

U.S. Department of Education  
400 Maryland Avenue SW  
Washington, DC 20202  
Attn: Acting Director of the Information Collection Clearance Division

February 5, 2018

**Re: Survey on the Use of Funds Under Title II, Part A: Improving Teacher Quality State Grants—State-Level Activity Funds**

The undersigned organizations are writing in response to the U.S. Department of Education’s (the Department’s) request for comments for the Survey on the Use of Funds Under Title II, Part A (Title II-A): Improving Teacher Quality State Grants—State-Level Activity Funds. Collectively, our organizations represent the nation’s Pre-K–12 elementary, middle-level, and high school principals, other school leaders and educators, and we are pleased to submit the following comments in support of continuing the collection of Title II-A survey data.

**(1) Our organizations believe that the data collection for the Survey on the Title II-A use of funds is a necessary and proper function of the Department and should be continued.**

Specifically, we believe the collection and reporting are not only necessary to the proper functions of the Department, but are required by law under section 2104 of Elementary and Secondary Education Act (ESEA) (20 U.S.C. 6301), which requires that state educational agencies compile an annual report (covering, among other things, the uses of Title II-A funds in the state and how the state’s Title II-A activities are improving teacher, principal, and other school leader effectiveness), submit that report to the Secretary, and make it publicly available. The information in the Title II-A surveys has long served as the only readily available data analysis for Congress, state governments, constituents, researchers and other key stakeholders about the uses of Title II-A investments. In fact, the school year 2012-2013 survey<sup>1</sup> was integral to demonstrating that school principals were not receiving adequate professional development opportunities, as the results indicated only 4% of Title II-A funds were being used for dedicated support for school administrators.<sup>2</sup> We provided this data point (along with other relevant facts and statistics) to the Congressional authors of the Every Student Succeeds Act (ESSA) during the reauthorization of ESEA, and they responded by including language that allows states to reserve up to 3% of their funds specifically for school leadership activities, including strengthening principal preparation programs, offering mentoring and induction support to new school

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<sup>1</sup> [Findings from the 2013-2014 Survey](#) on the Use of Funds Under *Title II*, Part A - State Activities Funds (August 2014)

<sup>2</sup> [NASSP’s comments](#) on the Department of Education (ED) Notice: [Agency Information Collection Activities; Comment Request; Survey on the Use of Funds Under Title II, Part A \(“Improving Teacher Quality State Grants Subgrants to LEAS”\)](#)

leaders, and ongoing job-embedded professional development. Thus, in this instance, the data proved critical to Congress in enacting a law that helped identify and address an important issue. With the passage of ESSA into law, the data collection has become even more important as schools, districts, and states have included innovative new uses of the funding – in alignment with the new law – and the data collection is needed to measure the impact of the new legislation.

Given the new changes made to the Title II-A program under current law, the data collected in future reports will be essential to establishing whether and how states are in fact using their Title II-A funds to support principals and other school leaders. These reports will provide foundational data for determining whether state-supported professional development is improving the effectiveness of principals and other school leaders and having a positive impact on student success. These reports will also help in monitoring the new definition of professional learning to ensure that the ongoing, job-embedded, collaborative professional learning now being offered in schools and districts is effecting positive changes both in teacher practice and student performance. Therefore, we strongly urge the Department to continue the ongoing collection of Title II-A data in order to ensure that states and local school districts are implementing programs consistent with the new provisions under the law and to help stakeholders gain knowledge on the uses of these investments in improving school leadership.

**(2) In order to enhance the quality of information being collected, our organizations strongly urge the Department to expand the proposed data collection to include more specific information regarding the use of Title II-A state-level set-aside in strengthening school leadership.**

Currently, the Department collects no data regarding how states and school districts spend Title II-A funds to support principals and other school leaders, beyond asking the amount of funding expended and a brief explanation of the activities carried out. This lack of data makes it extremely difficult to gain an understanding of the professional development that principals and school leaders receive. Further, this data vacuum does not help improve the principal or school leader profession, and it undermines the interest in states, school districts and even the federal government in supporting investments in this area.

With Title II-A authorized in ESSA at \$2.35 billion and receiving \$2.053 billion in the last annual appropriations bill, it is vital that Congress, the Administration, and every school district in the nation have access to timely and relevant data about how Title II-A dollars are used.

Accordingly, we strongly urge the Department to include within each annual survey specific questions about principals and school leaders in order for stakeholders and Congress to accurately understand the uses and impact of these funds. We believe that the lack of adequate data collection on Title II-A contributed to the Department's recommendation to eliminate Title II-A in its budget without an accurate analysis of the true impact of how these funds help support teachers and school leaders.

In support of the proposal for higher quality data in this area, we recommend that the Department include questions in future surveys that yield relevant and timely data on the following:

- In what manner, if at all, are states using their set-asides to build capacity of the state education agency staff to help build the capacity of principals and assistant principals in school districts?
- If states are using their set-aside funding to assist school districts in strengthening school leadership, each state should address the following:
  - How are states distributing the funding?
  - What are the state priorities for assisting school districts?
  - How are the states determining those priorities? For example, are they setting their priorities based on needs assessments or the goals and objectives set for their ESSA plans?
  - How are they determining the impact of their activities?
- Regardless of whether the funds are used at the state agency or school district level, how and what are states collecting as evidence of the effectiveness for the use of funds?
- How are states using their set-asides to fulfill their equity pledges and goals and to close achievement gaps?

Our organizations appreciate the Department's consideration of the above comments and recommendations for improving the Survey on the Use of Funds Under Title II, Part A, and we look forward to working with the Department to support the additional data collection.

American Federation of School Administrators  
ASCD  
Learning Forward  
National Association of Elementary School Principals  
National Association of Secondary School Principals  
New Leaders