Tracking and OMB Number: 1810-0724

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

1. **Explain the circumstances that make the collection of information necessary. What is the purpose for this information collection? Identify any legal or administrative requirements that necessitate the collection. Include a citation that authorizes the collection of information. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, list the sections with a brief description of the information collection requirement, and/or changes to sections, if applicable.**

   The Consolidated State Performance Report (CSPR) is the required annual reporting tool for each State, the Bureau of Indian Education, District of Columbia, and Puerto Rico as authorized under Section 8303[1] of the Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA). The CSPR collects data on programs authorized by:
   - Title I, Part A;
   - Title I, Part C;
   - Title I, Part D;
   - Title II, Part A;
   - Title III, Part A;
   - Title V, Part A;
   - Title V, Part B, Subparts 1 and 2; and
   - The McKinney-Vento Act.

   The information proposed for collection relate to the performance and monitoring activities of the aforementioned programs and are needed for reporting on GPRA as well as other reporting requirements under ESSA.

   This submission is a request to revise the currently-approved CSPR collection (OMB 1810-0724) for school years 2022-23, 2023-24, and 2024-25. There are three substantive changes to the collection since it was last approved:
   a. Revising the structure and standardizing the language of the CSPR across sections to create consistent language, remove duplication or redundancies in the guidance, and to reduce text that will be added to technical assistance documents
   b. Reducing the number of tables containing Title I, Part A, Title I, Part C, and McKinney-Vento Act data
   c. Moving the State Report Cards section from CSPR Part I to CSPR Part II

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 general, the Department uses the information derived from the CSPR to: (1) monitor and report its progress in meeting *Strategic Plan* goals; (2) assess and report individual program performance; (3) monitor States' implementation of the ESEA and the extent to which States are meeting program and accountability goals; (4) identify areas for technical assistance to States and overall program improvement; (5) inform policy and program improvement; and (6) inform other reporting and program evaluation requirements.

The program office will use the information to monitor compliance and to obtain a clear understanding of the needs of States to inform program office technical assistance initiatives.

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 responses are collected electronically via a data collection tool. Over 70% of CSPR questions are populated with data already approved by OMB via the ED*Facts* Data Collection (OMB Control Number: 1850-0925). These CSPR questions are not included within the form.

   The questions within the form are considered "manual entry" and values are entered into fields in a separate reporting tool. Once states have completed their submission, they electronically certify that it is accurate.

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.**

   In order to reduce duplication of information, the majority of the questions in the CSPR are pre-populated with data from ED*Facts*.

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.**

Small businesses or other small entities are not impacted.

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 includes information necessary for a report to Congress that is required to be submitted on an annual basis and GPRA data that is required to be collected for multiple grant programs. If the information is not collected, data on key aspects of elementary and secondary education programs will not be available. Consequently, the Department would be unable to meet statutory and regulatory requirements for collection and reporting of data on grantees' activities and outcomes.

   The information collected is used to provide data on education to the public through websites, such as ED Data Express, one of the Department's initiatives under the Department's Open Government Plan, and ad-hoc reports for education researchers. Data informs monitoring and technical assistance efforts.

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.**

No special circumstances exist that would cause the information collection to be conducted under any of the circumstances described above.

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

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

   For the 30 day notice, indicate that a notice will be published.
   Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

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

   Individual program offices and principal offices consult with State officials, SEA leadership, and CSPR and ED*Facts* coordinators on their information collections. Consultations occur through ongoing program monitoring and technical assistance, program related conferences, data conferences, Webinars and teleconferences, which enable ED to ascertain the availability and quality of the required data.

   On June 10, 2022, a Federal Register notice requesting public comment was published (Vol. 87, No. 112, page 35534). During the 60-day comment period, we received 10 comments from the public. We have responded to comments and discuss the changes to the collection in a separate document.. We are now publishing the applicable 30-day Federal Register notice to request public comment.

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

No payment or gift of any kind will be provided to respondents.

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 data collected through the CSPR are aggregated and contain no individual student-level data. However, the data are still protected in accordance with the requirements of the Family Educational Rights and Privacy Act (FERPA). As a matter of policy ED assures respondents that in reporting data to the public, no n-size will be used that can readily identify sensitive information about individuals, alone or in combination with other data. The n-size used to redact values below which individual students could be identified is based on a methodology developed in coordination with and approved by the U.S. Department of Education's Disclosure Review Board, and it is used in combination with other privacy protection methodology to ensure compliance with FERPA.

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.

The information collection does not include questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The education data collected will only consist of information about states, school districts, and schools.

[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)

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 average estimated burden is 35.5 hours per state education agency (SEA) and 1.0 hour per local education agency (LEA). The total estimated burden for all SEAs is 1,881.5 hours (35.5 hours x 53 SEAs) and for all LEAs is 14,600 hours (1.0 hour x 14,600 LEAs). The estimated total burden for respondents will not change from the previous submisson (i.e, 16,481 hours). This estimate will vary by respondent depending on their data management and reporting processes for completing the CSPR.

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)
Consolidated	N/A		53	53	35.5	1,881.5	$38.91	$73,209.17

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)
State Performance Report (State Education Agency)						0		
Consolidated State Performance Report (Local Education Agency)	N/A		14,600	14,600	1.0	14,600	$38.91	$568,068
Annualized Totals			14,653	14,653		16,481		$641,277.17

The average estimated burden is 35.5 hours per state education agency (SEA) and 1.0 hour per local education agency (LEA). The total estimated burden for all SEAs is 1,881.5 hours (35.5 hours x 53 SEAs) and for all LEAs is 14,600 hours (1.0 hour x 14,600 LEAs). The estimated total burden for respondents will not change from the previous submisson (i.e, 16,481 hours). This estimate will vary by respondent depending on their data management and reporting processes for completing the CSPR.

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 :

There is no additional annual cost burden to respondents and record keepers from this 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 annual cost to the Federal government, beyond the efforts normally associated with Department staff conducting program monitoring, would be to review the submitted data that each State submits to complete their CSPR.

The Department estimates the following: ten people, GS-13, two hours, X 53 SEAs = 1,060 hours X 45.42 per hour=$48,145.20.

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 burden remains the same per SEA.

	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)			

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.**

    In conjunction with the modernization of the EDFacts collection system, the CSPR will likely adjust timelines by one to two months to align with their processes and reduce state and program office review burden. An estimated timeline would be as follows: SEAs will be asked to submit Part I of the SY 2022-23 CSPR to the Department in January 2024. Part II of the CSPR will be due in March 2024. After State submissions have been received, ED program staff will conduct a data quality review. During the review, SEAs will have the opportunity to correct and resubmit final data. Data quality review for Part I will be completed by May 2024. Part II data quality review will be completed in June 2024. After final data have been certified by SEAs, ED will ensure that appropriate privacy protections have been applied to the data. Once the documents are ready, ED will publish each SEA's CSPR on our website at eddataexpress.ed.gov. Reports will be posted in summer and fall 2024.[2]

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.**

    Approval to not display expiration date has not been requested.

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

    No exceptions were identified.

[1] SEC.8303. Consolidated Reporting – (a) In general: In order to simplify reporting requirements and reduce reporting burdens, the Secretary shall establish procedures and criteria under which a State educational agency, in consultation with the Governor of the State, may submit a consolidated State annual report. (b) Contents: The report shall contain information about the programs included in the report, including the performance of the State under those programs, and other matters as the Secretary determines are necessary, such as monitoring activities. (c) Replacement: The report shall replace separate individual annual reports for the programs included in the consolidated State annual report.

[2] The exact dates are subject to change.