

# **Request for Clearance**

## **“Study of the Implementation of the Safe and Drug-Free Schools and Communities Act Program State Grants”**

Submitted to:

The Office of Management and Budget  
Human Resource Programs  
Education Branch  
Washington, DC 20503

Submitted by:

U.S. Department of Education  
Office of Planning, Evaluation, and Policy Development  
Policy and Program Studies Service  
Washington, DC 20202

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## REQUEST FOR CLEARANCE

### STUDY OF THE IMPLEMENTATION OF THE SAFE AND DRUG-FREE SCHOOLS AND COMMUNITIES ACT PROGRAM STATE GRANTS

#### SECTION A. JUSTIFICATION

##### A.1. Need for Collecting This Information

The purpose of the Study of the Implementation of the Safe and Drug-Free Schools and Communities Act Program State Grants is to gauge progress in increasing the prevalence and quality of research-based prevention programs in public elementary and secondary schools nationally and those funded by the Safe and Drug-Free Schools and Communities Act (SDFSCA) Program. As such, this study will collect critical information about the SDFSCA Program, as authorized by Title IV, Part A, Subpart 1 of the Elementary and Secondary Education Act of 1965, as amended (ESEA). Specifically, the information will allow the Department of Education (ED) to assess the overall quality of activities that are being implemented by grantees and to provide followup data for performance measures to meet Government Performance and Results Act (GPRA) and the Program Assessment Rating Tool (PART) review requirements for the Program. A previous study sponsored by ED provided the initial or baseline data for these measures, which are: (a) the percentage of drug and violence prevention programs/practices supported with SDFSCA state grants funding that are research-based, and (b) the percentage of SDFSCA-funded research-based drug and violence prevention curriculum programs that are implemented with fidelity; the proposed study will provide follow-up data for the measures. We are requesting that OMB approve a set of revised survey instruments that were previously approved for obtaining the required baseline data.

The U.S. Department of Education is authorized by Section 4121 of the ESEA to evaluate activities funded through the SDFSCA Program. In addition, the ESEA requires that ED report on several aspects of illegal drug use and violence in elementary and secondary schools, including their incidence and prevalence. This study will examine one type of activity that receives SDFSCA-funding, prevention programs, by measuring the prevalence and fidelity of research-based programs.<sup>1</sup> The study will not examine other types of activities that receive SDFSCA funding, which include but are not limited to: (a) community-wide planning and organizing activities to reduce violence and illegal drug use, (b) acquiring

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<sup>1</sup> Defining quality in terms of whether activities are research-based is consistent with the No Child Left Behind Act requirement that SDFSCA-funded activities adhere to the "Principles of Effectiveness," one of which is that activities should be research-based. For more information, see: ESEA, Section 4115.

and installing metal detectors or other related equipment and technologies, and (c) reporting criminal activities committed on school property.

The Study of the Implementation of the Safe and Drug-Free Schools and Communities Act Program State Grants is part of a comprehensive set of studies sponsored by ED that will help to meet its goals for the SDFSCA Program. In particular, this study will build on the foundation established by previous studies, including the Study of the Implementation of Research-Based Programs to Prevent Youth Substance Abuse and School Crime (i.e., precursor study that provided baseline data on the GPRA/PART measures for the SDFSCA Program), National Study of School Violence and Prevention (SSVP) and School-Based Drug Prevention Programs: A Longitudinal Study in Selected School Districts, that together focused on examining the types and funding sources of programs being implemented and the extent to which sound planning and implementation processes are used for the programs. The goal of the current study is to provide the first followup data on the extent to which SDFSCA-funded prevention efforts in schools are based on sound, research-based principles.

As a part of the national effort to provide programming in the schools and, through other social service agencies, to prevent youth alcohol, tobacco, and other drugs (ATOD) use and school crime in this country, the SDFSCA Program provides funding to states to support prevention programs. Each state has both a State Education Agency (SEA) Program and a Governors' Program. Under the current legislation, the SEAs allocate funds to school districts by formula (based on Title I grants and student enrollment); the Governors' Programs award grants to community agencies and public and private nonprofit entities. The districts and other grantees support prevention activities at the school and community levels. Providing nearly \$300 million in state grants and reaching schools in practically all school districts, this program is the largest and broadest school-based youth ATOD use and school crime prevention program nationally. The current study will examine only the SEA Program.

A clarification on the use within this study of various selected terms is useful here. The term *SDFSCA Program* refers to the formula grant program administered by the U.S. Department of Education and implemented in school districts and communities through SEAs. A *prevention program* is an intervention or set of interventions put in place with the intention of reducing problem behavior in a population of youth or to establish and maintain a safe and orderly learning environment. A *school-based prevention program* is one that, regardless of funding source, is primarily delivered in a school building (even if outside of school hours) or is implemented by school staff or under school or school system auspices, and includes any of the levels from kindergarten through high school.

### **A.1.1. Overview of Proposed Study**

In this section, we introduce the current study, which follows closely the methods used by the previous study that provided baseline data for the required GPRA/PART measures (Study of the Implementation of Research-Based Programs to Prevent Youth Substance Abuse and School Crime). The introduction includes a description of the study questions, the conceptual framework of the study, and study design.

#### **Study Questions**

In addition to using information from the proposed study to meet legislative requirements, ED is interested in obtaining information that will help it to improve administration of this program. To meet these objectives, the study will seek to answer the following three research questions.

1. Which youth ATOD use and/or school crime prevention programs and practices are research-based and have been shown to be efficacious or effective?
  - 1a. Which youth ATOD use and/or school crime prevention programs have been identified previously as research-based, and does research conducted from 2004 to 2008 continue to support these programs and/or identify additional programs?
  - 1b. What evidence does literature from 1983 to 2008 offer as to the efficacy and effectiveness of these programs and practices?

The first research question focuses on the extent to which currently available evidence qualifies programs and practices as research-based, and on the magnitude of effects found for such programs and practices. Research subquestion 1a is driven by the need to identify research-based programs that will be the subject of activities designed to answer questions 2 and 3. Subquestion 1b is intended to provide information on the magnitude of effect of the research-based programs and of general practices that cut across specific programs and contribute to the achievement of desired outcomes.

2. What proportion of youth ATOD use and/or school crime prevention programs, nationally and among those receiving funding from the SDFSCA Program, are research-based?
  - 2a. What proportion of schools is implementing research-based youth ATOD use and/or school crime prevention programs?
  - 2b. What proportion of SDFSCA-funded programs is research-based?

- 2c. What factors are associated with the adoption of research-based youth ATOD use and/or school crime prevention programs?

This research question tackles the important issue of adoption by schools of research-based prevention programs. Subquestion 2a focuses on programs regardless of their funding sources, while subquestion 2b narrows the scope to include only those receiving funding from the SDFSCA Program. As mentioned, ED has particular interest in the use of SDFSCA Program funding for research-based prevention programs and other authorized activities (e.g., community-wide planning and organizing activities to reduce violence and illegal drug use), because the ESEA requires that those funds be used to support only research-based activities. Subquestion 2c focuses on the factors that are associated with adoption by schools of research-based programs. The answers may point to possible administrative improvements (e.g., related to the availability of information from ED on specific research-based programs) that can boost adoption.

3. To what extent, nationally and among those receiving funding from the SDFSCA Program, are research-based youth ATOD use and/or school crime prevention programs implemented with fidelity?
  - 3a. What proportion of research-based youth ATOD use and/or school crime prevention programs is being implemented with fidelity?
  - 3b. What proportion of research-based SDFSCA-funded programs is being implemented with fidelity?
  - 3c. What factors are associated with implementing with fidelity research-based youth ATOD use and/or school crime prevention programs?

The third question recognizes that achieving desired outcomes requires both offering research-based programs and implementing them well. Subquestion 3a pertains to all research-based programs, while subquestion 3b targets those research-based programs receiving SDFSCA Program funds. Subquestion 3c focuses on the factors that are associated with the quality of implementation of programs adopted by schools. The answers may point to possible administrative improvements (e.g., related to quality and amount of training on implementation) that can enhance the quality of implementation.

### **Conceptual Framework**

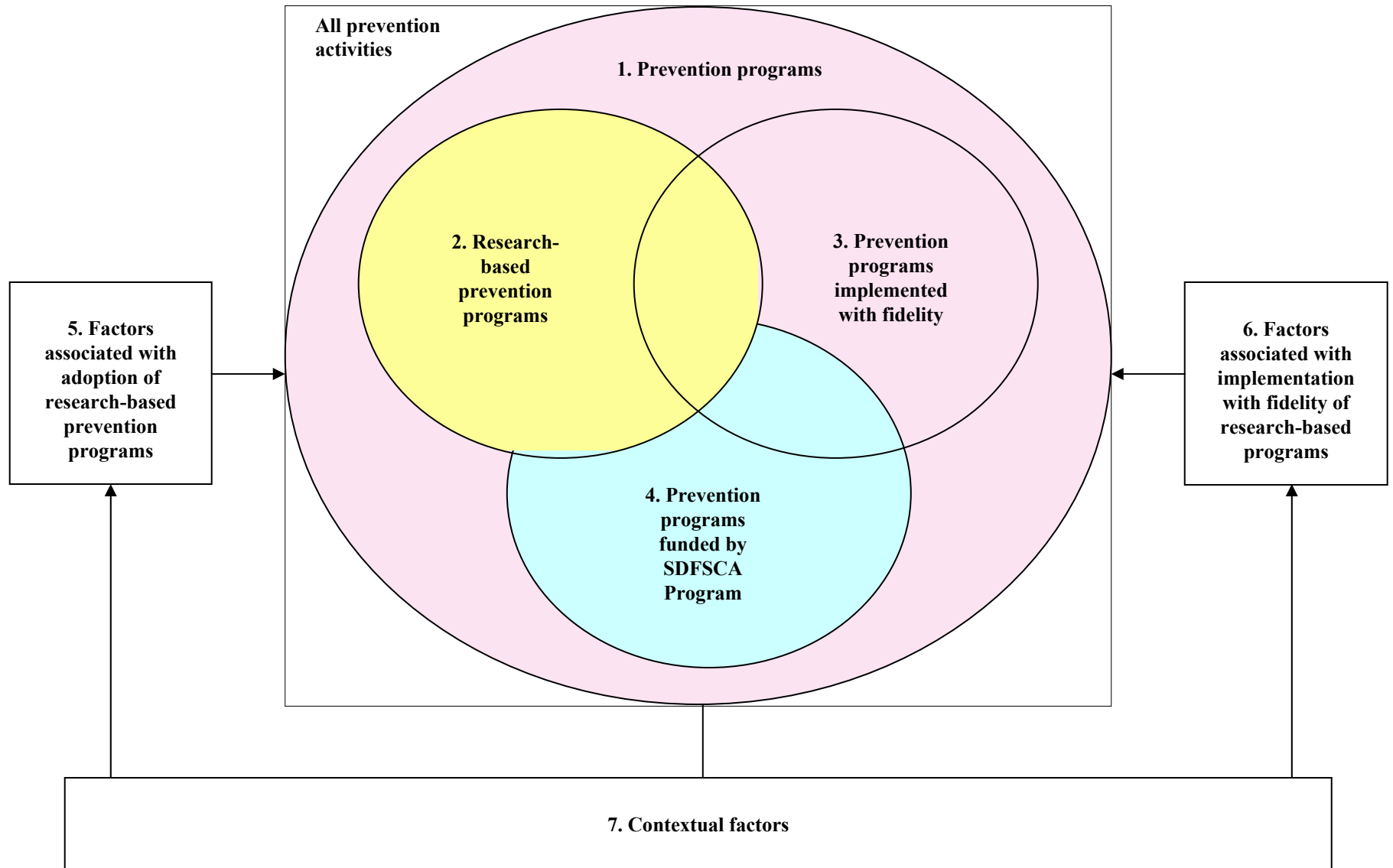
We plan to use a conceptual framework to help guide the study. This conceptual framework identifies the main topics of interest: adoption and implementation of research-based programs in schools



and the factors associated with them (see Figure 1). The study will measure and analyze variables from each of the following components.

- **Prevention programs (Area 1)**—This is the universe of interventions put in place in schools with the intention of preventing or reducing youth ATOD use and school crime. As indicated by the box enclosing Area 1, prevention programs are among a diverse range of activities that can be used to achieve those objectives.
- **Research-based prevention programs (Area 2)**—A subset of all prevention programs in schools, these programs are supported by rigorous research that indicates they consistently prevent or reduce youth ATOD use or school crime. They vary on quality of implementation.
- **Prevention programs implemented with fidelity (Area 3)**—A subset of all prevention programs in schools, these programs are implemented in ways that meet the standards established by their developers. They include research-based programs and other programs. Of all the prevention programs operating in schools, research-based programs implemented with fidelity are the most likely to successfully prevent or reduce youth ATOD use and school crime.
- **Prevention programs funded by the SDFSCA Program (Area 4)**—A subset of all prevention programs in schools, these programs receive funding from the SDFSCA Program. They include research-based programs and other programs; and they vary on quality of implementation. As mentioned in Section A.1, the Principles of Effectiveness require that all SDFSCA-funded programs and other activities be research-based.
- **Factors associated with adoption of research-based prevention programs (Area 5)**—These factors can potentially affect whether schools adopt research-based prevention programs. They include relatively direct factors, such as the availability of funding and aspects of the program selection process that operates at the district level. They also include relatively indirect factors, such as whether district staff receive technical assistance from SEAs on program selection and federal policy supporting the use of research-based programs.
- **Factors associated with implementation with fidelity of research-based prevention programs (Area 6)**—These factors can potentially affect the quality of implementation of the research-based prevention programs operating in schools. They include proximal factors, such as the use of implementation materials by program providers, and the quality and amount of training on the programs. They also include distal factors, such as the extent to which district staff monitor and evaluate programs, and districts and SEAs are accountable for the performance of their prevention programs.

Figure 1. Preliminary conceptual framework for understanding adoption and implementation of prevention programs in schools



- **Contextual factors (Area 7)**—These factors represent the environment in which all of the other components in the framework operate. They include school, district, and community characteristics, such as: school instructional level and student characteristics, district enrollment, and urbanicity. Such factors remind us that the prevention programs in schools operate within dynamic organizations and settings that can indirectly facilitate or impede them.

## Study Design

The design of the study has three main components—Identification Study, Prevalence Study, and the Fidelity Study. For the Prevalence Study and Fidelity Study components, the study will collect information about the SDFSCA SEA Program. Each of the components parts is described in this section and Table 1.

**The Identification Study** will provide answers for the first research question concerning the programs and practices that are deemed effective. The previous study (Study of the Implementation of Research-Based Programs to Prevent Youth Substance Abuse and School Crime) indicated that identifying research-based practices and specific named programs required separate approaches. To identify practices, we will update the review of meta-analyses (conducted for the previous study) that provided quantitative results, across many studies, on the effectiveness of practices and general program types. To identify specific programs, we will update the review (conducted for the previous study) of over 1,000 individual studies on programs that were judged to be effective by external sources.

To identify **practices** that consistently yield sizable positive effects on behavior problems, we will update the review of meta-analyses on the prevention of youth ATOD use and school crime (including violence). The previous review covered meta-analyses published from 1983 to 2004 on efforts to prevent or reduce youth ATOD use and school crime; we will extend it to include meta-analyses published through 2008. Based on those meta-analyses, we will update the database of the reported effect sizes.<sup>2</sup> This database consists of over 200 effect sizes, organized by type of outcome and by different practices and general program types. We will review the findings for practices and general program types to flag those that had consistently high effect sizes across diverse types of outcomes.

Developing a list of **programs** for the study will entail compiling and screening existing lists of research-based prevention programs, reviewing literature on the programs that pass the screens, and making judgments on whether the programs achieve high levels of effectiveness. We discuss these tasks in the subsections that follow.

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<sup>2</sup> Effect sizes are standardized measures of treatment effectiveness, typically in relation to a comparison group.

**Table 1. Crosswalk of study questions, study components, and domains of variables**

Study question	Study component	Domain of variables*
1. Which youth ATOD use and/or school crime prevention programs and practices are research-based and have been shown to be efficacious or effective?	Identification Study <ul style="list-style-type: none"> <li>■ Systematic review of existing meta-analyses on effective prevention practices</li> <li>■ Systematic review of existing literature on research-based prevention programs</li> <li>■ Meta-analysis on research-based prevention programs indicated by the systematic review of programs</li> </ul>	Research-based prevention programs (Area 2)
2. What proportion of youth ATOD use and/or school crime prevention programs, nationally and among those receiving funding from the SDFSCA Program, are research-based?	Prevalence Study <ul style="list-style-type: none"> <li>■ Prevalence Survey</li> <li>■ District Survey</li> </ul>	Intersection of: <ul style="list-style-type: none"> <li>■ Prevention programs (Area 1)</li> <li>■ Research-based prevention programs (Area 2)</li> </ul> Intersection of: <ul style="list-style-type: none"> <li>■ Prevention programs (Area 1)</li> <li>■ Research-based prevention programs (Area 2)</li> <li>■ Prevention programs funded by SDFSCA Program (Area 4)</li> </ul> Factors associated with adoption of research-based programs (Area 5)
3. To what extent, nationally and among those receiving funding from the SDFSCA Program, are research-based youth ATOD use and/or school crime prevention programs implemented with fidelity?	Fidelity Study <ul style="list-style-type: none"> <li>■ Provider Survey</li> <li>■ Interviews with program developers</li> <li>■ Results from Prevalence Study</li> </ul>	Intersection of: <ul style="list-style-type: none"> <li>■ Prevention programs (Area 1)</li> <li>■ Research-based prevention programs (Area 2)</li> <li>■ Prevention programs implemented with fidelity (Area 3)</li> </ul> Intersection of: <ul style="list-style-type: none"> <li>■ Prevention programs (Area 1)</li> <li>■ Research-based prevention programs (Area 2)</li> <li>■ Prevention programs implemented with fidelity (Area 3)</li> <li>■ Prevention programs funded by SDFSCA Program (Area 4)</li> </ul> Factors associated with implementation with fidelity of research-based programs (Area 6)

\* The domains of variables are based on the conceptual framework (see Figure 1).

- **Compiling and screening lists.** This step will focus on identifying programs that have been added to lists since the previous study. While we had planned to include only those lists that met explicit criteria on stringent inclusion criteria, those criteria are often vague. We also became concerned that even lists that used less stringent criteria could include both highly effective *and* less effective programs. Hence, to be comprehensive, we will begin with a master list developed by Mihalic in 2007.<sup>3</sup> This master list aggregates 12 existing lists of programs intended to prevent problem behavior. Even though the 12 individual lists frequently overlap on programs, the master list contains over 300 programs, some of which are not focused on school-based prevention. To reduce the list to the potentially most relevant programs, two research staff will independently screen each of the programs added to the master list on the following criteria: (a) school based, (b) focused on prevention of ATOD use or school crime/delinquency, and (c) applicable to school-age youth.
- **Reviewing literature and making judgments on programs.** We plan to gather and review research literature on the newly added programs that survive the screening process; we also will gather and review any literature on the programs considered in the review for the previous study. First, we will conduct extensive automated searches for the published literature. Second, we will further screen the programs on whether they had studies on them that met at least minimally acceptable methodological standards and on whether mechanisms are in place to support widespread dissemination of the programs. Third, two mid- to senior-level staff with strong methodology skills will independently review each research document on the surviving programs. The reviewers will use a standardized coding form to capture information from studies on several methodological criteria (e.g., used experimental design or strong quasi-experimental design). Fourth, for the programs with two independent studies that meet these criteria, we will conduct an in-depth assessment of the level of effectiveness indicated by the studies. We will assess whether the preponderance of available evidence supports the effectiveness of each program, and recommend that the programs with this level of support be included on the list of research-based programs for the study.
- **Determining the final list.** Once the research-based programs have been identified, a panel--of survey design experts and experts in the fields of youth ATOD use and school crime prevention programs--will convene to review the selected programs. The panel will be asked to examine the appropriateness of the programs selected for inclusion and to suggest other programs that may have been missed through this process. Those programs remaining on the list will form the basis of analysis for the Prevalence Study and the Fidelity Study.

The **Prevalence Study** will consist of two separate data collections—a national survey of schools and a national survey of districts. Results of the survey of schools will identify those schools that have research-based programs. They are the schools that will participate in the Fidelity Study.

The school and district portions of the Study of the Implementation of the Safe and Drug-Free Schools and Communities Act Program State Grants will be based on a national probability sample

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<sup>3</sup> See: <http://www.colorado.edu/cspv/blueprints/matrixfiles/matrix.pdf>.

of schools and conducted in several steps. Once the Identification Study identifies the research-based programs, the next steps will be to survey schools with the “Prevalence Survey”—on whether research-based programs are operating in the schools--and survey districts in which the responding schools are located with the “District Survey”—on funding and district-wide prevention efforts.

**Conducting the Prevalence Survey.** The school prevention program coordinator will receive a questionnaire that will ask for information about youth ATOD use and school crime prevention programs that operate in his/her school. Specifically, the respondent will be asked to identify all youth ATOD use and school crime prevention programs from a list, to indicate whether the program is funded by SDFSCA, and to identify the persons most knowledgeable about each program. The questionnaire will be web based, with many skip patterns that can be easily navigated by the school prevention program coordinator. For those coordinators without access to the web, a paper-and-pencil version of the instrument will be provided. The results of this study will provide answers for the second research question concerning the proportions of programs and schools with research-based programs, including those programs receiving support from the SDFSCA Program.

**Conducting the District Survey.** Districts with schools that respond to the Prevalence Survey Westat will be included in the District Survey. A district prevention coordinator in those districts will be surveyed on whether each of the programs reported by schools in the Prevalence Survey is funded by SDFSCA. The District Survey, which will be web-based, also will obtain information about district-level prevention policies and programming that may have an impact on a school’s prevention activities.

The **Fidelity Study** will consist of two separate data collections—a survey of schools and interviews with developers of research-based programs. The survey of schools—“Provider Survey”—will assess the degree to which the schools using research-based curriculum programs (as identified by the Identification Study) implement them with fidelity to the research on which they are based.<sup>4</sup> The interviews with the developers of those research-based curriculum programs will provide information on the standards for implementing their programs.

**Conducting the Provider Survey.** Those schools with research-based curriculum programs will be asked to complete a web-based program provider questionnaire. We will ask the program’s representative to respond to a questionnaire that asks about a variety of program dimensions: program goals/objectives, planning and training, and aspects of implementation of the program (e.g., content, methods of delivery, extent of use, and degree of student exposure).

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<sup>4</sup> The previous study indicated that the majority of prevention programs implemented were curriculum-based

**Interviewing Program Developers.** The developers of the research-based programs identified in the Identification Study will be asked to provide information over the telephone on how their programs should be implemented to achieve their intended objectives. This information will permit a comparison of how a specific program is implemented in a school—based on the Provider Survey—against standards for implementation—based on the interviews with program developers. If program developers are unable or unwilling to provide information on their programs, the study will extract it from program implementation materials.

#### **A.1.2. Instrumentation for Examining SDFSCA Programs**

To provide an accurate and comprehensive picture of the implementation of SDFSCA programs nationwide, the study will use tested data collection methodologies. The respondents and instruments for each major study component are summarized in the following sections. Copies of the draft instruments are included as appendices to this clearance request. After OMB approval is received, data will be collected for the Prevalence Study in spring/summer 2009 and for the Fidelity Study in fall 2009. Table 2 provides information about the data collection activities to be conducted using these instruments.

##### **Instruments for the Prevalence Study**

For the Prevalence Study, the respondents for the study are the school staff in the schools who are most knowledgeable about prevention efforts in their schools and district prevention program coordinators for the responding schools. The instruments for this study component are as follows. (See Appendices A-1 and A-2 for copies of the instruments.)

- Prevalence Questionnaire (one per school), and
- District Questionnaire (one per district).

**Table 2. Data collection activities and schedule for Study of Implementation of Safe and Drug-Free Schools and Communities Act Program State Grants**

Instrument	Number of respondents/ responses	Data collection period	Format and length of instruments	Topics covered
<b>Prevalence Study</b>				
Appendix A1: Prevalence Questionnaire	6,000 school prevention program coordinators (i.e., school staff in each sampled schools who is most knowledgeable about prevention efforts in school)	Spring 2009	Web-based survey with telephone followup; 30 minutes	Used to obtain information on programs operated during the 2008-09 school year, contact information for program coordinators
Appendix A2: District Questionnaire	3,800 district prevention program coordinators	Spring-summer 2009	Web-based survey with telephone followup; 30 minutes	District characteristics; planning, implementation, and evaluation of district prevention program; SDFSCA funding
<b>Fidelity Study</b>				
Appendix A3: Provider Questionnaire	2,000 school prevention providers	Fall 2009	Web-based survey with telephone followup; 30 minutes	Quality of implementation of research-based prevention programs (content, methods, technical quality, extent of use, degree of student exposure); factors associated with quality of implementation of research-based programs (e.g., provider characteristics)
Appendix A4: Program Developer Protocol	Approximately 25 program developers	Fall 2009	Telephone interviews; 45 minutes	Quality of implementation of research-based programs required (content, methods, technical quality, extent of use, degree of student exposure)



## **Instruments for the Fidelity Study**

The Fidelity Study will only be conducted in those schools that are found to have research-based programs based on the results of the Prevalence Study. The respondents for the study are school staff in the schools who are most knowledgeable about specific curriculum prevention programs in the school. In addition, developers of the research-based prevention programs will be interviewed. The instruments for this study component are as follows. (See Appendices A-3 and A-4 for copies of the instruments.)

- Provider Questionnaire (one per school), and
- Program Developer Protocol (one per program).

All instruments to be used for this study are shown in Table 2, with the maximum number of respondents, the data collection period, and the topics covered by that instrument.

### **A.2. Purposes and Uses of the Data**

The purpose of the study is to provide information on the extent to which the SDFSCA Program is funding research-based programs for youth ATOD use and school crime prevention programs. After determining the proportion of schools implementing research-based programs, this study will examine the fidelity of the implementation of programming supported by SDFSCA funds.

### **A.3. Improved Information Technology**

We expect that most potential respondents have access to computers and are comfortable participating in surveys via the Internet. For that reason and given the large numbers of respondents expected, we anticipate using web-survey technology for each of the three survey instruments: Prevalence Questionnaire, District Questionnaire, and Provider Questionnaire. (Potential respondents who lack access to or prefer not to respond via computers may complete and return paper versions of the instruments.) However, the small number of program developer respondents expected does not warrant using web-survey technology to gather information from them; hence, interviewers will use a paper version of the Program Developer Protocol.

#### **A.4. Efforts to Identify Duplication**

This study is part of ED's comprehensive plan for evaluating the effectiveness of the SDFSCA program. The study has been designed specifically to address the gaps in the available information regarding the quality of school-level programming supported by SDFSCA funds at the district and school levels. The previous study on the prevalence and quality of implementation of research-based programs (Study of the Implementation of Research-Based Programs to Prevent Youth Substance Abuse and School Crime) provided baseline data on these issues; the proposed study will provide follow-up data on the same issues. A review of literature indicates that no other research or evaluation efforts have been undertaken.

#### **A.5. Methods Used to Minimize Burden on Small Entities**

Burden is minimized for all survey respondents in districts and schools by keeping the questionnaires relatively short (approximately 30 minutes completion time) and straightforward, restricting questions to generally available information, and limiting the number of open-ended responses. At each school, attempts will be made to avoid asking any one person will to complete more than two questionnaires, for a total burden of approximately 60 minutes. Alternate contacts will be used as much as possible for questionnaires on additional programs at the school. Additionally, no principal will be asked to complete any questionnaire unless he or she has specifically asked to be the person to provide information about a particular program and is not willing to designate anyone else.

Burden is minimized for the program developers by keeping the protocol relatively short (approximately 45 minutes completion time) and straightforward. For example, the interviewer will permit the respondent to direct the flow of the open-ended questions; this approach will make the task simpler for the respondents and reduce the time required to complete the interview.

#### **A.6. Consequences of Less Frequent Collection**

This study is authorized by Title IV of the ESEA.. Under Section 4121, the Act permits a national evaluation of drug- and violence-prevention programming and provides funds for that purpose. If this study is not conducted, ED will be severely hampered in its efforts to build upon previously collected data in order to address important remaining programmatic issues (i.e., the quality of youth ATOD use and school crime prevention programs in schools). Without the addition of evaluative data to

the previously collected descriptive data, ED will have difficulty fulfilling its mandate to support relevant and effective prevention activities; it also will be unable to provide follow-up data for the SDFSCA Program GPRA/PART measures.

**A.7. Special Circumstances for Data Collection**

Data collection will be conducted in a manner consistent with all guidelines described in 5 CFR 1320.

**A.8. Compliance with 5 CFR 1320.8 and Consultations**

**A.8.1. Compliance with 5 CFR 1320.8**

The 60-day Federal Register notice for the study was published on November 26, 2008 (Volume 73, Number 229, page 72035). ED received no comments during the public comment period.

**A.8.2. Consultations**

Consultation on the design of the study and on sampling issues has been provided on this study. The two groups of consultations are identified as follows.

## **Consultation on Sampling**

Consultation on sampling issues has been gathered from the following statisticians:

- Adam Chu  
Westat  
1650 Research Boulevard, RE 442  
Rockville, MD 20850  
(301) 251-4326
- Ralph DiGaetano  
Westat  
1650 Research Boulevard, RE 490  
Rockville, MD 20850  
(301) 294-2062
- Pam Broene  
Westat  
1650 Research Boulevard, RE 484  
Rockville, MD 20850  
(301) 294-3817

## **Consultation on Study and Questionnaire Design**

The Technical Work Group (TWG), which met on November 18, 2008, provided consultation on the study and questionnaire design. The names, affiliations, contact information, and areas of expertise of the TWG members are as follows.

- Pierre Foy  
Lynch School of Education  
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(919) 660-3167  
Area of expertise: Systematic review/meta-analysis

**A.9. Payment of Stipends to Participants**

No stipends are offered for school staff for this study.

**A.10. Assurance of Confidentiality**

Data results from this study will be presented in aggregate statistical form only. School identifiers are collected, but no data will be released with individual identifiers attached, nor will names of individuals or schools be used in any reports. A privacy statement is included in all cover letters accompanying the questionnaires and on the instruction page in each questionnaire. This statement reads:

Responses to this data collection will be used only for statistical purposes. Reports prepared for this study will summarize findings across the sample and will not associate responses with a specific district, school, or individual.

Information that identifies the district, school, or respondent will not be provided to anyone, except as required by law.

For the Prevalence Questionnaire, we will add the following caveat to the end of this statement:

One exception is that school districts will be provided a list of prevention programs identified by their schools as operating during the 2008-09 school year.

We will request that respondents provide their names and contact information as this information is crucial to the success of the data retrieval process (to collect missing information and clarify responses) conducted after receipt of questionnaires from respondents. All personnel working on the study will be required to sign the contractor's confidentiality pledge (see Exhibit 1).

The contractor's Institutional Review Board (IRB) reviewed this study. This IRB found that the study was exempt from the scope of the human subjects regulations under 45 CFR 46.101 (b)(5) for public service programs, as the study focuses on the agency and not the characteristics or opinions of the study subjects.

**A.11. Justification for Questions of a Sensitive Nature**

Questions included in the instruments for this study are not considered sensitive.

## Exhibit 1. Westat confidentiality pledge

**WESTAT, INC.**  
**EMPLOYEE OR CONTRACTOR'S ASSURANCE OF CONFIDENTIALITY**  
**OF SURVEY DATA**

### Statement of Policy

Westat is firmly committed to the principle that the confidentiality of individual data obtained through Westat surveys must be protected. This principle holds whether or not any specific guarantee of confidentiality was given at time of interview (or self-response), or whether or not there are specific contractual obligations to the client. When guarantees have been given or contractual obligations regarding confidentiality have been entered into, they may impose additional requirements which are to be adhered to strictly.

### Procedures for Maintaining Confidentiality

1. All Westat employees and field workers shall sign this assurance of confidentiality. This assurance may be superseded by another assurance for a particular project.

2. Field workers shall keep completely confidential the names of respondents, all information or opinions collected in the course of interviews, and any information about respondents learned incidentally during field work. Field workers shall exercise reasonable caution to prevent access by others to survey data in their possession.

3. Unless specifically instructed otherwise for a particular project, any employee or field worker, upon encountering a respondent or information pertaining to a respondent that she/he knows personally, shall immediately terminate the activity and contact her/his supervisor for instructions.

4. Survey data containing personal identifiers in Westat offices shall be kept in a locked container or a located room when not being used each working day in routine survey activities. Reasonable caution shall be exercised in limiting access to survey data to only those persons who are working on the specific project and who have been instructed in the applicable confidentiality requirements for the project.

5. Ordinarily, serial numbers shall be assigned to respondents prior to creating a machine-processible record and identifiers such as name, address, and Social Security number shall not, ordinarily, be a part of the machine record. When identifiers are part of the machine data record, Westat's Manager of Data Processing shall be responsible for determining adequate confidentiality measures in consultation with the project director. When a separate file is set up containing identifiers or linkage information which could be used to identify data records, this separate file shall be kept locked up when not actually being used each day in routine survey activities.

6. When records with identifiers are to be transmitted to another party, such as for keypunching or key taping, the other party shall be informed of these procedures and shall sign an Assurance of Confidentiality form.

7. Each project director shall be responsible for ensuring that all personnel and contractors involved in handling survey data on a project are instructed in these procedures, have signed this pledge and comply with these procedures throughout the period of survey performance. When there are specific contractual obligations to the client regarding confidentiality, the project director shall develop additional procedures to comply with these obligations and shall instruct field staff, clerical staff, consultants, and any other persons who work on the project in these additional procedures. At the end of the period of survey performance, the project director shall arrange for proper storage or disposition of survey data, including any particular contractual requirements for storage or disposition. When required to turn over survey data to our clients, we must provide proper safeguards to ensure confidentiality up to the time of delivery.

8. Project directors shall ensure that survey practices adhere to the provisions of the U.S. Privacy Act of 1974 with regard to surveys of individuals for the Federal Government. Project directors must ensure that procedures are established in each survey to inform each respondent of the authority for the survey, the purpose and use of the survey, the voluntary nature of the survey (where applicable) and the effects on the respondents, if any, of not responding.

### PLEDGE

I hereby certify that I have carefully read and will cooperate fully with the above procedures. I will keep completely confidential all information arising from surveys concerning individual respondents to which I gain access. I will not discuss, disclose, disseminate, or provide access to survey data and identifiers except as authorized by Westat. In addition, I will comply with any additional procedures established by Westat for a particular contract. I will devote my best efforts to ensure that there is compliance with the required procedures by personnel whom I supervise. I understand that violation of this pledge is sufficient grounds for disciplinary action, including dismissal. I also understand that violation of the privacy rights of individuals through such unauthorized discussion, disclosure, dissemination, or access may make me subject to criminal or civil penalties. I give my personal pledge that I shall abide by this assurance of confidentiality.

Signature \_\_\_\_\_

Date \_\_\_\_\_

**A.12. Estimates of Burden Hours**

Table 3 presents Westat’s estimates of the annual response burden for the Study of Implementation of the Safe and Drug-Free Schools and Communities Act Program State Grants.

**A.13. Estimates of Annual Cost Burden to Respondents**

This study will not require respondents to record and maintain additional data outside their current requirements. Hence, no additional hour burden on the part of school personnel will be required. No equipment costs will be incurred by participating schools as a result of this study.

**Table 3. Estimates of annual response burden**

Instrument	Number of responses	Length of instrument	Frequency	Total burden	Hourly rate	Total cost
<b>Prevalence Study</b>						
Prevalence Questionnaire	6,000	30 min.	1	3,000 hrs.	\$75	\$225,000
District Questionnaire	3,800	30 min.	1	1,900 hrs.	\$75	\$142,500
<b>Fidelity Study</b>						
Provider Questionnaire	2,000	30 min.	1	1,000 hrs.	\$30	\$30,000
Program Developer Protocol	25	45 min.	1	19 hrs.	\$75	\$1,425
<b>Total (for all Prevalence and Fidelity Study questionnaires)</b>	11,825	N/A	N/A	5,919 hrs.	N/A	\$398,925

**A.14. Estimates of Annualized Cost to the Federal Government**

The full study is estimated to cost the federal government \$2.4 million for contractual services, over 2 years. Hence, the annualized cost related to data collection, data analysis, and reporting is \$1.2 million. These costs include personnel, benefits, overhead, supplies, and indirect costs. The estimate is based on expected time to produce, train on, and administer the instruments, and to analyze and report the data. These estimates are grounded in Westat’s previous experience managing data collection efforts of this type.



### **A.15. Changes in Burden**

This request is a reinstatement with change of a previously approved collection for which approval has expired (OMB #1875-0216). Three of the four instruments are shorter versions of those previously approved. The fourth instrument (Program Developer Protocol) is new; it adds very little to the overall burden, because it will be used with only approximately 25 respondents. The change in burden is summarized in Table 3.

### **A.16. Publication Plans and Time Schedule**

In this section, we summarize the time schedule for data collection, and our analysis plans for the study.

#### **A.16.1. Time Schedule**

Data collection for the Prevalence Study—which includes the Prevalence Survey and District Survey—is scheduled for spring 2009, after OMB approval is received (see Table 4). Sample selection and recruitment for these surveys will occur during winter 2009. Results from the Prevalence Study will be used to select schools and programs for the Fidelity Study.

#### **A.16.2. Data Analysis Plans**

For the analysis of survey data, four types of analytic techniques will be employed: (a) data reduction techniques (e.g., composite/scale score building); (b) psychometric analysis (e.g., reliability and validity analysis); (c) descriptive statistics (e.g., measures of central tendency, dispersion, maximum and minimum values, and frequencies); and (d) inferential statistics (e.g., cross-tabulations, *t*-tests, and regression analyses). In this section, the techniques and relevant examples are presented for the study questions.

**Data Reduction Techniques.** The first step in conducting the data analysis for the current study will be to review the data for variables that need to be combined to simplify the analysis and enhance the psychometric properties of the measures. Data reduction will be based on the techniques used in earlier studies, in which the variable of the same underlying construct are then combined into

smaller components (i.e., scales or composite measures). These components will link directly to the domains in our conceptual framework (see Figure 1).

**Table 4. Anticipated project schedule**

Task	2008	2009	2010
<b>Identification Study</b>			
Begin systematic reviews	October		
Initial findings on systematic reviews		July	
Begin meta-analysis		March	
Initial findings on meta-analysis		July	
Final report on systematic reviews, meta-analysis*		November	
<b>Prevalence Study</b>			
Notify districts and schools		January, February	
Prepare forms for data collection		February, March	
Begin data collection		March	
End data collection		September	
Initial findings		October	
Final study report*			July
Deliver data files			August
<b>Fidelity Study</b>			
Begin data collection		September	
End data collection			February
Initial findings			February
Final study report*			July
Deliver data files			August

\*Two final reports will be issued, one on the systematic reviews and meta-analysis and one on the Prevalence Study and Fidelity Study.

The composite measures will be made up of several different questions from a specific questionnaire and will usually possess higher reliability and validity than single questionnaire items. Combining related variables can greatly facilitate data analysis and the interpretation of the results. As an example, several separate survey questions to measure quality of training are combined into one composite measure, the Quality of Training scale. Each respondent will then have a Quality of Training score.

In some cases, not all of the items measuring the same construct (e.g., quality of training) will share an adequate amount of variance. Items that do not share variance with the other items measuring quality of training will not be used in the composite score because they either contribute insignificant amounts of information and/or have low construct validity.

**Psychometric Analysis.** Psychometric analysis will be performed next to determine the reliability and validity of the measures. Internal consistency measures such as Cronbach's alpha and/or split-half correlations will be examined to determine the reliability of the measures.

Valid composite measures are those that measure what they are supposed to measure. Convergent and discriminant validity will be emphasized for this study. Convergent validity involves examining the relationship between measures that should be related to one another, while discriminant validity involves examining the relationship between two measures that should not be related to one another. To conduct this type of analysis, we will construct and examine correlation matrices for the relevant measures.

The final report for the national surveys will include a table showing the composite measures and the questionnaire items that make up each measure, and the reliability and validity of the items. Single item indicators will also be shown in this list of measures. Composite measures found to have poor psychometric (reliability and validity) properties will not be used in the descriptive or inferential data analysis. This step will require reevaluation of the variables included in the domains identified in the conceptual framework. Some variables may have to be reconstructed or eliminated.

**Descriptive Statistics.** Descriptive statistics of composite and/or scale scores, which will be employed to describe characteristics of the prevention activities, schools, and the districts, are useful for answering questions regarding ranges of values, averages, counts, and percentages. These statistics include frequencies and measures of central tendency (such as the mean or median) for individual questionnaire items and composite scores. The descriptive statistics will also be broken down by school level, urbanicity, and SDFSCA funds; district/school size; and other variables important to the study.

Other statistics that will be produced for both individual items (when appropriate) and composite measures include the standard error and minimum and maximum values.

An example of the descriptive statistics that we will use pertains to measuring the fidelity of implementation of research-based programs. For each specific research-based program (e.g., Life Skills Training), we plan to compare the developer's specifications for implementing the program against the survey findings on that program. For example, we might report the developer's requirement for number of sessions implemented and the mean number of sessions actually implemented based on the Fidelity Study. This analysis would indicate the extent to which the programs were implemented as intended by the developers who created them.

**Inferential Statistics.** Statistics calculated to determine whether a statistical relationship has occurred by chance are called inferential statistics. While some of the study questions are easily answered using descriptive statistics, others can only be answered using inferential statistics. These types of statistics vary in complexity, with cross-tabulations representing the simplest type and multiple regressions representing the more complex. The type of inferential statistic used will depend on the study question and the type of data.

An example of the inferential statistics that we will use continues the example on measuring the fidelity of implementation of research-based programs. We could go one step further to examine the extent to which the mean number of sessions implemented differs by district or school characteristics. In this case, we could compare the means between two groups (e.g., middle and high schools) using  $t$  statistics or compare the means among several groups (e.g., urban, suburban, and rural schools) using  $F$  statistics. We also are likely to develop multivariate models that consider the relationship between a measure of fidelity of implementation and several independent variables, including school characteristics and the "predictors of program quality" that we highlight in our conceptual framework. By examining inferential statistics for the individual independent variables, we will be able to gauge their relative strength of association with the measure of fidelity.

When possible, a straightforward approach such as cross-tabulations will be used to address study questions rather than a more complicated technique, since results from the former are often easier to understand and communicate. Using data developed through these different types of analysis, we will prepare draft, interim, and final reports.

**A.17. Approval Not to Display Expiration Date for OMB Approval**

This section is not applicable to the current study. The expiration date for OMB will be displayed on all survey instruments.

**A.18. Adherence to the Guidelines in 5 CFR 1320.9**

No exceptions to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-1 are requested.