Supporting Statement for Paperwork Reduction Act Submission
Title II Teacher Preparation Program Quality Accountability Reporting Forms
Authorized by the *Higher Education Act* of 1965, as amended in 2008 by the Higher Education Opportunity Act (HEA)

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section[1]. 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, make note of the sections or changed sections, if applicable.

This statement supports the reporting required under Title II of the HEA and proposed regulations under 34 CFR 612, the State Report Card (SRC) and Institution Report Cards (IRC). The attached forms represent the electronic submission format respondents use to enter required information supporting Title II collection. Title II of the Higher Education Act of 1965, as amended (HEA), established the Title II Teacher Quality Accountability data collection and report to the U.S. Congress to provide more meaningful data on teacher preparation program quality. See http://title2.ed.gov/Public/TA/HEA_2008_Sections%20205_208.pdf. Although the statutory reporting requirements for States and institutions of higher education (IHEs) in section 205(a) and (b) are extensive, a chief purpose of this reporting is to improve the overall quality of teacher preparation programs and the programs' ability to produce teachers who are well-prepared to teach when they enter the classroom. The data that have been collected and reported to date have not led to significant improvements in teacher preparation program performance in part because as currently collected, the data do not measure meaningful indicators of program effectiveness.

The Department has proposed new regulatory requirements in 34 CFR 612 under Title II of the HEA, and is revising the associated information collection, to measure such indicators. The new regulatory requirements reflected in this information collection would lead to an improvement in publicly available information on the effectiveness of teacher preparation programs and would be aid prospective students in selecting programs, employers making employment determinations to teacher preparation program graduates, States in making funding decisions, and teacher preparation programs determining areas needed for improvement. Sections 612.3, 612.4, 612.5, and 612.7 contain information collection requirements relevant to the revision of this information collection. Section 612.3 would require IHEs that provide a teacher preparation program leading to State certification or licensure to report data on teacher preparation program performance to States. Section 612.4 would require States that receive funds under the HEA to report to the Secretary on the quality of teacher preparation in the State, both for traditional teacher preparation programs and for alternative route teacher preparation programs leading to State certification or licensure. Section 612.5 would require States to use certain indicators of teacher

[1] Please limit pasted text to no longer than 3 paragraphs.

preparation performance for purposes of the State report card. Section 612.7 would require any IHE administering a teacher preparation program that has lost State approval or financial support based on being identified as a low-performing teacher preparation program to notify the Secretary and students receiving Title IV, HEA funds, and to disclose this information on its Web site.

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 the past, the Department required a grant program to use Title II reporting data to set criteria for grantees to select partners, such as K-12 school districts and schools. For example, Transition to Teaching, a discretionary grant program in the Office of Innovation and Improvement (OII), required applicants to report Title II data showing that teachers at a proposed partner school held State credentials. More recently, the Department has reviewed the available data to determine how to better differentiate program quality as a part of the proposed regulations. The information is being revised in connection with the proposed regulations to help provide meaningful information on program quality to prospective teacher candidates, parents, school districts, States, and IHEs that administer traditional teacher preparation programs and alternative route teacher preparation programs leading to State certification or licensure. The proposed regulations and this information collection would make data available that will better inform academic program selection, program improvement, and accountability.

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. Also describe any consideration of using information technology to reduce burden.

All States submit electronic data to the Department using the Title II's web-based reporting system. To minimize the burden on respondents, the Office of Postsecondary Education prepopulates Title II Report Cards wherever possible, and provides efficient item entry formats and edit checks. Report Cards, as e-report forms, expedite electronic reporting by using radio buttons to save, exit, and reset in various conditions, text boxes, check boxes, drop down lists, and provide options for assistance with numerous data points reported in lists, real-time edit checks and spell-check. States are required by the HEA to report teacher preparation program participants' pass rates on the SRC, which most states expedite by using testing companies to calculate pass rates, and a few States themselves calculate the teacher test pass rates and upload them into the system.

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

The information collected does not duplicate any other information collection effort in the Department. There is no similar information available that can be used or modified for this collection's purpose at this time.

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.

No small businesses are affected by this information collection.

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.

Title II of HEA mandates this annual data collection. The Secretary as well as the States, institutions and programs required to report would be out of compliance with the statute if the information were not collected annually and reported in a timely manner. Reporting required under the proposed regulations will lead to program improvement and more informed choices by prospective students and school districts. The absence of this reporting has led to an absence of meaningful program improvement and does not give the public indicators of program quality upon which to make informed decisions.

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 which 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 that would require this information collection to be conducted in any of the ways listed as part of this question.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

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.

The regulations were developed through the Negotiated Rulemaking process where the public provided its input and in consultation with schools, and a variety of professional associations and other interested parties. There were also preliminary public roundtable discussions where the Department consulted with representatives from the teacher preparation community, States, teacher preparation program students, teachers, and other stakeholders about the best way to produce more meaningful data on the quality of teacher preparation programs while also reducing the reporting burden on States and teacher preparation programs where possible.

The comment period for the burden associated with these proposed regulations will run concurrently with the comment period for the proposed regulations.

9. Explain any decision to provide any payment or gift to respondents other than remuneration of contractors or grantees.

No payment or gift will be provided to respondents in connection with this data collection.

10. Describe any assurance of confidentiality provided to respondents.

The information being requested through these Report Cards is required, not voluntary. Much of the required information is public information, since teacher credential requirements are a matter of public record in all States and jurisdictions. The production and verification of pass rates, which involve personally identifiable data, will be handled in accordance with all applicable

State and federal laws, including privacy laws. In accordance with HEA, pass rates on tests taken by fewer than 10 examinees will not be reported. Individually identifiable data will also be handled in accordance with all relevant laws, including privacy laws.

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.

Privacy protected information is not collected in either State or Institutional Report Cards and none of the data points are of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **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, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in item 12. 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 the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**

- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent types, IC activity, Respondent and Responses, Hours/Response, and Total Hours)**

- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. 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.**

While the burden hours associated with this information collection are summarized in the table below, the underlying calculations and justifications are discussed in full detail in the Paperwork Reduction Act section of the Department’s Notice of Proposed Rulemaking (NPRM) and not reproduced here to eliminate redundancy and eliminate unnecessary review of duplicative information.

The proposed regulations execute a statutory requirement that IHEs and States establish an information and accountability system through which the nation's 1,522 IHEs providing teacher education programs and all States report on the performance of their teacher preparation programs. Nearly 98 percent of IHEs providing teacher preparation programs are four-year institutions. More than 60 percent of these IHEs are private-not-for-profit, more than 37 percent are public institutions and 1.5 percent are private for-profit as reported in *The Secretary's Ninth Report to Congress on Teacher Quality* http://www2.ed.gov/about/reports/annual/teachprep/index.html.

During public roundtable discussions and subsequent negotiated rulemaking sessions, the Department received feedback from representatives from the teacher preparation community, States, teacher preparation program students, teachers, and other stakeholders about the best way to produce more meaningful data on the quality of teacher preparation programs while also reducing the reporting burden on States and teacher preparation programs where possible. Partially based on information provided from the teacher preparation program constituency, revisions to HEA Title II data collection were developed and are reflected in this information collection.

The reporting associated with this collection is divided into burden to IHEs under the IRC and States under the SRC. The burden is further subdivided into what the NPRM refers to as (1) "start-up" burden: systems that will require initial costs and time to establish but will no longer represent a burden after establishment; and (2) "annual" burden that will be effective in roughly the same amount each year. Because parts of the proposed regulation would require IHEs and States to establish or scale up certain systems and processes in order to collect information necessary for annual reporting, IHEs and States may incur one-time start-up costs for developing those systems and processes.

For example, under the current IRC, IHEs typically report at the entity level, rather than the program level, such that an IHE that administers multiple teacher preparation programs gathers data on each of those programs, aggregates the data, and reports the required information as a single teacher preparation entity on a single report card. By contrast, the proposed regulations generally would require that States report on program performance at the individual program level. The Department believes that this proposed regulatory requirement would not require any additional data collection or appreciably alter the time needed to calculate data to report because IHEs already have to submit an IRC with aggregated data. The change is in the sequence of collection although the Department believes some additional reporting burden would exist for IHEs' electronic input and submission of disaggregated data because each IHE typically houses multiple teacher preparation programs. It should also be noted that the change in burden hours for the IRC described in the table below (83,482 hours) is the total reduction in hours to respondents that we estimate will complete the form. This in combination with an adjustment to the estimated number of respondents (a reduction from 1,721 to 1,522) accounts for an additional estimated burden adjustment of approximately 21,444 hours, for a total reduction of 104,926.

This provides the baseline divergence in reporting burden described in the PRA section of the NPRM.

Section 103(20) of the HEA and §612.2(d) of the proposed regulations define "State" to include nine locations in addition to the 50 States: the Commonwealth of Puerto Rico, the District of Columbia, Guam, American Samoa, the United States Virgin Islands, the Commonwealth of the Northern Mariana Islands, the Freely Associated States, which include the Republic of the Marshall Islands, the Federated States of Micronesia, and Republic of Palau. For this reason, all reporting required of States explicitly enumerated under §205(b) of the HEA (and the related portions of the regulations, specifically §§612.4(a) and 612.6(b)), apply to these 59 States. However, certain additional regulatory requirements (specifically §§612.4(b), 612.4(c), 612.5, and 612.6(a)) only apply to the 50 States of the Union, the Commonwealth of Puerto Rico, and the District of Columbia. The burden estimates under those portions of this report apply to those 52 States.

Table 1: Revised Estimates for HEA Title II IRC and SRC Burden Hours

Report Card	Regulatory Section	Information Collection	Proposed Burden Hours	Change in Burden Hours
IRC	§612.3	This proposed regulatory section would require IHEs that provide a teacher preparation program leading to State certification or licensure to provide data on teacher preparation program performance to the States.	146,340 hours	Reduction of 83,482 hours
SRC	§612.4	This proposed regulatory section would require States that receive funds under the Higher Education Act of 1965, as amended, to report to the Secretary on the quality of teacher preparation in the State, both for traditional teacher preparation programs and for alternative route to State certification and licensure programs.	Between 38,350 and 38,466 hours	Reduction of 15,283 to 15,400 hours
SRC	§612.5	This proposed regulatory section would require States to use certain indicators of teacher preparation performance for purposes of the State report card.	606,123 hours	Increase of 606,123 hours
SRC	§612.7	The proposed regulations under this section would require any IHE administering a teacher preparation program that has lost State approval or financial support based on being identified as a low-performing teacher preparation program to notify the Secretary and students receiving title IV, HEA funds, and to disclose this information on its Web site.	288 hours	Increase of 288 hours
SRC	Subtotal of SRC Reporting		Between 644,761 and 644,877 hours	Increase of 591,012 to 591,128 hours
IRC and SRC	**Total Reporting Burden Under 34 CFR §612**		**Between 791,101 and 791,217 hours**	**Increase of 507,530 to 507,646 hours**

The monetary costs associated with this information collection are calculated and discussed in more detail in the Regulatory Impact Analysis section of the Department's NPRM and not reproduced here to eliminate redundancy and eliminate unnecessary review of duplicative information. The estimated costs of implementing the specific proposed requirements, including the costs of complying with paperwork-related requirements, are included in Table 2.

Table 2: Revised Estimates for Information Collection and Reporting Cost

Reporting Required	Estimated Costs	
	7%	3%
Institutional Report Card (set-up, annual reporting, posting on website)	$3,557,591	$3,554,635
State Report Card (Statutory requirements: annual reporting, posting on website; Regulatory requirements: meaningful differentiation, consulting with stakeholders, aggregation of small programs, assurance of accreditation, other annual reporting costs)	$1,582,038	$1,569,326
Reporting Student Learning Outcomes (develop model to link aggregate data on student achievement to teacher preparation programs, modifications to student growth models for non-tested grades and subjects, and measuring student growth)	$18,718,081	$18,650,716
Reporting Employment Outcomes (placement and retention data collection directly from IHEs or LEAs)	$2,289,940	$2,289,940
Reporting Survey Results (developing survey instruments, annual administration, and response costs)	$15,965,862	$15,940,841
Total estimated costs	**$42,113,512**	**$42,005,458**

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.)

Apart from the costs reflected in the latter part of item 12 and in item 14, there is no additional cost burden to respondents or record keepers resulting from the 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 costs incurred by the federal government due to the proposed regulations include the cost of employing a contractor to develop and maintain the IT data collection system and support the Title II Web site for perpetual access to the current and longitudinal database. A contractor would develop and manage on-line Report Cards, collect, tabulate and analyze States' data, and prepare publication-ready Secretary's annual report documents on the quality of teacher preparation programs and State requirements for teacher initial credentials based on the Title II data collection findings. Additionally, the contractor provides outreach and technical assistance to all states, approximately 25,000 programs, including non IHE-based teacher preparation programs for two annual national data collections. The contract funding is currently drawn from the appropriations for the HEA Title II discretionary grant program. The annualized cost to the Federal government for a contract to deploy the proposed regulations is estimated to be $1,000,000 per year. Title II of HEA requires a federal program manager and staff, including a contract officers' representative (COR) to meet the requirements of the proposed regulations.

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).

The program revisions presented in this justification result from negotiated rulemaking and proposed regulations. The new regulatory requirements reflected in this information collection would lead to an improvement in publicly available information on the effectiveness of teacher preparation programs and would be aid prospective students in selecting programs, employers making employment determinations to teacher preparation program graduates, States in making funding decisions, and teacher preparation programs determining areas needed for improvement.

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 Secretary of Education submits an annual report to the Congress each year through the Department's Title II program. The Title II program receives information from States on the State Report Card (SRC) and prepares and analyzes the information for presentation to Congress within a year of the SRC reporting deadline of October 31. The State collects information on teacher preparation entities and programs using the Institution and Program Report Card (IPRC) or other form, if the State prefers. There are no complex analytical techniques applied to the data as descriptive statistics are generally used accompanied by explanatory text. All Title II Reports are published on the Department's web page at
http://www2.ed.gov/about/reports/annual/teachprep/index.html
and on the Department's HEA Title II program web site at
https://title2.ed.gov/Public/Home.aspx

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.

OPE will display the expiration date for OMB approval of the information collection on the first page of the annual SRC, the annual IPRC and the User Manuals.

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

There are no exceptions to the statement.