



www.nsba.org
Phone: 703.838.NSBA Fax: 703.683.7590
1680 Duke Street Alexandria, Virginia 22314 -3493

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Via electronic mail (www.regulations.gov)

Kate Mullan, Acting Director
Information Collection Clearance Division
Privacy, Information and Records Management Services
Office of Management
U.S. Department of Education
400 Maryland Avenue, S.W., LBJ
Mailstop L-OM-2-2E319, Room 2E103
Washington, D.C. 20202

Re: ED Notice of Information Collection; Docket ID: ED-2013-ICCD-0157
Title of Collection: The Impact of Professional Development in Fractions for Fourth Grade
OMB Control Number: 1850-NEW

Dear Ms. Mullan:

The National School Boards Association (NSBA), representing through our state associations approximately 13,800 school districts nationwide, offers the following comments to the Notice, *Agency Information Collection Activities; Comment Request; The Impact of Professional Development in Fractions for Fourth Grade*, ED-2013-ICCD-0157 ("Notice"),¹ issued by the U.S. Department of Education (ED) on March 6, 2014. NSBA understands that through this Notice, ED is seeking approval from the Office of Management and Budget (OMB) to permit ED, through the Institute of Education Sciences and National Center for Education Statistics, to collect information about the outcomes and results on student achievement of fourth grade teachers who receive professional development (PD) in the instruction of fractions.

NSBA supports providing opportunities for teachers to receive PD to become better educators for their students. However, NSBA is concerned that this Notice goes much farther than merely requesting permission to collect data. To obtain the data sought, ED will need fourth grade teachers to participate in a PD program that would be squeezed into eight sessions during the already-short first semester of the coming 2014-2015 school year (SY). More specifically, ED states that, at the front end, it will seek to have approximately 252 teachers from certain Georgia and South Carolina elementary schools go through this PD training consisting of 8 three-hour sessions, plus additional time for

¹ Notice, 79 Fed. Reg. 12,690 (Mar. 6, 2014).

homework, all during just the fall semester, and have those teachers fill out nine monthly PD surveys and take a pre- and post-test on fractions. Then, at the back end, administer a fractions assessment to the students of those teachers during the spring semester of the 2014-2015 SY to determine if there is any improvement in their use of fractions.

To be clear, NSBA believes there is value in making PD opportunities available to teachers to help them grow in their instructional methods, but this “data collection” is more than just a “data collection.” To get the data ED seeks, approximately 252 teachers must commit time and energy, possibly taking them away from their classrooms and students, to be participants in a “randomized control trial study.” NSBA wants to bring to OMB’s and ED’s attention some monetary and non-monetary impacts that this “data collection” will have on school districts and teachers as OMB contemplates whether to permit ED to conduct such a study.

Monetary Concerns

When will the 8 three-hour sessions of PD be conducted during the Fall 2014 semester?

After School Hours? If the PD is to take place after school hours, it is unclear from the Notice who is going to pay for the teachers’ time. Technically, teachers are “off contract” once the school day ends, and **are not required** to engage in any duties **without being paid overtime** above and beyond their contracted salaries. As part of its “randomized control trial study,” is ED going to compensate these teachers for their 24 hours of PD class time **plus** the time they spend on the “additional homework lessons”?

Right now, school districts are wrapping up their work on the budget process for the 2014-2015 SY. It is unlikely that such additional compensation has been included in the budget drafts for the yet-to-named affected school districts in Georgia and South Carolina. And given the tight time constraints teachers already face in balancing their work and home lives during the school year, it is unlikely that the desired number of teachers would **voluntarily** participate in the PD program requiring that much of a time commitment without compensation.

During School Hours? If the teachers would be expected to attend the PD during the school day, it is unclear from the Notice itself who is going to pay for the costs of the substitute teachers needed to cover the classrooms of those 252 teachers. Supplemental documents state that the ED trial study is not going to pay for the time of substitute teachers. This is a big expense that will have a direct financial impact on school districts, though ED states in its materials that it will not. Such teacher absences will result in considerable expense for the affected school districts since 24 clock hours of PD x 252 teachers = 6,048 hours of substitute teacher coverage that will be required to permit the teachers’ attendance. Typically, substitute teachers are not paid by the hour, but by the half- or full-day of coverage. Again, this is a cost that the affected school districts probably have not factored into their 2014-2015 SY budgets already in the approval process now.

Where is the PD to take place?

If the PD is to take place at a central location, since the 84 schools will be spread out across two states, will ED be reimbursing the teachers for their mileage, food, and housing costs (if any) that they incur to travel to the training site? Or is the PD to take place at each teacher's school? The Notice does not provide the logistical details of how this entire project is to be completed.

Non-Monetary Concerns

Interruption of Student Learning

Typically, elementary school teachers do not teach just one subject during the day. Each teacher teaches most, if not all, areas of the district's fourth grade curriculum during the course of the day/week. Thus, if the PD takes place during the school day necessitating the teacher's absence, those teachers' students will be taught by a substitute teacher for three clock hours a week on eight separate occasions over the course of the short 18-week Fall 2014 semester. Also, it is highly probable that it will be a different substitute teacher for each period of absence. Though substitute teachers are a valued part of the education system, not all districts require substitute teachers to have a teaching certificate or even any post-secondary education. Some only require a high school diploma. Thus, some of the instruction being provided in solid three-hour blocks to those affected fourth graders during the regular teacher's absences may be by a person who is not licensed and/or has no instruction or experience in how to teach students in any subject area whatsoever.

Since the PD is to take place during just the Fall 2014 semester, the students of the 252 identified teachers will be receiving 24 clock hours of instruction from less than fully qualified persons. Assuming an average class size of 20 students, a little over 5,000 students' educational growth would be negatively impacted during the fall semester of their fourth grade year, and not just in math instruction, but in instruction in a multitude of content areas depending on the curricula of the affected school districts.

Validity of Data Collected from Assessment of Students

From the Notice, it appears that the students of the teachers going through the PD will be tested during the Spring 2015 semester to ascertain any student achievement in working with fractions. However, it is unknown to what data the assessment results will be compared to determine whether there has been student achievement. It would be unreasonable to compare the fourth graders' outcomes in Spring 2015 to testing results of fourth grade classes from previous years, because they are different students. Also, given that the teachers would have just received the PD on fractions in the previous semester, it is questionable how much improvement the students of those teachers would demonstrate in working with fractions at the end of the very next semester.

Working with fractions is a skill that is expanded upon over several years as students progress through a school district's mathematics curriculum. It is unclear what one assessment at the end of the

fourth grade year will show to justify the disruption in the educational growth of those students in the other areas of the curriculum.

NSBA reiterates its support for teachers continually receiving professional development. However, the method by which ED seeks to obtain the identified data, and the data's usefulness, is questionable and raises significant cost and validity issues. NSBA offers this information to assist OMB and ED in their decisionmaking as to whether this "randomized control trial study" is the most effective means to its end of assessing the impact of professional development in fractions for fourth grade. If you have any questions, please do not hesitate to contact me for further discussion.

Respectfully submitted,

/s/

Francisco M. Negrón, Jr.
General Counsel
National School Boards Association