Tracking and OMB Number: 1810-0618
Revised: XX/XX/XXXX

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
for District Survey on Use of Funds Under Title II

Background

Title II, Part A (Title II-A) (Supporting Effective Instruction) of the Elementary and Secondary Education Act of 1965 (ESEA) is the key statute through which the federal government provides funds to states and districts to improve the quality and effectiveness of their teachers, principals, and other school leaders through professional development and other activities. The Title II-A program also supports states and districts in recruiting new teachers to the field; encouraging teachers and leaders to remain in education; and providing low-income and minority students with greater access to effective teachers, principals, and other school leaders.

States and districts may choose how to spend their Title II-A funds from a wide range of allowable activities that fit within several major topical areas. These activities support the four program goals: 1) increasing student academic achievement, 2) improving educator quality and effectiveness, 3) increasing the number of effective educators, and 4) providing low-income and minority students with greater access to effective educators.

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 Every Student Succeeds Act (ESSA) places a major emphasis on teacher quality as a significant factor in improving student achievement. Under ESEA, Title II, Part A provides funds to state education agencies (SEAs) and school districts to support effective instruction through preparing, training, and recruiting high-quality teachers, principals, and other school leaders. School districts are provided Title II, Part A state activities funds for this purpose, allowable uses of which include the following:

- Provide high-quality, evidence-based professional development for teachers, principals, and other school leaders.
- Develop and implement initiatives to assist in recruiting, hiring, and retaining effective teachers.
- Recruit qualified individuals from other fields to become teachers, principals, or other school leaders.

- Reduce class size by recruiting and hiring additional effective teachers.
- Develop and implement evaluation systems for teachers, principals, and other school leaders.
- Develop programs to improve the ability of teachers to teach children with disabilities and English learners.
- Provide training to assist teachers, principals, and other school leaders with selecting and implementing assessments, and using data from those assessments.
- Carry out in-service training for school personnel.
- Provide training to support the identification of gifted and talented students.

The Local Educational Agency (LEA) (i.e., district) survey asks districts about the funds they received and how they used Title II, Part A funds to support these activities: hiring, recruiting, and retaining effective teachers; designing or revising educator evaluation systems; reducing class size; and providing professional development.

Results from prior surveys can be found at https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/instruction-state-grants-title-ii-part-a/resources/

The present information collection request is an extionsion request without changes.

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.**

The Department of Education will collect the information annually from a national and state-representative sample of traditional school districts and a nationally representative sample of charter school districts, as well as a brief data request from each SEA to provide a list of their state's allocation of Title II, Part A funds for each sampled district. The information obtained from the survey will provide the Department with a description of how districts use Title II, Part A funds. To the extent possible, the results from the current survey will be compared with those of previous collections. The Department will post the survey results on the program web page. A copy of the proposed data collection instrument is provided in **Appendix A**.

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.**

Respondents will receive a notification letter by email and follow-up reminders, as needed. Respondents will be asked to complete the survey using an online data collection system. To minimize reporting burden, the district surveys will be prepopulated with the amount of funds made available to each district obtained from the allocations requests administered to SEAs. In addition, identifying information for each district from the National Center for Education Statistics Common Core of Data will also be prepopulated into the surveys. The use of prepopulated survey forms reduces burden on the respondents and enhances data accuracy as the forms are submitted.

Web-based surveys reduce errors with built-in edits and decrease the cost for postage, coding, keying, and cleaning of the data. This survey mode also allows respondents to complete the survey at a location and time of their choice. The district survey URL will include embedded login information to reduce the burden of sharing access to the survey within the district if more than one person needs to provide information. Embedding login information eliminates data entry error when accessing the survey.

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

   The information requested in the Study of Title II-A Use of Funds District Survey is only being collected by the existing survey and is not available in other forms. This data collection effort is part of a planned, ongoing data collection to describe the nature of the Title II, Part A program as it is implemented at the district and SEA levels.

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.**

   School districts are the respondents for this data collection. To minimize burden, particularly for small charter school districts, data will be collected via an online survey. In addition, if exact figures are not available, respondents will be asked to provide their best estimates. Small businesses or other small entities are not affected by this effort.

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.**

   It is critical that this data collection be conducted on an annual basis to monitor program implementation, particularly the allowable uses of funds under ESSA. The main consequence of not collecting this Title II, Part A data on an annual basis is that the

Department will not have up-to-date information on how districts are using their Title II, Part A funds and will not meet the reporting requirements under Section 2104(b). This data collection provides information that expands on data collected through the annual SEA survey, which describes activities supported by Title II, Part A program at the state level, (OMB #: 1810-0756, expires 11/30/2026). There are no technical or legal obstacles to reducing burden.

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

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances involved with this data collection. The data collection will be conducted consistently with the guidelines in 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.

   The Department published a 60-day Federal Register Notice on September 30, 2024 (Vol. 89, No. 189, page 79577). We received one non-substantive comment that did not pertain to the ICR and therefore did not warranted a response. The Department is publishing the applicable 30-day Federal Register notice to request public comment.

   No additional outside consultation was sought.

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

   No payments and/or gifts 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,**

[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 –

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.

For the SEA allocation request, the information collected for this study comes under the confidentiality and data protection requirements of the Institute of Education Sciences (Education Sciences Reform Act of 2002, Title I, Part E, Section 183). Responses to this data collection will be used only for statistical purposes, except as required by law. For the LEA survey, the information collected will not be attributed to any LEA; only aggregated date will be reported. The data collected in this survey will provide the Department of Education with important information about how the program supports educators and students. It will also be used as part of the annual budget deliberations in Congress. The Department of Education will publicly report aggregate information on the Title II, Part A Program performance indicators, as required by the Government Performance and Results Act.

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.**

    There are no sensitive questions included in this information collection effort.

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**

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

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.

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)
LEA District Survey			4,400	4,400	3	13,200	$85.06	$1,122,792
SEA Allocation Request			52	52	1	52	$85.06	$4,423.12
Annualized Totals			4,452	4,452		13,252		$1,127,215.12

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.

For the LEA district survey, approximately 80 percent of the 5,000 sampled traditional school districts and 500 sampled charter school districts will submit data via an online survey, for a total number of 4,400 respondents. The study team estimates that the LEA district survey will take an average of 3 hours to complete including any time responding to questions and correcting any errors. For the SEA allocation request, approximately 100 percent of the 52 SEAs (all 50 states, District of Columbia, and Puerto Rico) will submit allocation data via online survey. The request for SEAs to provide Title II, Part A district allocation information will take approximately 1 hour on average. The total annual burden for the Title II LEA survey and SEA allocation request is 13,252 hours with an annual cost of $1,127,215.12. Table 2 displays the burden for the Title II LEA survey and SEA allocation request activities.

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 annualized capital/startup or ongoing operation and maintenance costs associated with collecting the information that is in addition to costs identified in sections A.12 and A.14.

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 contractor, American Institutes for Research (AIR), to collect the data for school year 2024–25, to analyze the data and prepare the report are $836,235.64. These estimates are based on previous experience with the base year data collections.

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

Provide a descriptive narrative for the reasons of any change in addition to completing the table with the burden hour change(s) here.

	Program Change Due to New Statute	**Program Change Due to Agency Discretion**	**Change Due to Adjustment in Agency Estimate**
Total Burden			
Total Responses			
Total Costs (if applicable)			

There is no changes or adjustments from the previous information collection request..

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.**

AIR will submit a report that summarizes the findings from the SEA and LEA surveys. The report will consist of a policy context section, a description of the overarching policy-relevant findings, a summary of the study methodology and limitations, and concise presentation and discussion of key findings. AIR will prepare materials for two in-person or webinar presentations on the results of the surveys for ED review.

The results from the survey will be published in a combined state and district report on the use of funds, similar to the 2022–23 results currently available on the Department's website (https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/instruction-state-grants-title-ii-part-a/resources/). In addition, the data obtained through this data collection will be incorporated into congressional briefings.

The study team anticipates using the same schedule as for previous cycles of this information collection. Districts will be asked to complete the survey in Spring of 2025 regarding school year 2024–25.

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.

The expiration date and OMB control number will appear on the first page of all the information collection materials (top-right corner).

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

The department does not request any exception to the certification statement.