
**Supporting Statement for
OMB Clearance Request**

Part A

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

**Revision to reflect Congress's
creation of the Bipartisan Safer
Communities Act (BSCA)-
Stronger Connections (SC)
Grant Program**

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Part A: Justification

The Institute of Education Sciences (IES), U.S. Department of Education (the Department) requests clearance for a revision to a data collection that OMB approved on March 30, 2022, for the National Implementation Study of Student Support and Academic Enrichment Grants (Title IV, Part A).¹ The goal of the study is to develop a national picture of how states and districts are implementing the Title IV-A program. Survey data were collected from states and districts in the spring and summer of 2022, as intended. OMB also approved an optional follow-up district survey. However, since OMB cleared this data collection, the Title IV-A program was significantly impacted by the Bipartisan Safer Communities Act (BSCA), which provides an additional \$1 billion in Stronger Connections grants (SC) via Title IV-A to enhance states' and districts' ability to address acute school safety and student mental health needs in the aftermath of the coronavirus pandemic. To better align the study's data collection plans and timeline to this recent development—Congress passed BSCA in June 2022, with funds only starting to flow to states in the fall—IES is requesting approval to conduct a follow-up state survey in lieu of the previously-approved optional district survey. No other changes are requested.

A.1. Circumstances Making the Collection of Information Necessary

The justification for the 2022 data collection was detailed in the original approved Supporting Statement. To briefly recap, Title IV-A of the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (ESSA), 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 purpose of the data collection was to understand how states and districts were implementing the Title IV-A program, particularly the ways in which it supported school systems as they sought to recover from the pandemic during the 2021–2022 school year. To date, the study has completed fielding and analyses of the 2022 approved surveys of state and district Title IV-A coordinators, with findings expected to be released in 2024.

Congress's passage of BSCA in June 2022 provided additional funding for activities authorized by Section 4108 of the Title IV-A program. Via Title IV-A and BSCA-SC, state educational agencies were to award competitive subgrants to high-need local educational agencies to promote safer, more inclusive learning environments and support the social, emotional, physical, and mental health of students. There is strong interest from the Department and Congress to understand how quickly and effectively states have distributed these funds and what kinds of needs have been targeted by the subgrant competitions. The best way to address this need is through a follow-up state survey of Title IV-A coordinators in late fall 2023/early winter 2024 since most will have recently awarded BSCA-SC funds to districts at the time the survey is administered. But because awarded districts will not yet have had time to use their BSCA-SC funds, it is likely too soon to follow-up with a district survey of Title IV-A coordinators. Thus, this package requests approval to revise the study's original data collection activities, approved in March 2022, by replacing the optional follow-up survey of a representative sample of district Title IV-A coordinators with a follow-up survey of the census of state Title IV-A coordinators. Doing so would enable IES to generate timely, policy-relevant information on how quickly states have been able to set-up competitions using Title IV-A BSCA-SC funds and to what extent they are following the Department's recommendations for directing these funds to districts in the first year of the program.

¹ OMB control number 1850-0968 (https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202107-1850-005)

A.2. Purposes and Use of the Information Collection

The purpose and use of data from the 2022 surveys was detailed in the original approved Supporting Statement and remains the same. To study the new BSCA-SC program, as part of Title IV-A implementation, the study team, Abt Associates (Abt), with which IES has contracted to conduct this evaluation, will administer a *2023-24 Follow-up Survey of State Title IV-A Coordinators*. Information requested in this survey will answer the following questions:

1. Given the urgency of signing the Bipartisan Safer Communities Act (BSCA) into law, how quickly did states award Stronger Connections (BSCA-SC) subgrants to districts?
2. To what extent did states define high-need districts using criteria that the Department recommended in its guidance to states?
3. Did states set key priorities for districts' use of BSCA-SC subgrant funds that reflect the Department's recommended use of funds?
4. What challenges have states faced in carrying out BSCA-SC's requirements and the Department's recommendations?

The study team will administer the survey to 50 state Title IV-A coordinators, including representatives from the 48 contiguous states, the District of Columbia, and Alaska. The state educational agencies (SEAs) in these 50 states were required, under the BSCA legislation, to award competitive BSCA-SC subgrants to high-need districts. Six other states and territories were not subject to these same BSCA requirements – Hawaii, Puerto Rico, and the Outlying Areas (American Samoa, Commonwealth of the Northern Mariana Islands, Guam, and the Virgin Islands) – so will be excluded, given this survey's focus on the characteristics of competitions and definitions of high need.² This survey is a logical follow-up to the survey that state Title IV-A coordinators completed in 2022 and will provide timely information about new uses of funds:

- The 2022 survey of state Title IV-A coordinators asked how states issued guidance to districts and supported districts in using their Title IV-A funds for all three categories of activities authorized under Title IV-A of the ESEA: (1) supporting well-round educational opportunities (section 4107), (2) supporting safe and healthy students (section 4108), and (3) supporting the effective use of technology (section 4109). The allowable activities for which states and districts may use BSCA-SC funds overlap with the category of supporting safe and healthy students (section 4108), and the 2023-24 survey will ask what guidance states issued for districts' use of BSCA-SC funds. Of particular policy interest is whether states prioritized some of the activities allowable under section 4108 over others.
- While states award Title IV-A funds to all districts using a funding formula, under BSCA, states were required to award funds to “high-need” districts on a competitive basis. Because states had flexibility to determine how they would define “high-need,” it is important to understand how they did so and more generally how they held competitions to identify which districts would receive BSCA-SC funds.
- States receive regular Title IV-A funds annually and can transfer the funds between programs authorized under ESEA (as amended by ESSA). By contrast, BSCA-SC funding resulted from a one-time Congressional appropriation augmenting Title IV-A, and states and districts may use the

² IES anticipates coordinating data collection from these six states and territories with the Department's Office of Elementary and Secondary Education or collecting data under a separate data collection effort in the future. IES will seek OMB clearance for that data collection separately, as needed. These six states and territories are not required to award BSCA-SC subgrants competitively to high-need districts, so the questions in the current follow-up survey do not apply to them.

funds from September 2022 through September 2026, though Congress emphasized that states and districts should begin using the funds as quickly as possible. The 2023-24 follow-up survey will explore important questions about how urgently states have distributed BSCA-SC funds to districts, and whether states held a single competition or planned multiple rounds to award subgrants to districts, in the context of states' administration of their regular Title IV-A funds.

A.3. Use of Information Technology and Burden Reduction

Following similar procedures used to reduce burden on participants in the 2022 state and district surveys, Abt will conduct the follow-up state survey using an online, internet-accessed survey software that allows respondents to take the survey at any time within the window of the data collection period and submit their responses electronically. There are no paper forms involved in the survey. Features of the online survey that minimize burden include:

- **Secure personalized access.** Each state 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 from the state BSCA-SC grant award notification (GAN) assurances and the 2022 Survey of the Census of State Title IV-A coordinators to inform the design of the proposed follow-up state survey. Using internet search engines, the study team has also retrieved information that some states have posted publicly about their competitions for districts to apply for BSCA-SC funding. By using these existing data sources to design the survey, the study team can avoid unnecessary duplication. This follow-up state survey represents the first attempt to systematically collect data from states about their distribution of BSCA-SC funds.

A.5. Efforts to Minimize Burden in Small Businesses

No information for the follow-up state survey will be collected from small businesses.

A.6. Consequences of Not Collecting the Information

Congress passed the BSCA legislation to respond to an urgent need to reduce the risk of violence in schools and communities in light of a national tragedy and a perception that the risks are ever greater coming out of the pandemic. The proposed data collection will help the Department and Congress understand how states are using their BSCA-SC funds to implement or enhance strategies that are fundamental to meeting a key goal of the Title IV-A program (providing students with safer and healthier learning environments). Without the information collection, the Department and Congress will not know how quickly states have awarded subgrants to districts, nor how states have defined "high-need" districts,

conducted subgrant competitions, or set priorities for districts’ use of subgrant funds. IES’s request to pivot to collect information from states one year after they received their BSCA-SC grant allocation (instead of conducting a follow-up district survey) reflects a compelling need to assess the extent to which states are meeting the intended goals of the legislation.

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

The study team published a 60-day notice to solicit public comments on the *2023-24 Follow-up Survey of State Title IV-A Coordinators* regarding SEAs distribution of BSCA-SC funds on July 10, 2023, in the Federal Register (Vol. 88 No. 130 pp. 43558). The Department received one public comment that was not substantive.

The [original, approved information clearance request](#) includes details about the study team’s response to public comments received in response to the 60-day notice published in the Federal Register on July 26, 2021 (Vol. 86, No. 140, p. 40028).

Consultations Outside the Agency

As described in the [original information clearance request](#), the study team consulted with an 8-member external technical working group on the study design, survey development, and data collection plans (Exhibit 1). Further consultations with the technical working group are anticipated as the data are being analyzed and reports on study findings are being drafted.

Exhibit 1. Expert Technical Working Group Members

Name, Affiliation	Expertise
Dr. Catherine Bradshaw , University of Virginia	Bullying and school climate; Children with emotional and behavioral disorders and autism; 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 , Senior Advisor in the Office of Elementary and Secondary Education of the U.S. Department of Education and former 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; 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; Delinquency prevention and drug prevention
Dr. Levi Patrick , Former Oklahoma Title IV Coordinator, Director of	Science and mathematics education

Name, Affiliation	Expertise
Secondary Mathematics Education, Oklahoma State Department of Education	

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 assign random ID numbers to all data records and then remove 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 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 the requests for information:

“Information collected for this survey comes under the confidentiality and data protection requirements of the 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 by the U.S. Department of Education, its contractors, and collaborating researchers only for statistical purposes. While individual states may be identified in reporting, individual respondents will not be identified. The study has been approved by the federal Office of Management and Budget (OMB No. XXXX-XXXX). We will not provide information that identifies respondents to anyone outside the study team, except as required by law.”

The *2023-24 Follow-up Survey of State Title IV-A Coordinators* 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 receive instruction 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.

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3. The study team will replace names and other identifying information for survey respondents 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. Before study data are transferred to the Department, the study team will de-identify all data.

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 2 presents the estimated annual response burden to participants, including the original annual response burden and the changes in burden that result from eliminating the optional 2024 District Title IV-A coordinator survey and replacing it with a *2023-2024 Follow-up Survey of State Title IV-A Coordinators*.

Exhibit 2. 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)
ORIGINAL					
State Title IV-A coordinator (2022)	0.33	52	52	17.2	5.7
District Title IV-A Coordinator (2022, optional 2024)	0.50	1,930	965	965	321.7
TOTAL		1,982	1,017	982.2	327.4
(Annualized Total Over 3 Years)		(661)	(339)	(327.4)	
REVISED					
State Title IV-A coordinator (2022)*	0.33	52	52	17.2	5.7
District Title IV-A Coordinator (2022)*	0.50	965	965	483	161
State Title IV-A coordinator (2023-24)	0.33	50	50	16.5	5.5
TOTAL		1,067	1,067	516.7	172.2
(Annualized Total Over 3 Years)		(356)	(356)	(172.2)	

* Data collection has already been completed.

Exhibit 3 shows the estimated annual cost to participants, including the original estimated costs and the revised estimates that result from the proposed change in data collections for 2023-2024. 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 administrators was estimated to be \$102,760 based on the Bureau of Labor Statistics, Occupational Employment and Wage estimates (May 2022).

Exhibit 3. 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 (Over 3 years)
ORIGINAL							
State Title IV-A coordinator (2022) ³	\$98,440	\$47	0.33	\$16	52	\$812	\$271
District Title IV-A Coordinator (2022, optional 2024)	\$98,440	\$47	0.5	\$24	1,930	\$45,670	\$15,223
TOTAL					1,982	\$46,482	\$15,495
(Annualized Total Over 3 Years)					(661)	(\$15,495)	
REVISED							
State Title IV-A coordinator (2022)*	\$98,440	\$47	0.33	\$16	52	\$812	\$271
District Title IV-A Coordinator (2022)*	\$98,440	\$47	0.5	\$24	965	\$22,835	\$7,612
State Title IV-A coordinator (2023-24) ⁴	\$102,760	\$49.40	0.33	\$16	50	\$815	\$272
TOTAL					1,067	\$24,462	\$8,154
(Annualized Total Over 3 Years)					(356)	(\$8,154)	

³ The salary estimate for state Title IV-A coordinators used in the original submission was based on US Bureau of Labor Statistics data on Occupational Employment and Wages May 2021: 11-9032 Education Administrators, Kindergarten through Secondary; see https://www.bls.gov/news.release/archives/ocwage_03312022.pdf

⁴ The salary estimate for state Title IV-A coordinators is based on US Bureau of Labor Statistics data on Occupational Employment and Wages May 2022: 11-9032 Education Administrators, Kindergarten through Secondary; see <https://www.bls.gov/oes/current/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

The proposed revision to the originally-approved package, including the elimination of the optional 2024 follow-up survey of district Title IV-A coordinators and the addition of the *2023-24 Follow-up Survey of State Title IV-A Coordinators*, represent a net change of \$0 in estimated cost to the Federal Government. The estimated annual cost to the Federal Government for the study continues to be \$459,624.18.

A.15. Changes in Burden

Exhibit 2 shows the estimated change in response burden to participants resulting from eliminating the 2024 District Title IV-A coordinator survey and adding a 2023-2024 State Title IV-A coordinator survey. The net change is a reduction from 982.2 hours to 516.7 hours across the three-year study period. The study has completed administration of the 2022 State Title IV-A coordinator survey and the 2022 District Title IV-A coordinator survey. Under the proposed change in data collection, the revised estimate of burden to district coordinators is approximately one-half of the original estimate because the study will no longer collect a 2024 follow-up survey of 965 district coordinators. The revised estimate of burden to state coordinators increases from 17.2 hours to 33.7 hours total across the three-year study period because the study will add a follow-up survey of 50 State Title IV-A coordinators.⁵

Exhibit 3 shows the estimated change in annual cost to participants resulting from this proposed revision to the original planned data collections. The new annual estimated cost is reduced from \$15,495 to \$8,154, a net decrease of \$7,341. The annual cost burden for new data collection for this revised ICR should not exceed \$8,154 (see Exhibit 3).

These changes to the original information clearance are a consequence of both a new statute that substantially impacts the Title IV-A program (BSCA) and agency discretion. The Department determined that these changes are both timely and necessary to understand how state educational agencies have responded to a substantial injection of new funding for activities authorized under Title IV-A of the ESEA. It was not possible to anticipate these necessary changes because BSCA was not passed until shortly after approval of the original information clearance.

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

A report of findings from the 2022 surveys of state and district Title IV-A coordinators is currently in preparation and expected to be published in 2024.

As noted previously, the proposed *2023-24 Follow-up Survey of State Title IV-A Coordinators* will provide descriptive information on how quickly states distributed BSCA-SC funds to districts, how states defined “high-need” and selected high-need districts on a competitive basis to receive BSCA-SC funds, whether states set priorities for the types of activities funded with their subgrants, and the challenges states may have encountered. Analyses of survey data will include descriptive statistics (e.g., means, frequencies, and percentages) to answer the research questions described in section A.2. The total number

⁵ Footnote 2, above, describes why the 2023-24 follow-up survey excludes include Hawaii, Puerto Rico, and four outlying areas.

of states included in the survey is small (50 states), so findings will be presented in terms of the number of states, with unweighted means and percentages where applicable. (For example, the average amount of funding states have distributed to districts within the first year after receiving their BSCA-SC allocation, or the average percentage of districts per state that received a BSCA-SC subgrant). Analyses may also include cross-tabulations of survey data with existing NCES data on state characteristics such as enrollment size and region. The study is not designed to estimate the impact of federal policies on state and local actions. Findings are expected to be published in 2025.

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.