implementation, Expansion, Replication or Dissemination)
Charter school operation	For each charter school: <ul style="list-style-type: none"> • School year school first enrolled students (school year, or “not applicable” for future schools or closed schools) • Student enrollment data for past three years • Operational status (Open, Future, Will not open, Closed)
Additional Information	For each Charter Management Organization sub-recipient: <ul style="list-style-type: none"> • Grades served for each Federal fiscal year and the year prior to expenditure of CSP funds • Planned grades during the project period • Planned enrollment during the project period • Grade levels served by prior CSP grant (if applicable) • Funding amount of prior CSP grant (if applicable)

To assist the State agencies and CMOs, these data are currently collected using a preformatted spreadsheet. For example, the form for each SEA includes the award number, the dollar amount of the award, and the grant period. The product of this data collection is a database of subgrant award information from State agencies, CMOs, and direct grant recipients. As necessary, ED contacts the grantees to verify collected information described above to ensure an accurate and complete dataset.

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.

Extension of OMB approval will allow ED to collect data from current grantees throughout their grant performance period. The data collection, combined with the student demographic and performance information extracted from the ED*Facts* database, will allow ED to monitor CSP grant performance and analyze data related to accountability for academic performance and financial integrity. In addition, the CSP will use these data to plan for and provide technical assistance to support grantee monitoring and evaluation, and identify and support the dissemination of best practices.

As part of the General Education Provisions Act (GEPA) 424 data collection, ED collects information on the allocation of Federal grants by States who are recipients, including grants under CFDA 84.282. ED collected the GEPA data for fiscal years 2002, 2003 and 2004. CSP grants are forward funded. Therefore, the GEPA data available at that time related to school years 2002-2003, 2003-2004 and 2004-2005. ED first began collecting subgrant award data in fiscal year 2005 and the information collected at that time was used in place of the GEPA data collection.

The collection of grant information is needed for the CSP to monitor grantee performance and collect data related to the financial integrity and academic performance of subgrantees. Note that all the demographic and performance data needed for the CSP office is also needed for other purposes. For example, both the CSP and the Office of Special Education Programs need the number of Children with Disabilities (IDEA) in each charter school.

- 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.**

To assist State agencies, CMOs, and charter schools, the current and future data will be collected using a preformatted Excel spreadsheet, which will be emailed to respondents and completed electronically. All data readily available to ED are included in the spreadsheet. For example, the form for each SEA includes the award number, the dollar amount of the award, and the grant period. The State agency only provides the subgrant award information that is not accessible elsewhere.

As the respondents complete the forms, additional assistance is made available via email and telephone. A toll-free number and email address are available to CSP grantees to allow them to contact the project team with any questions or requests for assistance as they use the form to submit data. This information, along with the names of project contact persons, are clearly printed on the data collection forms and all correspondence.

- 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.**

Under ESSA, ED must ensure that new and expanding charter schools receive timely payment of Federal grant funds for which they are eligible. Although ED currently tracks payments to the fiscal agent (generally an SEA or LEA), it does not track payments to the school level. The current and future data collection will allow ED to track CSP grant funds to

the school level and gather CSP-related financial information currently unavailable anywhere else.

The data collection efforts under this project gathers CSP subgrant award information from State agencies, CSP sub-recipient information from CMOs, and CSP grant award information from charter schools funded by direct grants. That data alone, however, does not provide enough information to draw conclusions about program effectiveness and efficiency. To ensure that a complete dataset is available, ED combines the new CSP database with data extracted from *EDFacts*. This creates a complete dataset, maximizes the use of existing data sources, and reduces the data collection burden on State agencies, CMOs, and charter schools.

- 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 current and future data reporting collects data primarily from SEA officials in charge of CSP grants in each State and CMOs that are recipients of CSP grants. The exception to this occurs among the individual charter schools that receive a direct grant from the CSP (also known as Developer grantees). These schools are individually responsible for providing the requested data. Regardless of whether the reporting is done by SEA officials, CMOs, or individual schools, the impact on small entities is expected to be minimal.

- 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.**

The proposed data collection and subsequent merging of CSP data with existing data will provide ED with the data necessary to effectively monitor the performance and financial stewardship of CSP. The data collection process will be transparent, and the data to be collected will be consistent and easy to consolidate. Failure to collect the new CSP funding data – data not available in *EDFacts* – would seriously hinder ED’s ability to assess CSP’s financial integrity and the link between funding and student outcomes. Further, only by combining CSP financial data with performance data derived from *EDFacts* can ED measure CSP’s three GPRA indicators: (1) the percentage of CSP-funded charter school students in grades 4 and 8 at or above proficiency in mathematics; (2) the percentage of CSP-funded charter school students in grades 4 and 8 at or above proficiency in reading; and (3) the Federal cost per pupil in a successful CSP-funded charter school.

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.**

This data collection does not include any of the special circumstances as listed above. This information collection fully complies with 5 CFR 1320.5.

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.

ED published a 60-day Federal Register Notice on March 31, 2021 to solicit comments from the public. There were two comments received during the 60-day period. One was non-substantive. A response to the substantive comment is included as a supplementary document. A 30-day notice will be published.

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

There are no payments or gifts to respondents other than the allocation of Federal funds that result from the CSP grant award.

- 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.**

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

This collection does not involve collecting any confidential or personally identifiable information. Therefore, no assurances of confidentiality are required.

- 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.**

This project does not include any questions of a sensitive nature. As required by the Paperwork Reduction Act of 1995, information is provided to respondents about purposes of the data collection and how the information will be used by ED to monitor CSP grant performance and analyze data related to academic and financial accountability.

- 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 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 estimated annual response burden is 537 hours. Exhibit 2 aggregates the estimated total hours and costs to participants. The following section explains how burden estimates were calculated.

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)
SEA/SE CSP grantee	NA		47	2	2	188	\$55	\$10,340
CMO CSP grantee	NA		75	2	2	300	\$50	\$15,000
School/ Developer grantee	NA		49	2	.5	49	\$40	\$1,960
Annualized Totals			171	342	1.57	537	\$79.82	\$27,300

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.

The respondents in this data collection are the CSP grantees. Some grantees are SEA officials coordinating and managing the CSP subgrants in each State. Some are CMO representatives administering the CSP grant for schools managed by the organization. Other grantees are officials from CSP-funded charter schools (also known as Developer grantees).

There are currently 34 States and territories (including the District of Columbia, Puerto Rico and Guam) with charter school laws. For these States, the SEA CSP official will be responsible for submitting data to ED on all the subgrants awarded by the State (and 11 states will be reporting on multiple overlapping grants, bringing the number of state respondents to **47**). The **75** CSP Project Directors of CMOs awarded grants will submit data for the sub-recipient schools funded by these organizations. **Fourty-nine** schools currently receive grants directly from the CSP. Each of these schools will also submit data to ED, making the total number of respondents **171**.

We estimate that submitting the data for each CSP grant will take approximately 2 hours for the SE and CMO grantees, and less than that – around 30 minutes – for the school grantees. For SEA and CMO respondents, the total burden will vary depending upon the number of schools funded through their awards. During the first reporting period, award information is provided for each school funded through the grant. In subsequent years, grantees update the award information for these schools, and add new schools as needed. It is expected that the

burden will decrease in subsequent years as only updates are needed to the information previously reported on the data collection form.

The estimated total time for the reporting is 537 hours and 342 responses at an estimated total cost of \$27,300.

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 : _____

There are no additional respondent costs aside from those outlined in section A12.

- 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 total cost to the Federal Government for the data collection is \$464,964 annually. These costs are associated with (1) determining the data elements to be included in the reporting, (2) providing technical assistance to respondents on how to complete the data collection form, (3) merging the CSP grant award information with ED*Facts* data to create a complete dataset of financial, demographic, and achievement data for CSP schools, and (4) analyzing and reporting on the data from all CSP grantees for ED.

- 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.

The new burden estimates are primarily the result of changes to the number of respondents (there are currently more CSP grantees than in the past), improvements in calculating burden estimates due to continued experience and feedback from grantees, and a decrease in the number of schools funded by SE and CMO grantees (which is partly a result of changes in the charter schools landscape across the country).

The total burden from the previous request was 136 hours. The new burden is 537 annual hours at a total cost of \$27,300. There is an adjustment increase in the number of respondents from 102 to 171 and adjustment increase of 240 responses. The data collection form and the data collected however, remain the same as in the current collection and no changes to the collection have been made as a result of statute changes, or changes to program or agency discretion. While the number of respondents may change slightly from year to year as new grantees receive funding from the Charter Schools Program and current grantees complete their projects, the total burden remains virtually the same. Further, based upon the current

data collection, we have an accurate count of the number of sub grant awards to charter schools and can better estimate the reporting burden for each grantee based on this count. The data elements remain the same for the current and future data collection activities.

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Total Burden			401
Total Responses			240
Total Costs (if applicable)			\$27,000

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.

One of the data collection requirements is to analyze, report, and summarize the data obtained from SEA, non-SEA, and CMO grantees. The current analysis plan addresses various aspects of program effectiveness and efficiency such as the program information needs outlined in the January 2005 GAO report, program information required to determine achievement of CSP GPRA indicators, and other information to successfully respond to the OMB PART. From this analysis, ED and the CSP can effectively monitor CSP grant performance and analyze data related to accountability for academic performance and financial integrity.

Upon renewal of OMB approval we will continue to produce annual reports summarizing the data collection and analysis process. The reports will be written and organized with a national audience in mind, therefore making the content usable for a variety of readers, including charter school developers, operators, board members, teachers, parents, researchers, and authorizers. In 2010, we published the first round of State Charter School Profiles, which presented proficiency data for charter schools and traditional public schools in each state. These profiles will be updated and published annually using the data from this collection and the performance data available from the *EDFacts* database. Further, we will be prepared to brief program staff and/or policy makers about results as needed throughout the study's duration.

Finally, we will prepare a data file containing all data collected. This data file will include an explanation of contents, including variable and category labels, weights, a description of how missing data were addressed, and the unit of observation for each data file.

- 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.**

No request is being made for exemption from displaying the expiration date.

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

The results of this information collection will not be published for statistical purposes.

Citations

Government Accountability Office (January 2005). *Charter Schools: To enhance Education's monitoring and research, more charter school-level data are needed*. Washington, D.C.: Government Accountability Office.

Government Accountability Office (October 2005). *Education's Data Management Initiative: Significant progress made, but better planning needed to accomplish project goals*. Washington, D.C.: Government Accountability Office.

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