

SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

Charter School Authorizer Annual Update administered by the National Charter School Resource Center

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. Please limit pasted text to no longer than 3 pages. 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.

The U.S. Department of Education (ED) has as one of its important policy goals expanding the number of high-quality public school choice options. Specifically, according to Part B section 5201 of the Elementary and Secondary Education Act, two of the established purposes of the Charter School Program office are: evaluating the effects of charter schools, including the effects on students, student academic achievement, staff and parents, and expanding the number of high-quality charter schools available to students across the nation.

Charter school authorization is at the very crux of any efforts to expand and ensure high-quality public school choice options through public charter schools because charter school authorizers are the public entities primarily responsible for: initial charter authorizations, on-going monitoring and oversight, and charter renewal and closure decisions.

This data collection provides information to a comprehensive national database of roughly 900 charter school authorizers complete with the schools under their authority; some of these data elements are available from public documents, but they are not made available to the public consistently across all authorizers. This is a comprehensive, fully-populated tool for tracking the activities of and evaluating the quality of authorizers nationwide based on their authorizing decisions in light of schools' performance. This instrument will be administered to all charter school authorizers.

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 National Charter School Resource Center (Charter School Center) will be administering the necessary instrument, collecting the resulting information, and maintaining the authorizer database. The Charter School Center is contracted by the US Department of Education's Office of Charter Schools to provide resources and information to the public and charter school stakeholders in pursuit of the Charter School Program's statutory mission. Contractor staff will collect data from all of the nation's charter authorizers. The data will focus on their respective schools and fall within the following general categories: characteristics of schools under their

authority, renewal/closure cycles and decisions, related reasons for renewal or closure, and other information around authorizers' renewal, closure, and interim policies and practices.

These data will be collected annually via on-line instruments (highly preferable) and paper instruments. The on-line instrument link will be provided to respondents via e-mail correspondence and on the mailed paper instrument.

The purpose of this project is for the Charter School Center to maintain and implement a publicly available charter school authorizer database that aligns authorizer data with individual charter school data. This database will enable policymakers, educators, researchers, and the public to know at a glance all historic and upcoming authorizer decisions. It will also enable these audiences to better understand whether individual authorizers are making charter renewal and closure decisions.

Information from this data collection is used to connect charter schools with authorizers, and to provide data for the Department's EDFacts system.

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 given to using technology to reduce burden.

The information collection will be administered with both a paper instrument mailed to respondents and electronic completion and submission via the Charter School Center website at www.charterschoolcenter.org. The paper instrument will include instructions on how to access and complete the electronic version of the instrument. Electronic completion and submission will greatly reduce the recordkeeping and data entry burden, so this method will be encouraged.

However, expert input from a Charter School Center advisory board member indicated that mailing the paper instrument to respondents served several purposes: 1) it serves as a physical reminder that the instrument needs to be completed; 2) it serves as an organization tool on which respondents can gather all of the necessary information before entering it into the online version; 3) for the percentage of respondents that are not able or do not wish to complete the instrument electronically, it provides another way to collect the information.

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 Question 2 above.

There is no comprehensive national database of the roughly 900 charter school authorizers complete with the schools under their authority currently in existence. Also, there is currently no comprehensive, fully-populated tool for evaluating the quality of authorizers nationwide based on their authorizing decisions in light of schools' performance. The National Association of Charter Authorizers (NACSA) will provide the Charter School Center with the list of approximately 900 authorizers and the charter schools that they authorize, which avoids duplication of effort around basic data collection for those authorizers and their schools. Support staff will follow up with non-respondents six weeks after instrument administration by phone or email and encourage potential respondents to complete the instrument electronically or, in some cases, by phone.

The instrument was tested on six potential respondents in early October 2010. These respondents provided feedback on ease of completion and question comprehension, and feedback was incorporated into the final instrument.

Currently, some authorizer data is being incorporated in the ED Facts data collection, collecting the authorizer name and type for each charter school. This addition will first be collected with the SY 2013-2014 data set, and will ensure the Department receives this data on all charter schools in the country. However, these additions do not include the more detailed information provided by the data collection, particularly renewal information and closure reasons.

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.

Many charter school authorizers are local school districts, and so range in size from small to very large. Authorizers are also State Educational Agencies, universities, and other non-profits and governmental organizations. As a rule, smaller entities generally authorize fewer schools, making the amount of information collected proportionate to the authorizer's size. Moreover, the information collection represents a very minimal burden to each authorizer (0.5 to 4.0 hours annually depending on the number of schools authorized). The requested information is intrinsic to an authorizer's operations and should be readily available to these entities.

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.

As stated above, The U.S. Department of Education has as one of its important policy goals expanding the number high-quality public school choice options. Specifically, the Charter School Program office within the Office of Innovation and Improvement is at the forefront of efforts to achieve this goal. Charter school authorization is inherently a critical component of successfully doing so because these are the state and local bodies that have the authority to grant, monitor, oversee, renew and close public charter schools. Thus, a means for stakeholders to be able to access objective information about authorizers based on their decision-making in light of the performance of schools under their charge is essential to achieving the high-quality public school choice goals of the U.S. Department of Education. If this information is not collected, it would be extremely difficult, if not impossible, for stakeholders to access and utilize this information on a national scale.

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 instrument, 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 that require the information collection to be conducted in any of the manners described above.

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

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-and 30-day Federal Register Notice.

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

No gifts or payments will be made 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 ICRAS' Part 2 IC form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be

provided. 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 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.

No assurance of confidentiality is provided as the information is public.

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.

No questions in this information collection 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 Question 12. Unless directed to do so, agencies should not conduct special instruments 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. (The table should at minimum include Respondent types, Number of Respondents 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 Question 14.**

This information request covers one form.

Number of respondents: 900

Frequency of response: once annually

Annual burden hours: 2,025

Taking 2.25 hours on average to complete, depending on number of charter schools authorized (more schools will increase the burden) and ease of authorizer record retrieval. (Expected range of burden is 0.5 to 4 hours per authorizer.)

Annual cost to respondents: \$35 per hour; \$78.75 per respondent, on average; \$70,875 across all respondents annually. This amount is expected to be reduced by 50% after the first year, as the incremental information needed will be considerably less.

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 Questions 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 Question 12.**

Total Annualized Capital/Startup Cost:

Total Annual Costs (O&M):

Total Annualized Costs Requested:

There is no capital, start-up, or maintenance cost to respondents.

Start-up costs are not necessary for renewal.

The approximate cost of on-going annual maintenance and data collection is \$65,000 per year. This cost is comprised of: 1,166 staff hours at \$62,000, Supplies (for administering paper instrument) at \$3,000. Total \$65,000. Therefore the total cost of information collection over three years is:

First year \$65,000

Second year \$65,000

Third year \$65,000

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 Questions 12, 13, and 14 in a single table.

Cost to the Federal government, excluding Item 13, is \$0

Aggregate cost estimate from Items 12, 13, and 14

12. Cost to respondents, year 1: \$70,875

13. Total annual cost burden, year 1: \$65,000

14. Cost to the Federal government: \$0

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).

There are no requested program changes or adjustments; this is an extension request without change.

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.

The information will be published via a searchable database available at www.charterschoolcenter.org, or at a similar site to be developed. No complex analytical techniques or statistical methods will be used.

17. 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.

Year 1 Schedule

Task	Completion date
Instrument renewal	December 2013
Instrument administration	Summer 2014
Data collection and entry	August-September 2014
Database updated	September 2014

18. 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 will be displayed on the information collection.

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

There is no exception to the certifications.