

**SURVEY OF SAFE AND DRUG FREE (SDFS) STATE COORDINATORS ABOUT STUDENT
DRUG TESTING PROGRAMS (SDT)**

Supporting Statement A

Request for Office of Management and Budget Review and Approval
for Federally Sponsored Data Collection
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§1320.5 General Requirements

Additional information on these requirements can be found in Supporting Statement B

An Evaluation of the Need for the Collection of Information

As part of the President's National Drug Control Strategy, President Bush identified several key areas that were to be the focus of the Office of National Drug Control Policy's efforts for Fiscal Year 2008. In addition to such efforts as controlling the flow of drugs across the Southwest Border and prescription drug safety, the President identified Student Drug Testing programs as an important strategic focus.

According to the National Drug Control Strategy Annual Report, "random testing gives students a powerful incentive to abstain from drug use."¹ For this reason alone, the establishment of Random Student Drug Testing programs (RSDT) is a valuable tool in the efforts to keep children off of drugs. To this end, the Department of Education has distributed competitive State grants for the Safe and Drug Free Schools and Communities (SDFSC) grant program as well as SDFSC Program funds that can be used for RSDT. While the efforts of the Department of Education are invaluable to the initiation of the programs in schools, the Department is in need of support to collect information on how the State Educational Agencies (SEAs) are using the grant funds. As ONDCP is the agency in charge of executing the President's Drug Control Strategy, we are undertaking this data collection.

The Department of Education does not currently collect information on this topic. While it will benefit ONDCP to collect the information, for use in our measures of our own success in executing the President's Drug Control Strategy, the information will be shared with the Department of Education as well.

The primary purpose of this survey is to gain a greater understanding of state and local level support for RSDT programs so as to better target scarce Federal resources.

Evaluation of Public Comments Received from Publication in the Federal Register

ONDCP received a single response to the Federal Register Notices from Ms. Reba Architzel, the Director of Grants Management and Federal Policy in the New York State Office of Alcoholism and Substance Abuse Services (Attachment A8.1). Ms. Architzel recommended expanding the scope of the survey to collect more information from the State agencies. ONDCP will not be adopting Ms. Architzel's recommendations in an effort to keep the survey instrument and the burden on the State agencies as small as possible.

60-day notice in the Federal Register

Posted on January 14, 2008 in Volume 73, Number 9

The text of this notice can be obtained from Meredith DeFraités, (202) 395-5276

30-day notice in the Federal Register

Posted on April 1, 2008 in Volume 73, Number 63

The text of this notice can be obtained from Meredith DeFraités, (202) 395-5276

¹ *The National Drug Control Strategy: 2008 Annual Report*, P. 7

Payment or Gift to Respondents

There will be no payment or gift paid to respondents.

The Use of Automated Technology

While ONDCP will not be using automated technology in the distribution of the survey, respondents are encouraged to respond via E-mail or fax. The responses to the survey questions are generally simple in nature (i.e., requiring answers of only “yes” or “no”) and in other circumstances may be anecdotal. There is further explanation of the use of automated technology under §1320.8.

A Summary of the Collection of Information and the Need Therefore

The purpose of this survey is to gain a greater understanding of state and local level support for Student Drug Testing (SDT) programs so as to better target scarce Federal resources. Currently, Federal support for SDT programs is available through two mechanisms: (1) competitive discretionary grants from the U.S. Department of Education (ED), authorized by Safe and Drug-Free Schools and Communities (SDFSC) National Programs, and (2) SDFSC State Grants Program funds when States and local educational agencies (LEAs) elect to use funds from this formula grant program to support SDT programs.

ED has developed and published requirements, consistent with rulings by the U.S. Supreme Court, for its Grants for School-Based Student Drug Testing Programs grant competition. Under this initiative, which is designed to support mandatory random and voluntary SDT programs, grantees develop and implement, or expand, school-based mandatory random or voluntary drug-testing programs for students in one or more grades 6 through 12. Any SDT program conducted with funds awarded under this discretionary grant program must include at least one of the following:

- (1) Students who participate in the school's athletic program;
- (2) Students who are engaged in competitive, extracurricular, school-sponsored activities;

and

- (3) A voluntary drug-testing program for students who, along with their parent or guardian, have provided written consent to participate in a random drug-testing program.

Applicants that propose voluntary drug testing for students who, along with their parent or guardian, provide written consent must not prohibit students who do not consent from participating in school or extracurricular activities.

Recipients of funding under the SDFSC State Grants Program may also elect to use funding to support SDT program. Under the program, ED awards grants to State educational agencies (SEAs) and to Governors, to support a broad range of drug and violence prevention activities. SEAs award at least 93 percent of their funding to LEAs based on a formula that includes enrollment and an LEA's relative share of Title I funds. Governors award funds competitively, through grants and contracts.

Additional information on the need for the collection of this information can be found under §1320.8.

The Reporting and Recordkeeping Burden

A further explanation of the reporting burden can be found under §1320.8.

There are no other costs associated with this information collection: there is neither start up costs nor costs associated with operation or maintenance. Respondents are not asked or expected to purchase any services. ONDCP believes that State Educational Agencies are already in possession of the information sought, as part of the regular course of their relationships with Local Educational Agencies.

The Annualized Cost to the Government

All costs to the government are onetime, because this is a onetime data collection. The costs to the government include the costs of labor for analysts already employed by the federal government and the cost of materials. Both costs are nearly negligible. The analyst in charge of data collection will receive the data in the course of her regularly scheduled duties. She will engage in data collection and compilation during regular business hours and interspersed with other duties assigned her by ONDCP.

The cost of materials will be the cost of 204 sheets of paper, 51 envelopes, and postage for shipping these items. A rough estimate could be:

$$[(\leq \$0.01/\text{sheet}) \times 204 \text{ Sheets}] + [(\$0.03/\text{envelope}) \times 51 \text{ Envelopes}] + [(\$0.42/\text{envelope postage}) \times 51 \text{ Envelopes}] = \$24.99^2$$

The Likely Respondents

The recipients of the survey instrument will be State Educational Agencies in the fifty states and the District of Columbia. The survey is a one-time collection of information readily available to State Educational Agencies, regarding state and local agencies affected by the grants distributed by the US Department of Education.

The Least Burdensome Method Possible

ONDCP finds it necessary to collect this information, which is not currently available from any other source. In order to effectively assess whether the distribution of Safe and Drug Free Schools and Communities funds are helping to achieve the President's Drug Control Strategy objectives, ONDCP must determine how such funds are being used. The survey in question consists of five questions, most of which are answerable with either "yes" or "no" and all of which relate to information that the State Educational Agencies are already in the habit of collecting.

Efforts to Identify Duplication and Use of Similar Information

ONDCP worked with the US Department of Education in an effort to find the information requested in this survey instrument. The US Department of Education does not currently collect this information. It is unlikely that any other federal agency would have collected this information, as narrowly restricted to education matters as the Safe and Drug Free Schools state grant program is.

Consequences of Collecting the Information Less Frequently

² Cost of materials estimates obtained from www.staples.com and www.usps.com, respectively.

This survey is a onetime collection of information. To collect the information less frequently would be to not collect the information at all and thus to deprive ONDCP and the US Department of Education of valuable information. The information collected may be the basis for future policy decisions. Collecting the information at this time would be appropriate, as RSDT is a major area of concern in the President’s National Drug Control Strategy.

§1320.8 Agency Collection of Information Responsibilities

A Functional Description of the Information to be Collected

ONDCP is charged with the execution of the President’s National Drug Control Strategy, with special emphasis on the areas denoted therein as “priorities.” Student Drug Testing is a vital part of the federal government’s demand reduction efforts. ONDCP wishes to conduct this survey focusing on the factors leading to the establishment of RSDT programs on the local level and the information collected by the State on these programs. The survey consists of 5 questions—each question broken into subparts—mostly answerable by checking “yes” or “no” on the appropriate line next to the question.

A Plan for the Collection of Information

A single hard-copy survey instrument will be used to poll State Educational Agencies. Data will be collected one time, with all survey responses to be collected by July 31, 2008. The survey will help ONDCP and the Department of Education to determine what use Safe and Drug Free Schools state grants have been in initiating and sustaining RSDT programs.

The survey questions request information collected by SEAs about the implementation of RSDT programs at the state and local levels, the use of SDFS grant funds, and the decision to create RSDT programs.

The information collected will help ONDCP understand the benefits and difficulties encountered by SDFS state grant recipients who use those funds to create RSDT programs. This may also help the U.S. Department of Education to hone the SDFS grants to be more useful. The information collected will also assist ONDCP in understanding the objectives achieved under the President’s National Drug Control Strategy.

A Specific, Objectively Supported Estimate of Burden

This survey is directed to the State Educational Agencies, but not to any particular person within that agency. Thus, the task of filling out the responses can be delegated to any person with access to the records in question.

Table A Annualized Burden

Number of Respondents	Annual Number of Responses	Average Burden Per Response (in hours)	Total Burden (in hours)
51	1	1/6	8 1/2

Table B Annualized Costs to Respondents

Number of Respondents	Annual Number of Responses	Estimated Cost of Respondent Employee's Time*	Cost of Postage/ Estimated Cost of Outgoing Fax	Total Respondent Cost
51	1	\$ 5.00	\$ 0.42	\$ 5.42

*The \$5 cost burden is based on the assumption that the survey responses may be delegated to anyone with access to the relevant records. For persons employed in a clerical capacity, the estimate of a \$30/hr wage is not unreasonable.

An Evaluation of the Effects of Reducing the Burden on Respondents by the Use of Automated, Electronic, Mechanical, or Other Technological Collection Techniques

Although the survey is being distributed as a hard copy via the US Postal Service, respondents are encouraged to reply via e-mail and fax. The collected information will be entered into an electronic database for ease of review and exchange with the U.S. Department of Education.

ONDCP intends to accept submission of survey information through the mail, through e-mail, and via fax to ease the burden of response. For those SEAs that are not comfortable with submitting their information through electronic media, there is the option to respond in hard-copy through the USPS.

The creation of an internet survey would likely require the use of more ONDCP resources than the tangible version required. Additionally, some of the SEAs may not be online and thus would not be able to access the survey instrument.

Applicability of Testing the Collection of Information through a Pilot Program

Because there are no statistical methods or sampling involved and because the survey instrument is simple, there is no need for testing.

However, ONDCP has previously surveyed State agencies for the "Major Cities" Federal, State, and Local Drug Control Funding database and has found their responses to be timely and thorough. The response rate for State agencies that were polled was above 90%. In that information collection, the survey instrument was similar in terms of complexity and length.

The survey instrument was subjected to interagency review, as well as review by U.S. Department of Education analysts. Within ONDCP, the survey was reviewed by a number of individuals, many of whom have previous experience with surveying methods and analysis.

The Plan for the Management and Use of the Information Collected; Time Table for Collection and Use

Because the data is largely anecdotal, rather than statistical, the information will not need to be tabulated. Additionally, the information collected in this survey will be used in future grant and policy formulations, rather than published in its own right.

The timetable for the collection and analysis are as follows:

June 2008: Distribute survey instrument

July 2008: Collect survey information

August 2008: Share information with US Department of Education and incorporate responses into policy analysis.

Voluntary Responses

ONDCP does not require SEAs to respond to the survey, although they are strongly encouraged to do so.

Sensitivity of Questions and Confidentiality of Responses

The nature of the information sought is neither sensitive nor requiring confidentiality, as the answers to the questions are likely available to any individual willing to seek it.

Display of Currently Valid OMB Control Number and Expiration Date

Because ONDCP's timeline is shorter than the six months allotted by OMB, there is no reason not to display the OMB Expiration date. If OMB requires the date to be printed on the survey instrument, ONDCP will comply.