Tracking and OMB Number: 1810-0756

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 U.S. Department of Education (the Department) requests renewal of a clearance to collect data from states annually about how Title II, Part A funds are used, as required by the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act of 2015 (ESSA). The reporting requirements are outlined in ESEA section 2104(a). The OMB control number for the current clearance, which expires on November 30, 2026, is 1810-0756.

ESSA places a major emphasis on teacher quality as a significant factor in improving student achievement. Under the ESEA, Title II, Part A (Supporting Effective Instruction) provides funds to State educational agencies (SEAs) to support effective instruction through the preparation, training, and recruitment of high-quality teachers, principals, and other school leaders. States are provided Title II, Part A State activities funds for this purpose, allowable uses of which include:

- Reforming teacher, principal, or other school leader certification, recertification, licensing, or tenure systems or preparation program standards and approval processes
- Developing, improving, or providing assistance to local education agencies (LEAs) to support the design and implementation of teacher, principal, or other school leader evaluation or support services
- Improving equitable access to effective teachers
- Carrying out programs to establish, expand, or improve alternative routes for State certification of teachers, principals, or other school leaders
- Developing, improving, and implementing mechanisms to assist LEAs and schools in effectively recruiting and retaining teachers, principals, or other school leaders who are effective

The survey asks SEAs how they used their Title II, Part A State activities funds. The survey asks about SEA usage of State activities funds to support college- and career-ready standards, educator evaluation systems, and the equitable distribution of effective teachers. While building on previous data collections, the survey accounts for allowable activities in the statute and requests data on teacher evaluation and retention to help SEAs meet reporting requirements under Section 2104(a).

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/.

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 will collect the information annually from 52 SEAs, which consists of the 50 States, the District of Columbia, and Puerto Rico. The information obtained from the surveys will provide the Department with a description of how Title II, Part A State activities funds are used by each State. In addition, the survey will provide data on teacher, principal, and other school leader evaluation and retention. 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. The SEA survey URL will include embedded login information to reduce the burden of sharing access to the survey within the state if more than one person needs to provide information. Embedding login information eliminates data entry error when accessing the survey.

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.

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 Survey on the Use of Funds Under Title II, Part A 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 LEA 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.**

SEAs are the respondents for this data collection. 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 with the revisions to the program and allowable uses of the funds following the reauthorization of ESEA by 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 SEAs are using their Title II, Part A funds and will not meet the reporting requirements under Section 2104(a). 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.

In August 2026 the Department opened a 60-day public comment period related to this information collection request. This response will be updated to summarize response to comments received before opening a second 30-day public comment period.

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

There will be no payments 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.

While individual information will typically not be disclosed outside of the U.S. Department of Education, there may be circumstances where information may be shared with a third party, such as a Freedom of Information Act request, court orders or subpoena, or if a breach or security incident occurs that affects information collected through this survey, etc. Failure to provide your contact information may limit the ability of the Department to contact you with questions.

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 questions of a sensitive nature.

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.**

[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)

- **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.

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.

Annually, 52 SEAs (50 states, the District of Columbia, and Puerto Rico) will submit data via an online survey. The study team estimates that the SEA survey will take an average of 8 hours to complete including any time responding to questions and correcting any errors. The total burden for the FY2021 data collection is 416 hours (see Table A-1 below). The annualized burden over three years is presented in Table A-2.

Estimated Annual Burden and Respondent Costs Table A-1

Information Activity or IC (with type of respondent)	Sample Size (if applicable)	Respondent Response Rate (if applicable)	Number of Respondents	Number of Responses	Average Burden Hours per Response	Total Annual Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
SEA survey	NA	100%	52	52	8	416	$51.29	$21,336.64
Annualized Totals			52	52	8	416	$51.29	$21,336.64

NOTE: Assumes an hourly rate of $51.29 per hour for educational administrators (derived from the Bureau of Labor Statistics' Occupational Employment and Wages for educational administrators, May 2022). See: https://www.bls.gov/oes/current/oes119032.htm).

Table A-2. Estimates of annual respondent burden over a three-year period

Informant/data collection activity	Number of respondents	Total burden hours	Total costs
SEA survey	156	1,248	$64,009.92

NOTE: Assumes an hourly rate of $51.29 per hour for educational administrators (derived from the Bureau of Labor Statistics' Occupational Employment and Wages for educational administrators, May 2021). See: https://www.bls.gov/oes/current/oes119032.htm

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.**

There are no annualized capital/startup or ongoing operation and maintenance costs associated with collecting the information that are in addition to costs identified in 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 estimated cost to the to collect and analyze the data is $169,210 for school year 2026-27. The total costs for subsequent years are estimated to be $173,170 (2027-28) and $177,222 (2028–29). These estimates are based on previous experience with similar 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.

The Department estimates that it will take 8 hours to complete the survey. As a result, the total annual hours are 416 hours. This estimate in unchanged from the previous clearance requests.

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Total Burden	**0**	**0**	**0**
Total Responses	**0**	**0**	**0**
Total Costs (if applicable)	**0**	**0**	**0**

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.

The results from the survey may be published in an issue brief similar to prior results currently available on the Department's website . No complex analytical techniques will be used. In addition, the data obtained through this data collection will be incorporated into congressional briefings, as well as the Department's GPRA indicators and presentations to state Title II, Part A coordinators.

The Department anticipates using the same schedule as for previous cycles of this information collection. SEAs will be asked to complete the survey in June of 2027 regarding the 2026–27 school year.

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 Department is not requesting a waiver for the display of the OMB approval number and expiration date. The survey and notification letters will display the expiration data for OMB approval.

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

This submission does not require an exception to the Certificate for *Paperwork Reduction Act* (5 CFR 1320.9).