

**Supporting Statement  
Paperwork Reduction Act Submission  
Student Drug Testing Information Collection**

**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 copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

Since 2003, the Department of Education (ED), working in close collaboration with the Office of National Drug Control Policy (ONDCP), has awarded 74 grants to eligible entities under the Grants to School-Based Student Drug-Testing Programs to support implementation of student drug testing in the Nation's schools. ED expects to make 11 new awards in 2007. This program has been identified as a priority by the Administration and the President's budget request calls for significant increases in its funding. In light of this anticipated growth, ONDCP has expressed a desire for more in-depth information about the performance of these grants than that provided in the annual reports submitted by grantees through the ED form 524B. ONDCP is requesting this information in order to assist that office in assessing the programs and providing relevant members of Congress with data on program implementation. Information from the national evaluation of student drug-testing grantees will not be available until 2009. This questionnaire will provide interim information that ED and ONDCP can use to assess progress by grantees.

**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 from the current collection.**

This is a new collection. Its purpose is to gather uniform data across all drug testing grantee sites in order to monitor implementation progress and to provide the Administration and relevant members of Congress with data on the program's accomplishments. Information solicited will include the number of students tested in each school year by school and by grade; the number of positive drug tests by school year; the total population of each grade participating in the student drug-testing program in each school, and the type of drug panel used for each grade in each school. This information will help ED and ONDCP respond to public inquires about the state of student drug testing in schools and to further refine and improve future grant competitions. Also, the information will be used by ED grant monitors to provide additional technical assistance to grantees, if required.

**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.**

The information collection is designed to minimize respondent burden and uses a report format that is best suited to the type of information to be gathered. The questionnaires will be posted to the ED Web site and respondents will have the option to submit reports via hard copy or via email to a designated ED mailbox. Approximately 30 days after the requested due date, ED staff will also follow up by email with grantees who have not responded in order to answer questions and provide technical assistance in completing the questionnaire, if necessary.

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

Respondents to this questionnaire are entities awarded grants under ED's Demonstration Grants for School-Based Student Drug Testing (2003) and Grants for School-Based Student Drug-Testing Programs (subsequent years). Grantees currently report annually to ED on their implementation progress using ED's generic Form 524B (OMB #1890-0004). This form does not duplicate information required by the new collection and does not permit grantees to respond in the required detail. This collection does not duplicate current questionnaires or other information collections supported by ED or other Federal agencies.

**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

The respondents for the information collection are grantees. There is no impact on small businesses or other small 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.**

Without this information collection ONDCP believes that it will not have a comprehensive and uniform set of data about how ED grantees are implementing their programs, including the timing of tests, the number of tests being administered by grade level, and drug-testing results by grade, and will be unable to respond to potential congressional and other public enquiries about student drug testing.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

**a) requiring respondents to report information to the agency more than quarterly;**  
Respondents will report annually.

**b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

Responses are voluntary and grantees will have a minimum of 30 days to respond.

**c) requiring respondents to submit more than an original and two copies of any document;**

Grantees will be requested to submit only one copy of the completed questionnaire.

**d) requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

Grantees will respond based on information they currently collect and they will not be required to retain records for this collection.

**e) in connection with a statistical questionnaires, this is not designed to produce valid and reliable results than can be generalized to the universe of study;**

This collection is designed to provide information about implementation progress by student drug-testing grantees and is not generalizable.

**f) requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

This collection does not require the use of any statistical data classification system.

**g) 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;**

The collection does not include a pledge of confidentiality.

**h) requiring respondents to submit propriety 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.**

Respondents will not be required to submit propriety trade secrets or other confidential information.

**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 5CFR 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 the comments. Specifically address comments received on cost and hour burden.**

We will publish 60-day and 30-day Federal Register notices to allow public comment.

- **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.**

ED has worked closely with ONDCP on the design and development of the questionnaire.

- **Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three 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.**

This is a new collection. No outside consultation with representatives of those from whom information is to be obtained has been sought.

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

Gifts or payments will not be provided to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.** No assurance of confidentiality will be provided to respondents. All data reported as part of this collection will come from grantee records of student drug testing program implementation. No personally identifiable information will be part of this collection.

**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 from 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.**

The only potentially sensitive question in the questionnaires is the number of positive drug tests. Respondents will report only a number without any personally identifiable information that might be linked to a specific student.

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

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, the agencies should not conduct special questionnaires 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 burden hours for customary and usual business practices.**

The number of respondents in fiscal year (FY) 2007 is expected to be 83. The number in subsequent years is dependent on appropriations sufficient to permit ED to offer new grant awards. The same questionnaire will be given to the same respondents each year.

Frequency of response for this collection is annual.

The annual burden is estimated at 1,660 hours: 83 respondents@20 hours per response per year. This includes time to review records, record information, and submit either electronically or by paper. Burden may be less in subsequent years as the questionnaire is made a part of each grantee's normal record keeping procedures.

Anticipated number of hours required by size of testing pool is:

500 or fewer students in the testing pool equals approximately 10 hours for 14 grantees to compile the information; 500 to 2,000 students in the testing equals approximately 20 hours for 32 grantees to compile the information; and 2,000 or more students in the testing pool equals approximately 28 hours for 24 grantees to compile the information.

- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in item 13 of OMB Form 83-1.**

This request covers only one form.

- **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 not be included in Item 14.**

Annualized cost to respondents is estimated at \$452 based on \$22.58 per hour salary times 20 hours to search files, compile and submit information = \$452. Wage rate category is based on an average annual salary of \$35,000 for student drug-testing grantees (ED grant application files) and an average annual number of hours worked of 1,550 (Characteristics of Schools, Districts, Teachers, Principals, and School Libraries in the United States: 2003-04 Schools and Staffing Questionnaires, U.S. Department of Education, Institute of Education Sciences (<http://nces.ed.gov/pubs2006/2006313.pdf>)).

**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.)**

None.

- **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 record storage facilities.**

There are no capital or start-up costs required for this information collection.

- **If the cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance.**

None.

- **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.**

This information collection does not require contracting out collection services.

- 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 practices.

Total Annualized Capital/Startup Cost: 0

Total Annual Costs (O and M): 0

Total Annualized Costs Requested: 0

**14. Provide estimates of annualized cost to the Federal government. Also provide a description of the method used to estimate cost, which should include a quantification of hours, operation expenses (such as equipment), overhead, printing, and support staff, and other expense that would not have been incurred without this collection of information.**

Time needed to review each submission is estimated at 15 minutes times 83 submissions equals 20.75 hours @\$45 per hour equals \$933.75.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.**

This is a new collection. Therefore, the entire burden is new.

**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.**

Information from this collection will be used to inform the public, the press, and members of Congress both orally through speeches and other presentations and in documents published by ED and ONDCP about the status of implementation among ED's student drug-testing grantees. Results of this collection will not be published as a separate report.

**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.**

Not applicable. ED will display the expiration date for OMB approval of the information collection.

**18. Explain each exception to the certification statement identified in Item 20 "Certification for Paperwork Reduction Act Submission," of OMB Form 83-I.**

No exceptions are requested.

## **B. Collection of Information Employing Statistical Methods**

**The agency should be prepared to justify its decision not to use statistical methods in any cases where such methods might reduce burden or improve accuracy of results. When Item 17 on Form 83-I is check "Yes," the following documentation should be included in the supporting statement to the extent that it applies to the methods proposed:**

Not applicable.

