
**Supporting Statement for
OMB Clearance Request**

Part A

**National Implementation
Study of Student Support
and Academic Enrichment
Grants (Title IV, Part A)**

December 2021

Table of Contents

Part A: Justification	1
A.1. Circumstances Making the Collection of Information Necessary.....	1
A.2. Purposes and Use of the Information Collection.....	1
A.3. Use of Information Technology and Burden Reduction.....	2
A.4. Efforts to Identify Duplication.....	2
A.5. Efforts to Minimize Burden in Small Businesses.....	3
A.6. Consequences of Not Collecting the Information.....	3
A.7. Special Circumstances Justifying Inconsistencies with Guidelines in 5 CFR 1320.6.....	3
A.8. Consultation Outside the Agency.....	3
Federal Registry Requests.....	3
Consultations Outside the Agency.....	3
A.9. Payment or Gift to Respondents.....	4
A.10. Assurance of Confidentiality.....	4
A.11. Questions of a Sensitive Nature.....	5
A.12. Estimate of Response Burden.....	5
A.13. Estimate of Total Capital and Startup Costs/Operation and Maintenance Costs to Respondents or Record-Keepers.....	6
A.14. Estimate of Costs to the Federal Government.....	6
A.15. Changes in Burden.....	6
A.16. Plans for Analysis, Publication, and Schedule.....	6
A.17. Approval to Not Display Expiration Date.....	6
A.18. Exceptions to Item 19 of OMB Form 83-1.....	6

Table of Exhibits

Exhibit 1. Estimated Annual Response Burden in Hours.....	5
Exhibit 2. Estimated Annual Cost to Respondents.....	5

Part A: Justification

A.1. Circumstances Making the Collection of Information Necessary

The U.S. Department of Education (ED)'s Institute of Education Sciences (IES) requests clearance for data collection activities to inform the Student Support and Academic Enrichment grant program (Title IV, Part A of the Elementary and Secondary Education Act of 1965, amended by the Every Student Succeeds Act (ESSA)).

Title IV-A resulted from a consolidation of several programs as part of a congressional effort to allow more state and local decision-making about use of funds. Title IV-A encompasses three broad program priorities that are intended to improve students' academic achievement by increasing districts' capacity to (1) provide all students with a well-rounded education, (2) ensure that the school environment is conducive to learning, and (3) enhance and personalize learning through technology. The law also requires districts to consult with stakeholders, distribute Title IV-A funds to high-need schools, and in certain instances, to conduct comprehensive needs assessments, and it encourages districts to use evidence from research to pick strategies to fund. This evaluation will develop a national picture of how states and districts are implementing this program, particularly the ways in which it supports school systems as they seek to recover from the coronavirus pandemic during the 2021–2022 school year.

A.2. Purposes and Use of the Information Collection

IES has contracted with Abt and its partner, RMC Research Corporation to conduct this study. The study will collect data starting in Spring 2022 and will ask about school year 2021-22 activities (from FY 2021 funds that became available in July 2021) to answer and report on the following questions:

- 1. What guidance and technical assistance did states provide to districts to assist in local implementation of the Title IV-A program?** What supports did the state provide to help districts effectively assess their needs? What resources did the state provide to help districts select evidence-based programs or activities? Did states provide technical assistance or encourage work in specific topic areas? To what extent did the state use the national technical assistance center? What challenges did states and districts encounter during implementation?
- 2. How do districts decide how to use Title IV-A funds?** How are districts assessing their needs? To what extent do they use stakeholder feedback and needs assessments to select the topic areas to fund? What resources do they consult to select particular programs or activities? Do they rely on resources focused on identifying evidence-based programs or activities?
- 3. What are the primary services and activities districts are implementing with Title IV-A funds?** Do districts transfer their Title IV-A funds to other federal programs or supplement them with funds from other programs? What is the proportion of funds used across the three Title IV-A main program priority areas? What topic areas are most often supported? Within each topic area, what are the funds used for – purchasing curricula, professional development, or technological supports? Do districts target high-poverty, low performing, or persistently dangerous schools? To what extent is information from the needs assessment consistent with what is implemented?

ED plans to use the study results to learn about districts' decision-making process for use of Title IV-A funds, how states help inform districts' decisions, and what topic areas and activities are funded with Title IV-A funds. Because there is no standardized reporting requirement for Title IV-A sub-grantees at the federal level, this study also will help inform technical assistance.

A summary of the purpose of each type of data collection is described below.

1. Survey of the Census of State Title IV-A Coordinators. A web-based survey in the Spring of 2022 will be administered to 52 state Title IV-A coordinators, including representatives from Washington, DC and Puerto Rico. To gain knowledge about how SEAs are supporting Title IV-A grants, the state survey will provide information on how SEAs use these funds, and the support and technical assistance SEAs provide to districts in their use of these funds, including for conducting needs assessments, engaging stakeholders, selecting evidence-based programs and practices, and using funds for particular topics. The developed survey instrument draws on the research questions, state plans, and ED's 2019 survey of state Title IV-A coordinators.
2. Survey of a Nationally Representative Sample of School Districts. A web-based survey in the Spring of 2022 will be administered to a nationally representative sample of district Title IV-A coordinators, with the possibility of a follow-up survey in Spring of 2024. The initial survey will provide the government with comprehensive information describing funded programs and services, and the decision-making process Title IV-A sub-grantees use to decide how funds should be used and how specific programs and practices are selected. A follow-up survey would provide information on changes in the program within a given sample of districts over time. The survey instrument draws on the research questions and findings from ED's 2019 survey of state Title IV-A coordinators.

A.3. Use of Information Technology and Burden Reduction

Abt will conduct the surveys using an online, internet-accessed survey software. This will allow respondents to take the survey at any time within the window of the data collection period and to submit their responses electronically. There are no paper forms involved in the survey. Features of the online survey include:

- **Secure personalized access.** Each district Title IV-A coordinator will receive a customized link to the survey. The survey software allows respondents to save responses and return to the survey later to finish at their convenience.
- **Automated skip patterns.** Skip logic embedded in the survey will minimize respondent burden by omitting non-applicable questions. This type of programming also reduces entry errors that may require follow-up contacts to gather correct information.
- **Automated validation checks.** The software will check for allowable ranges for numeric questions, minimizing out-of-range or unallowable values. This type of programming also reduces entry errors that may require following up with contacts to gather correct information.
- **Closed-ended questions.** These types of questions reduce burden on respondents and facilitate data analysis. A small number of "other" options will be included to ensure respondents have an opportunity to enter information that does not fit pre-existing options.

A.4. Efforts to Identify Duplication

The study team is using existing data and information that are available to inform the design of the study. We will build on the findings from previous surveys of state and district Title IV-A coordinators, including an ED-funded survey of state coordinators fielded in summer 2019 (under OMB control number 1875-0290 and a district survey administered by the School Superintendents Association (AASA) in 2018 and 2019. Both of these prior data collection efforts occurred pre-pandemic. In addition, ED's 2019 survey only included state responses and the AASA study is based on a convenience sample of districts that includes a higher proportion of districts that reported receiving over \$30,000 than those in the national population (54 percent versus 34 percent, respectively). The new data collection effort will

provide more up-to-date information from a nationally representative sample of districts. It also will include a broader set of research questions.

To avoid duplication the study team is coordinating with implementation studies of other IES implementation studies (the Individuals with Disabilities Education Act (IDEA); Elementary and Secondary Education Act (ESEA) Titles I, II, and III; and the cross-cutting Study of District and School Uses of Federal Education Funds).

A.5. Efforts to Minimize Burden in Small Businesses

No information for this study will be collected from small businesses.

A.6. Consequences of Not Collecting the Information

Currently there is no standardized reporting requirement for Title IV-A sub-grantees at the federal level. Without the information collection, ED and Congress will not know whether the new Title IV-A program is providing the appropriate flexibility and requirements (e.g., need assessment, funding requirements) to enable districts to meet the needs of their students.

A.7. Special Circumstances Justifying Inconsistencies with Guidelines in 5 CFR 1320.6

There are no special circumstances for the proposed data collection efforts. None of the above special circumstances apply.

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

Federal Register Announcement

A 60-day notice to solicit public comments was published in the Federal Register on July 26, 2021 (Vol. 86, No. 140, p. 40028).

The Department received [11 public comments](#). Ten comments were not relevant and had to do with a different request, a *Request for Information Regarding the Public Service Loan Forgiveness Program* (Docket No. ED—2021—OUS—0082). That request notice immediately followed this one (Docket No. ED–2021–SCC–0110) in the Federal Register and may have caused some confusion in the comment submissions.

However, the Department did receive one set of relevant comments from the [Title IV-A Coalition](#). The comments were helpful and offered additional information and insights for survey refinement. We have provided responses to the Title IV-A Coalition’s comments on the state and district surveys below.

1. *Allocation level for FY 2019 and FY 2020.* For clarification, the surveys will focus on the FY 2021 allocation levels, which aligns with the current 2021–22 school year.
2. *Combining Title IV-A dollars with other funding streams.* The survey was revised to ask whether Title IV-A funds were the primary source of funds for activities in each of the three program content areas (District Survey Question #11).
3. *Transferring of funds.* For clarification, the surveys will ask whether funds were transferred into or out of each eligible Title program, and if so, the amount of funds transferred (State Survey, Questions #1 to 4 and District Survey, Questions #4 to 7).
4. *Use of funds in each of the three program content areas.* For clarification, the surveys will ask about the amount of funds for each of the program content areas (State Survey, Question #6 and District Survey, Question #10).

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5. *Needs assessment requirement and stakeholder engagement.* For clarification, the surveys will ask respondents whether they conducted a comprehensive needs assessment, and if so, in what years (District Survey, Questions #12 and 13). Based on each district's allocation level, the study will determine whether it was a federal requirement. The surveys will also ask which stakeholders were consulted about the use of Title IV-A funds and the importance of their feedback in decision making (District Survey, Questions #14 to 16).
 6. *Recommended topic areas under Well-Rounded Education, Safe and Healthy Students, and the Effective Use of Technology.* We appreciated the detailed lists of recommended topics under each content area. To minimize respondent burden, it is important to include more streamlined lists while still covering all major topic areas. However, based on the suggestions, we added a few topics that were not already covered and refined some of the areas to ensure key information is included (District Survey, Questions #19, 23, and 27). The survey will also allow respondents to specify other topics that were not already listed.
 7. *Use of Title IV-A dollars to scale up or expand upon existing initiatives and/or to fund new initiatives.* For each content area, the survey was revised to ask respondents whether they used their Title IV-A funds to fund new activities or to supplement existing activities (District Survey, Questions #20, 24, and 28).
 8. *Aspects of Title IV-A that are most and least useful.* The survey was revised to ask about program flexibilities (District Survey, Questions #17 and 18). The surveys will also ask about the importance of various factors in determining how to spend their Title IV-A funds and about challenges in program implementation (District Survey, Questions #15, 16, and 33).
 9. *Open-ended narrative about the importance of Title IV-A funds.* In order to collect standardized data across districts, the survey will not include any narrative items.

Consultations Outside the Agency

The study team has formed an external technical working group in partnership with ED to provide guidance on the study design, instrumentation, and data collection for the study. The technical working group includes the following 8 members:

- Dr. Catherine Bradshaw, University of Virginia (bullying and school climate; children with emotional and behavioral disorders and autism; and design, implementation, and evaluation of evidence-based prevention programs in schools)
- Ms. Tammy Giessinger, Colorado Title IV Director (Title IV administration)
- Dr. Allyson Holbrook, Professor Public Administration, University of Illinois Chicago (survey methodology)
- Ms. Laura Jimenez, Director of Standards and Accountability, Center for American Progress (college and career readiness, policy for key K-12 education initiatives)
- Dr. Glenn Kleiman, Professor at the College of Education and Senior Faculty Fellow at the Friday Institute for Educational Innovation, North Carolina State University (technology-enabled innovations in education)
- Mr. Asheesh Misra, Director of Curriculum Development, 2U (digital education solutions, International Baccalaureate programs, teacher efficacy and equity for underrepresented students)
- Mr. Bill Modzeleski, Senior Consultant, SIGMA Threat Management Associates and the former Associate Assistant Deputy Secretary of the Department's Office of Safe and Drug Free Schools (juvenile justice and delinquency prevention and drug prevention)

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- Dr. Levi Patrick, Former Oklahoma Title IV Coordinator, Director of Secondary Mathematics Education, Oklahoma State Department of Education (science and mathematics education)

The study team convened the technical working group in July 2021 to review the study design and ensure the study provides information that policymakers and school districts can use to improve the Title IV-A program. The study team plans to convene the technical working group again before the public release of the final report.

A.9. Payment or Gift to Respondents

No payments to respondents are proposed for this information collection.

A.10. Assurance of Confidentiality

Abt has established procedures to protect the confidentiality and security of its data. This approach will be in accordance with all relevant regulations and requirements, in particular the Education Sciences Institute Reform Act of 2002, Title I, Subsection (c) of Section 183, which requires that the director of IES “develop and enforce standards designed to protect the confidentiality of persons in the collection, reporting, and publication of data.” The study also will adhere to requirements of Subsection (d) of Section 183, which prohibit disclosure of individually identifiable information, as well as make the publishing or inappropriate communication of individually identifiable information by employees or staff a felony.

The study team will protect the full privacy and confidentiality of all people who provide data. The study will not have data associated with personally identifiable information (PII), because study staff will be assigning random ID numbers to all data records and then stripping any PII from those records. Other than the names and contact information for the survey respondents, which is information typically already available in the public domain on state and district websites, no data collected for surveys will contain PII. No names or contact information will be released. In addition to the data safeguards described here, the study team will ensure that no respondent names are identified in publicly available reports or findings, and, if necessary, the study team will mask distinguishing characteristics. The following statement will be included with all requests for data:

“Abt Associates follows the confidentiality and data protection requirements of the U.S. Department of Education’s Institute of Education Sciences (The Education Sciences Reform Act of 2002, Title I, Part E, Section 183). Responses to this data collection will be used only for research purposes. The reports prepared for the study will summarize findings across the sample and will not associate responses with a specific district, school, or individual. We will not provide information that identifies respondents to anyone outside the study team, except as required by law.”

The state Title IV-A coordinator survey will also include the following statement:

“Please note that data on state policies and resources/supports may be reported by state. Thus, while personally identifiable information about individual respondents will not be released, data displayed by state could be attributed to the state agency or possibly an individual respondent.”

Abt will also take several steps to safeguard respondent information:

1. All project staff will be instructed in the privacy requirements of the study.
2. Access to any data with identifying information will be limited to contractor staff directly working on the survey and will require individual usernames and passwords.

3. Names and other identifying information for survey respondents will be replaced with numerical identifiers after the data are collected and prior to analysis. A key linking the names to the identifiers will be kept in a separate location with access for Abt staff on a need-only basis.
4. When study data are transferred to ED, all data will be de-identified.

All data collection instruments and procedures will be reviewed by Abt’s Institutional Review Board.

A.11. Questions of a Sensitive Nature

The study will not include any questions of a sensitive nature.

A.12. Estimate of Response Burden

Exhibit 1 presents the estimated annual response burden to participants. In 2022, Abt will conduct 20-minute surveys with the 52 state Title IV-A coordinators. We will also administer surveys to approximately 965 district Title IV-A coordinators, and we may also conduct a 2-year follow-up survey with the same set of district coordinators as part of an optional task. The district Title IV-A coordinator survey is estimated to take approximately 30 minutes to complete. Because this is a three-year clearance, total burden is divided by 3.

Exhibit 1. Estimated Annual Response Burden in Hours

Respondent Type	Time per Response (Hours)	Number of Responses	Number of Respondents	Total Time Burden (Hours)	Annual Time Burden (Hours)
STATE SURVEYS					
State Title IV-A coordinator	.33	52	52	17.2	5.7
DISTRICT SURVEYS					
District Title IV-A coordinator (2022 and 2024 optional)	0.5	1,930	965	965	321.7
TOTAL		1,982	1,017	982.2	327.4
(Annualized Total)		(661)	(339)	(327.4)	

To compute the total estimated annual cost, the total burden hours were multiplied by the average hourly wage for each participant type. The median annual salary for state and district administrators was estimated to be \$98,440 based on the Bureau of Labor Statistics, Occupational Employment and Wage estimates (May 2017). The annual cost burden for new data collection for this ICR should not exceed \$15,495 (see Exhibit 2).

Exhibit 2. Estimated Annual Cost to Respondents

Respondent Type	Annual Salary Estimate	Average Hourly Wage	Time per Response (Hours)	Cost per Response	Number of Responses	Total Cost for Responses	Annual Cost for Responses
STATE SURVEYS							
State Title IV-A coordinator ¹	\$98,440	\$47	0.33	\$16	52	\$812	\$271
DISTRICT SURVEYS							
District Title IV-A coordinator (2022 and 2024 optional)	\$98,440	\$47	0.5	\$24	1,930	\$45,670	\$15,223
TOTAL					1,982	\$46,482	\$15,495
(Annualized Total)					(661)	(\$15,495)	

¹ The salary estimates for state and district Title IV-A coordinators and principals are based on US Bureau of Labor Statistics data on Occupational Employment and Wages, May 2017: 11-9032 Education Administrators, Elementary and Secondary School; see <https://www.bls.gov/oes/2017/may/oes119032.htm>.

A.13. Estimate of Total Capital and Startup Costs/Operation and Maintenance Costs to Respondents or Record-Keepers

There are no total capital or start-up costs to respondents or record-keepers resulting from the collection of information. There are also no total operation, maintenance, or purchase of services costs to respondents or record-keepers resulting from the collection of information other than the time spent responding to the survey.

A.14. Estimate of Costs to the Federal Government

ED contracted with Abt Associates (Abt) and its partner, RMC Research Corporation, to conduct a study of the implementation of the Title IV-A grants. The estimated cost to the Federal Government for the study is \$459,624.18 per year.

A.15. Changes in Burden

This is a new data collection.

A.16. Plans for Analysis, Publication, and Schedule

The primary goal of this data collection is to describe the implementation of Title IV, Part A program. The data collection activities will provide nationally representative descriptive information on the guidance and technical assistance states provide to districts to assist in local implementation of the Title IV-A program, the ways in which districts decide how Title IV-A funds should be used, and the types of services and activities that districts implement with Title IV-A funds.

To achieve this goal, descriptive analyses will be conducted using survey data. We anticipate that relatively straightforward descriptive statistics (e.g., means, frequencies, and percentages) and tests for significant differences (e.g., t-test, chi-square, ANOVA) will typically be used to answer the research questions detailed in section A.2 above. The study is descriptive and not designed to estimate the impact of federal policies on state and local actions.

Cross-tabulations will be important to answer questions about variation across state and district characteristics. The primary characteristics of interest for the cross-tabulations are:

- District poverty level: Poverty is included because the allocation method for Title IV, Part A follows the Title I formula. Title I funds are specifically intended to ameliorate the effects of poverty on local funding constraints and educational opportunity.
- District urbanicity: Urbanicity is included because of the relationship between educational opportunity and rural isolation and the concentration of poverty in urban schools.
- Grant amount: The amount of the grant is important for this program because grants greater than or equal to \$30,000 have more program requirements than grants under \$30,000.

Because of the use of a statistical sample, survey data presented for districts will be weighted to national totals (tabulations will provide standard errors for the reported estimated statistics). In addition, the descriptive tables will indicate where differences between subgroups are statistically significant. We will use Chi-Square tests to test for significant differences among distributions and *t*-tests for differences in means.

The primary method will be to report point-in-time estimates of mean values for state and district data. For state data, the study will report numbers of states and unweighted means. For district data, the study

will report weighted means. Weights will reflect the probability of selection for districts, with adjustments for survey nonresponse as needed.

The study report is expected to be published in 2023. If an additional round of surveys is administered two years later, a second report is expected to be published in 2025. The report will be available on the IES website and will be short (15-pages or fewer), with a set of technical appendices. The report will be written for a broad audience. The study team will work closely with IES on approaches for communicating the most useful information. The report will follow the recent January 2020 IES Style and Report guidance and meet all 508 compliance requirements.

A.17. Approval to Not Display Expiration Date

Not applicable. All data collection instruments will include the OMB data control number and data collection expiration date.

A.18. Exceptions to Item 19 of OMB Form 83-1

No exceptions are necessary for this information collection.