
**U. S. DEPARTMENT OF EDUCATION
INSTITUTE OF EDUCATION SCIENCES
NATIONAL CENTER FOR EDUCATION EVALUATION AND REGIONAL ASSISTANCE**

TO: Rachel Potter, Brian Harris-Kojetin
FROM: Paul Strasberg and Marsha Silverberg
CC: Kathy Axt
SUBJECT: Request for Emergency Review: Forms Clearance Package for the Impact Evaluation of Mandatory Random Student Drug Testing (OMB # 1850-0808)
DATE: 12/15/2006

We are writing to request emergency review for a clearance package that was initially submitted to OMB in mid 2005 but withdrawn in September 2005. This memo summarizes the reasons for the request, the status of the package, and updates you on our current expected schedule. We ask for a response as soon as possible.

I. Background/Rationale for Request

As you know, largely at OMB's urging, in 2005 ED began a randomized controlled trial of grantees who applied for OSDFS funds under a competitive priority to implement mandatory-random student drug testing and who agreed to participate in the evaluation. That evaluation was cancelled in September 2005 because an insufficient number of grantees applied under the competitive priority. The evaluation's forms clearance package, about to be reviewed by OMB, was therefore withdrawn at that time.

With OMB's support, a second, slightly revised, round of grant and evaluation competitions were completed in FY 2006. Grants were awarded by OSDFS to 11 districts and 52 schools. The evaluation design requires a very quick start, because the baseline student surveys must be completed in February 2007¹, and a variety of activities must be undertaken in late January / early February to sample students for the surveys, obtain parental consent, and schedule the survey administrations in grantee schools.

However, ED has been reluctant to submit a new forms clearance package until now for the following reasons:

¹ In order to get grantee buy in we agreed to conduct random assignment as soon as possible after grant notices go out so that grantees can begin implementation quickly. The grant solicitation states that the baseline survey will be conducted in February 2007 and districts/schools will be notified about random assignment status in March.

1. We wanted to avoid adding to OMB’s workload by submitting a forms clearance package only after we were confident that there would be sufficient number of schools to conduct the study. In order to conduct the study, grantees need: i) to implement a drug testing program (which involves school board approval) and ii) be able and willing to cooperate with all evaluation requirements. To date, at least 7 grantees representing 36 schools² have received school board approval and all have been cooperating with the evaluation effort. Therefore, we believe that submission of the forms clearance package is warranted at this time.

2. We needed our evaluation contractor, on board since September 20, to review the survey instruments in the already-submitted clearance package to ensure consistency with their evaluation design; some very modest changes were warranted. Further, a Technical Work Group (TWG) meeting was held in late November which gave the study team a critical opportunity to gather expert input on the study design and related instrumentation. We believe that the study design has been strengthened markedly due to the TWG’s input, though it resulted in a modest delay in submission.

If we begin the regular clearance process now, we would be unable to obtain approval in time to conduct the necessary steps to administer the baseline student surveys as planned in February 2007.

We therefore request approval soon after the comment period on Jan. 22, 2007.

II. Status of Current Submission

The current (withdrawn) package has already gone through much of the review process.

- 60-day notice was posted approximately May 11, 2005
- 30-day notice was posted August 4, 2005
- First contact with OMB (Rachel) on September 8, 2005
- Formal notice of withdrawal on September 27, 2005

III. Expected Timeline

September 20	Evaluation contract awarded
September 30	OSDFS awarded grants to 11 districts and 52 participating high schools
December 21	30-day notice posted
December 21 – January 21	OMB review; approval on January 22

² Our power calculations for this study indicated a minimum of 30 schools to adequately power this study.

Upon OMB Approval – February 16	Obtain data from schools to conduct sampling for baseline student survey
February 17 – February 28	Conduct baseline student survey
March	National evaluation contractor announces random assignment to treatment and control condition
April - June	Treatment schools announce plans to implement their random student drug testing policies in late Spring or at beginning of 2007-08 school year

Thank you for your consideration of our request.