MEMORANDUM

DATE: February 16, 2007

TO: Rachel Potter
            OIRA/OMB

FROM: Deborah Rudy
            Office of Safe and Drug-Free Schools

SUBJECT: Revised Information Collection – Safe Schools/Healthy Students

The purpose of this memorandum is to seek clearance of a revised information collection for the Safe Schools/Healthy Students initiative. Specifically, this collection is a revision of a previously cleared collection (1865-0004), the program's application package. We request that the revised collection be approved for a period of three years.

Generally, our proposed revisions to this collection have been carefully considered and designed with two goals in mind. First, we have identified a limited number of requirements that we believe are correlated with successful, well-managed SS/HS projects, and have included those in the notice of proposed priorities, application requirements, selection criteria, and definitions. We have revised the information collection accordingly.

Second, we have reduced or eliminated requirements and selection criteria that have been problematic for applicants and peer reviewers or that have not helped peer reviewers identify high quality grant applications, and have revised the information collection to reflect these changes.

We are proposing several changes to the Safe Schools/Healthy Students initiative (via a Notice of Proposed Priorities (NPP)) that will impact respondent burden and that are reflected in the revised information collection. We believe that some of these changes will decrease respondent burden, others will minimally increase burden, but that overall burden for the revised collection remains unchanged. As a result, we have retained the same per respondent burden estimate for this revised package as that for the previously cleared package. We have included a Paperwork Reduction Act (PRA) section in the

Notice of Proposed Priorities that will provide an opportunity for the public to comment on PRA issues, including burden.
 Specifically, we have:

- simplified requirements for the memorandum of agreement that must be submitted with the application;
- reduced the number of sub-criteria that applicants are required to respond to; and
- required applicants to include a logic model (a graphic representation of major elements of their project) as part of their application.

We modified the previous requirement for applicants to submit two different partner agreements with their application. One of the agreements detailed partner roles and responsibilities; the other described the protocols to be used by schools and the local public mental health authority related to provision of mental health services to students. We propose that applicants now submit a single agreement at the time of application, identifying the required partners and demonstrating their commitment to the project. We have added a requirement for a final agreement (but only for successful grantees, not all applicants) that will provide more detailed information about project management and implementation. This second agreement will be negotiated among initiative partners during the first months of the grant. This change is designed to simplify application requirements and reduce burden for applicants, in part by requesting information that had previously been included in the application (for example the mental health protocols) only from grantees, not from applicants.

We also closely examined selection criteria for the initiative, and have made a significant reduction in the number of subcriteria in this revised collection (down from 25 subcriteria to 15). Specifically, we reviewed the criteria with an eye to eliminating subcriteria that have not been clearly understood by applicants and peer reviewers, as well as those subcriteria that did little to distinguish applications based on their quality. We propose revised criteria (via the NPP) that should assist applicants in crafting project narratives that connect problems, goals/objectives, programming, and evaluation strategies, as well as demonstrating a strong management plan.

We also propose that applicants include a logic model with their application. Many applicants (and grantees) have found it challenging to develop a project narrative that appropriately connects the results of community needs assessment with project goals and objectives, program activities, and evaluation and measurement strategies. Grant sites from the fiscal year 2005 and 2006 cohorts of this initiative have used the logic model tool on a voluntary basis, and both grantees and Federal project officers have found the use of a logic model to be a very valuable organizing tool for implementing and managing SS/HS projects.

Please let me know if you need any additional information.