

**Evaluation of Response to Intervention Practices for
Elementary School Reading**

**Supporting Statement for OMB Site Recruitment
Clearance Request**

Part A

January 29, 2010

PART A

JUSTIFICATION

The National Center for Education Evaluation (NCEE) of the Institute of Education Sciences (IES), U. S. Department of Education (ED) is conducting the National Assessment of the Individuals with Disabilities Education Improvement Act of 2004 (IDEA 2004, P.L. 108-446), part of which includes an Evaluation of Response to Intervention (RtI) practices in elementary school reading. Under certain conditions,¹ RtI may qualify as an early intervening service (EIS) that may be supported with IDEA funds to identify and serve students in general education classrooms who may be at risk for academic difficulties and eligible for special education. IES has contracted with MDRC, SRI International, and RG Research Group to conduct the Evaluation of RtI Practices in Reading project

This section provides supporting statements for each of the eighteen points outlined in Part A of the OMB guidelines for the collection of information for the RtI project. This submission seeks clearance for the site recruitment materials.

A subsequent OMB package will seek approval for instruments to collect data for an in-depth study of RtI design, implementation, and impact in sites operating mature RtI programs. This will involve data collection from principals, teachers, and students and collection of existing records on student academic performance.

A1. 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.

The focus of the Individuals with Disabilities Education Act (IDEA) has evolved from securing access to public education for students with disabilities to including them in accountability systems, providing access to the general education curriculum, and improving their academic performance. Although there is evidence of progress on some of these goals, students with disabilities continue to display a pattern of low academic achievement, despite advances in curriculum design, understanding of the components required to develop reading skills, assessments to inform instructional decisions, and research-based intervention practices. Further, the diagnostic procedures for identifying and referring students with learning disabilities (LD) for special education services have traditionally been based on the existence of significant discrepancy between the child's IQ and achievement level, resulting in delays in LD students receiving supplemental instruction until the later grades and hence causing them to fall even further behind in school. This conundrum, along with the hope of avoiding unnecessary referrals for special education services, has sparked an impetus for earlier intervening services to improve the achievement of struggling learners and to inform evaluations of whether students have specific learning disabilities (SLD).

Reflecting research which suggests that low achievement may be due to inappropriate instruction and not necessarily to a disability,² several model programs, assessment methodologies, and instructional advances have been developed and have come to be known as Response to Intervention (RtI).³ Generally,

¹ Knudsen, W.E. (2008).

² National Academy of Sciences, Donovan and Cross (2002).

³Fuchs, D. & Fuchs, L. (2006).

RtI practices emphasize high-quality instruction in general education classes, frequent measurement of student progress, decision rules to identify nonresponders, and delivery of increasingly intensive interventions to nonresponders in a tiered fashion. Since the inclusion of RtI in IDEA 2004, the number of RtI initiatives across the nation has grown. As more states and local education agencies seek to adopt RtI initiatives, they need evaluation findings to make sound decisions about appropriate instructional interventions. Thus, the Evaluation of RtI Practices for Elementary School Reading is particularly timely.

The goal of this study is to identify schools operating mature RtI models for elementary level reading, describe their design and implementation, and – where feasible – conduct quasi-experimental analyses of the impact of RtI practices on student academic outcomes and identification for special education. IES seeks approval for the data collection activities described in this request in order to support the site recruitment for the Evaluation of RtI Practices in Elementary School Reading.

Legal or Administrative Requirements that Necessitate the Collection

This evaluation is part of the National Assessment of the Individuals with Disabilities Education Improvement Act of 2004 (IDEA 2004, P.L. 108-446) being conducted by IES. Section 664 of IDEA 2004 requires the National Assessment to evaluate “the implementation of programs assisted under this title and the impact of such programs on... improving the academic achievement of children with disabilities to enable the children to reach ... challenging State academic content standards based on State academic assessments.” MDRC is undertaking the collection of information at the discretion of IES for this evaluation.

Study Objectives

The RtI approach has the potential to:

- (1) improve instruction for all struggling students by identifying learning problems early and informing instructional decisions regarding the type, intensity, and duration of interventions to address them;
- (2) inform the evaluation of students for specific learning disabilities by assessing their responses to research-based interventions; and
- (3) affect the representation of students from culturally and linguistically diverse backgrounds in some disability categories by identifying and intervening early with students who have achievement deficits.

As the study has progressed, it has become clear that there is intense interest in RtI for elementary school reading. To date, 42 states have indicated that they have a state RtI framework in place (retrieved December 22, 2009, from <http://state.rti4success.org/>). Many districts and schools are working to put in place strong RtI models, and investigation of various types of mature RtI practices along with a quasi-experimental analyses of their impacts can help school, district, and state administrators design and implement these programs and inform Federal efforts to support RtI and related early intervening services.

Thus, this evaluation will address the following questions:

- 1. What are the characteristics of mature RtI implementation for elementary school reading? What is the range of practices in terms of universal screening and progress monitoring, the nature of the reading interventions provided, and school-wide coordination?**
- 2. How do these RtI practices compare with those in other, demographically comparable schools in the districts that are not considered to be mature or sophisticated implementers of RtI practices in reading in K-5?**
- 3. What are the impacts of mature RtI practices on student outcomes such as reading achievement, grade promotion, and rates of referral for evaluation for special education and eligibility determinations for special education? What are impacts for key subgroups of students?**

In order to answer the third research question listed above, the study team is pursuing two types of quasi-experimental impact analysis: a comparative interrupted time series (CITS) analysis and a regression discontinuity design (RDD) analysis. These two analytic designs would address slightly different variants of the RtI impact research question. The CITS analysis would examine whether implementation of RtI practices leads to greater improvements over prior academic trends between mature RtI schools and less-mature comparison RtI schools. In contrast, the RDD analysis would examine the impacts of providing more intensive reading support to children on the margin of needing such assistance. In sites where decisions about providing assistance are made based on a ranking of students need for assistance and a consistently applied cutoff for assistance, RDD impact estimates would be calculated by comparing student academic outcomes for children above and below the cutoff point. This analysis would provide evidence on the effectiveness of providing coordinated early intervention services (CEIS) funded under IDEA to students who are at the time not identified as needing special education services but are struggling learning to read and are receiving differentiated instructional supports for reading in the regular education classroom.⁴

The recruitment-related data collection proposed in this submission is intended to learn more about current RtI practices and to help identify the most promising and significant RtI-related practices, perhaps that operate together to form varying types of RtI models. The combination of the descriptive analysis of RtI practices (answering the first and second research questions listed above) and the quasi-experimental analysis of RtI impacts on student outcomes (answering question three) will provide information that policymakers and school administrators can use to help them design RtI models to identify and intervene early with struggling readers, and when needed, determine students' eligibility for special education.

A2. 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 received from the current collection.

The purpose of the data collection is to identify and recruit schools and districts for our study of RtI design, implementation, and impacts. The goal of the nomination process is to identify through an impartial method schools implementing “mature” response to intervention (RtI) practices.

⁴ The Office of Special Education Programs recently issued guidance to provide States with information regarding the use of funds provided under Part B of the Individuals with Disabilities Education Act by local educational agencies (LEAs) to develop and implement coordinated early intervening services (CEIS) for students who are currently not identified as needing special education.

The study team has characterized mature RtI schools as those: 1) using RtI practices considered as critical by experts and the literature and 2) implementing RtI practices for at least two years. The literature identifies five core RtI components:⁵

1. Universal screening (benchmarking) administered in reading at least two times a year;
2. At least three levels (tiers) of instruction, comprising a system of increasingly intensive interventions;
3. Monitoring the progress of students who do not meet benchmark;
4. Procedures for presenting data on student reading performance, evaluating student's performance using these data, and making decisions based on these data about students' response to interventions, and
5. Processes for determining eligibility of children for special education services that include data from the students' responsiveness to the intervention(s).

Within the pool of mature sites, the study team will seek schools and districts that have the data needed for a quasi-experimental analysis of RtI impacts. The two analytic designs under consideration – CITS and RDD – present different requirements for the student data systems and RtI practices that must be in place to support the analysis. CITS would require a clearly identifiable starting point for RtI implementation at the RtI schools, state- district- or school-level data on student outcomes using consistent measures that begin prior to the implementation of RtI and continue after its startup, and schools with similar demographic representation not implementing RtI or starting at a later date than the mature school that can serve as comparison schools. The RDD analysis requires data on the RtI schools' ranking of children's need for assistance and the cutoff points used in identifying which students receive more intensive reading assistance, children's actual receipt of such assistance, and measures of student academic outcomes. Thus, the recruitment-related data collection proposed in this submission will provide information on the presence of these conditions in the nominated sites in order to identify subsamples of schools that can be included in one or both of the quasi-experimental analyses of RtI impacts in addition to the analysis of mature RtI design and implementation. (See Appendix 1 for Project Description).

Rationale for Seeking Nominations in States and Regions from National Experts and National Organizations

Nominations of schools will be sought in states and regions that have a history of implementing RtI practices. The regions' and states' RtI histories will be determined in part on the basis of whether states have funded elementary schools to pilot RtI practices and schools that have been doing so for at least two years, excluding a planning year if one was made available to the sites. The presence of pilot sites indicates that some schools may have had sufficient training, guidance, and resources to support mature implementation of the core RtI components.

⁵Fuchs and Fuchs (2001); Gersten, Compton, Connor, Dimino, Linan-Thompson, and Tilly (2008); Haager & Vaughn (2007); Johnson, Mellard, Fuchs, and McKnight (2006); Stecker, Fuchs, and Fuchs (2008)

To date, 14 states⁶ have funded pilots by 2007. In three of the states with RtI pilots (i.e., Florida, Pennsylvania and Washington) evaluations of the pilots are being conducted.⁷ Thus, these 14 states would seem to serve as an initial pool for possible mature RtI implementation sites for the research.

In addition to these states with pilot schools, the existing professional research literature has also identified two organizations – one in a state with a pilot program and one not - as having schools with mature RtI practices in place. Iowa’s Heartland Area Education Agency (AEA) 11 has a lengthy and well-respected history of practice and evaluation activities in RtI, and has implemented its problem solving model across 54 school districts in the area since 1988.⁸ The Heartland Model is the basis for other state models (e.g., North Carolina) and is often referenced as an early example of and current resource for the problem solving process (see Rhode Island Technical Assistance Program website).

Minneapolis City Schools also has a history of implementing a problem solving model. Minneapolis turned to the problem solving model out of concern with using the IQ- achievement discrepancy model to determine special education eligibility for students with learning disabilities and mild mental impairment.⁹ Under Minnesota state rules and regulations, schools were able to seek three-year, renewable waivers to engage in experimental problem solving models between 1993 and 2005. Thus, schools in the Heartland region of Iowa and Minneapolis schools have been implementing the problem-solving model many years before the formal passage of the IDEA.

The experts we consult will also be able to recommend schools outside of this pool of states (in which we expect there will be mature RtI schools) if they can provide a rationale for the school’s strengths or distinctiveness (e.g., the school has implemented its model for 5 or more years or has been frequently visited by administrators and teachers to learn about its RtI approach).

Nomination and Screening Process

The nomination process will result in approximately 40-50 schools that have been screened to confirm their use of the core RtI components specified previously for at least two years. In addition, the school screening process should provide essential information on the presence or absence of the conditions needed for a quasi-experimental analysis of impacts. Three steps are involved in the nomination and screening process.

1. Seek nominations of districts and schools: Contact experts who are knowledgeable about RtI either as researchers or experienced practitioners on the topic. RtI experts will be contacted who represent different stakeholders and perspectives in RtI, including researchers, practitioners, and representatives from organizations supporting RtI activities. A letter and description of the study will be sent to the nominators outlining the purpose of the nomination process and how the information they provide will be used (see Appendix 1 for the study description and Appendix 2 for this letter to experts).

⁶ Alaska, Colorado, Florida, Illinois, Kansas, Michigan, Minnesota, Montana, North Carolina, Oregon, Pennsylvania, Rhode Island, Washington, and West Virginia.

⁷ These states indicated on their web sites that they were supporting an evaluation of the pilot projects but at this point we do not have information on the details of the evaluation. Other states may be evaluating the pilot program, but have not indicated such an activity on their web site.

⁸ Jankowski (2003)

⁹ Marston, Muyskens, Lau, & Canter (2003)

- a. Researchers actively involved in RtI reading will be contacted. Among those to be contacted are Dr. Ed Shapiro, a Lehigh University Professor who leads an OSEP-funded model demonstration grant on progress monitoring and conducts the Pennsylvania state RtI evaluation; Gerry Tindal, a University of Oregon professor who leads an OSEP funded model demonstration grant on progress monitoring; evaluators of state Reading First programs, such as Scott Baker at Eugene Research Institute in Oregon; and the study’s Technical Working Group (TWG) members Carol Connor, Deborah Speece, Donald Compton, Rollanda O’Connor, and Sharon Vaughn, all of whom are nationally recognized researchers in RtI.
 - b. Practitioners who have worked extensively with RtI on the ground level – and whose work is recognized by OSEP and IES – will be contacted, including: Amy Sichel, a member of the current study’s TWG and Superintendent of Abington Schools District in Pennsylvania; Joy Eichelberger, Pennsylvania State RtI Lead; Judy Elliot, a member of the current study’s TWG and Assistant Superintendent to the Long Beach Unified School District in California; David Tilly, who has worked extensively with the Heartland Model and written scholarly papers about the problem solving model (e.g. Tilly, 2007; Tilly, Harken, Robinson, & Kurns, 2008), and Douglas Marston, who has worked with the Minneapolis school district for two decades, leads an OSEP-funded model demonstration grant on progress monitoring, has written several scholarly papers on RtI, and is involved with RtI training (e.g., Marston et al., 2003).
 - c. Representatives from national organizations working to advance the design and implementation of RtI will be contacted:¹⁰ Possibilities include the Council for Exceptional Children (CEC), National Association of State Directors of Special Education (NASDSE), National Center for Learning Disabilities (NCLD), National Center on Response to Intervention/RtI4Success, RTI Action Network, the Office of Special Education Programs (OSEP), and the U.S. Department of Education Regional Resource and Comprehensive Labs, particularly those that have conducted reviews of state RtI activities.¹¹
2. Organize, collect additional information, and prioritize the nominations for further screening.
 - a. The study team will create a list of all the nominated sites, identify the type of nominator (e.g., researcher, practitioner, organization), and tally the number of responses for each site.
 - b. The study team will review web sites for the nominated sites to ascertain school readiness for the study, including: district and school RtI policies and resources, number of elementary schools in the district (potential comparison schools in a CITS analysis), district and school demographics, and availability of longitudinal data (pre and post RtI startup) from standardized tests administered to students in 1st through 5th grades. In grades 1 and 2, we anticipate testing is likely to be short standardized tests of reading skills (often fluency) administered to all 1st and 2nd grade students, and perhaps district-administered tests of broader reading achievement. In grades 3 through 5, where Federal

¹⁰ The list of organizations is drawn from a list of conference attendees at a Department of Education sponsored RtI Coordination meeting in June, 2008.

¹¹Bocala, Mello, Reedy & Lacireno-Paque (2009); Harr-Robins, Shambaugh & Parrish (2009); Sawyer, Holland & Detgen (2008); Stepanek,& Peixotto (2009); Zirkel (2008)

testing requirements apply, we anticipate that there will also be scores from state-wide standardized tests.

- c. For the possible CITS analysis, districts and schools will be prioritized for further screening on the basis of the likely availability of achievement data over time on students in grades 1- 5 and availability of likely comparison schools in the district. For the possible RDD analysis, nominations may include information relevant to the feasibility of conducting this analysis but it is unlikely to be possible to determine the existence of the conditions for the RDD analysis without further screening of sites to learn about their decision-making rules for providing intensive services and the availability of data on student benchmark performance and instructional placement.
3. Further screen nominated sites: Begin with high priority sites and screen them to determine the presence of core RtI components and practices and data for quasi-experimental analyses.
 - a. Initial contact with district staff. Mail letter with study description to the school district RtI coordinators, or appropriate district administrator, to: (1) describe the study; (2) let them know that a school in their district has been identified by experts as a possible study site and that we plan to contact this school; and (3) tell them that we will contact the district for further discussion and more information collection regarding the nominated school and other district schools that may be mature in their implementation of RtI (See Appendix 3).
 - b. Initiate contact with school staff. Research staff will place a call to the school principal, or the appropriate person identified by the principal, to tell them that we sent a letter to the district letting them know that we were going to contact the school, schedule a screening call for identifying the presence of RtI core components, confirming data availability for the quasi-experimental analysis, and ascertaining their interest in participating in the study. The description of the study (Appendix 1) will be sent to the school administrator prior to the scheduled phone call.
 - c. Screen school sites. Using a structured protocol, the study team will conduct screening calls of expert-nominated schools (See Appendix 4a for screening protocol and Appendix 4b for obtaining information on the tests administered by the school to 1st and 2nd graders. This section of data collection will be conducted in the screening call or – if more convenient for school level staff, the spreadsheet be sent to school staff, completed by them, and returned electronically to the study team. Key goals of the call are to determine which of the critical RtI practices are in place and for what length of time, and whether the school has the RtI data needed for quasi-experimental impact analysis.
 - d. Contact the district (see Appendix 5) to gather additional information and to confirm that a school appears promising for participation in the study either as a mature RtI school or a comparison school):
 - i. Confirm that the district would consider the expert-nominated school as mature in its implementation of RtI;
 - ii. Learn whether there are other demographically similar schools in the district that might be possible comparison schools or possible additional mature RtI schools in the CITS analysis; and
 - iii. Learn about school/district use of standardized assessments in grades 1-5. Appendix 5 also includes a brief table in which the respondent can identify the standardized tests administered by the district across all schools.

- e. Screen district-nominated comparison schools and district-nominated mature RtI schools for the CITS analysis.
 - i. Collect basic information from pre-existing data sources (e.g., the U.S. Department of Education’s Common Core of Data) on student body characteristics and trends in student outcomes for other schools that might be possible comparison or additional RtI treatment schools in the district.
 - ii. Contact the district-nominated mature RtI schools using a structured screening protocol to learn about their RtI practices (Appendices 4a-4b).
 - iii. Contact district-nominated potential comparison schools and use a quick screening instrument (Appendix 6) to learn about RtI related practices, timing of implementation, and brief description of the school’s approach for teaching struggling readers – either currently, if the school has not implemented any RtI practices or prior to their implementation of RtI. The goal is to learn whether the school would in fact present a service contrast to mature RtI implementers.
 - iv. If there are insufficient numbers of nominated schools and districts for the study, adjacent districts will be contacted to determine their potential eligibility for the study. An information letter (Appendix 7) will be sent to the appropriate district administrator at the adjacent district that explains the study and indicates our interest in talking with them. Subsequently, a follow up screening call (Appendix 8) will be made to determine whether the adjacent district has schools implementing RtI and the number of years, if any that the schools have been implementing RtI and gauge their interest in participating in the study.

Following this data collection, the study team will assess the possible sites for the study and see if there is a sufficient number of appropriate sites. The team expects to recruit approximately 40-50 RtI schools for the study. It is possible that additional schools will be recruited to be included in the potential CITS or RDD studies, depending upon the analytic design selected and the number of schools in the design study that meet the criteria for inclusion in a quasi-experimental analysis. If insufficient numbers of schools have been confirmed as appropriate for the study design, we will screen additional schools that have been nominated from both experts and the district representatives, and if necessary, contact adjacent districts and schools (See Appendices 7 and 8 for adjacent district information letter and screening protocol).

Once a sufficient number of schools meeting study requirements have been identified, we will recommend to IES a list of schools/districts for inclusion in the study, indicating which can be part of one or both of the quasi-experimental analyses of RtI impacts. Our goal in making these recommendations is to identify a sample of schools and districts with regional diversity and a mix and range of RtI practices that can inform the decisions of schools considering how to implement RtI practices. In collaboration with IES, a final sample of schools will be selected.

A3. 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 will be collected through semi-structured discussions that are not conducive to information technology, such as computerized interviewing. The spreadsheet containing data about school-level testing practices (Appendix 4b) may be completed electronically.

A4. Describe efforts to identify duplication. Show specifically why any similar information already

available cannot be used or modified for use of the purposes described in Item 2 above.

The planned data collection will generate site recruitment data that are unique and necessary for identifying schools where a study of mature RtI practices can be conducted – addressing specifically the research questions the Department of Education identified for this project.

Whenever possible, however, this information collection will build on sources already available. First, we will use state websites and other publicly-available sources of information to identify regions and states with a history of implementing RtI practices. This identification will be based on whether states have funded elementary schools to pilot RtI practices and schools have been doing so for at least two years (or three years if there was an initial planning year). We will also consult existing reports and surveys of state and district supports for implementation of RtI practices, many funded by the Department of Education, to identify states and districts which already have implemented intensive RtI services and thus might be appropriate for the project.¹²

Our experiences recruiting sites for other projects highlight the importance of conducting early outreach to organizations that could help build support for the study and identify appropriate sites. Thus, the study team will contact staff in state education agencies and national professional organizations to alert them to the study, solicit their support for it, learn more about the current and planned status of RtI implementation and to identify schools where “mature” RtI implementation is more likely to be found.

The study team will contact the 14 states funding RtI pilots (by 2007 or earlier) plus the Heartland AEA and Minneapolis, Minnesota, to learn more about their pilots and gather additional recommendations of schools with “mature” RtI. National organizations to be contacted may include the Council for Exceptional Children (CEC), National Association of State Directors of Special Education (NASDSE), National Association of State Title I Directors (NASTID), National Center for Learning Disabilities (NCLD), National Center on Response to Intervention/RtI4Success, the Office of Special Education Programs (OSEP), and a few of the U.S. Department of Education Comprehensive Labs that have conducted studies on RtI. The study team will also gather information about regions and states with a history of RtI implementation from sources such as reports by the Council for Exceptional Children on the status of RtI implementation in states, and policy updates by organizations such as the National Association of State Directors of Special Education and the National Association of School Psychologists.

The study team will also use existing information to facilitate identification of schools with mature RtI practices – reducing the likelihood that schools without mature RtI practices are contacted. After identifying regions and states with a history of RtI implementation, and seeking nominations of schools and districts with mature RtI practices from these areas, the study team will review district and school web sites to ascertain schools’ suitability for the in-depth study. Specifically, the study team will review information about RtI policies and practices, the number of elementary schools in a district, and the availability of longitudinal data from standardized tests administered in the 1st through 5th grades.

Finally, we will use existing data sources to identify potential schools for comparison with the fully mature schools for the CITS analysis within the districts containing nominated sites. For instance, we will use the 2006-07 U.S. Department of Education’s Common Core of Data (CCD) and/or available EdFacts Reporting System data to facilitate identification of demographically similar elementary schools without mature RtI practices that are within the same districts as schools with mature RtI practices.

A5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB

¹² Bocala et. al. (2009); Design of the National Assessment of IDEA (2006); Harr-Robins et. al. (2009); Sawyer et. al. (2008); Stepanek & Peixotto (2009); Zirkel (2008)

Form 83-1), describe any methods used to minimize burden.

Not applicable. No small businesses are expected to be involved.

A6. 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.

The systematic collection and analysis of site recruitment data are required to accomplish the goals of the research project approved by IES. Participation in all data collection activities is voluntary.

Information for site recruitment will be collected using the process described in response to question A2.

From the information collected through these activities, we will identify a sample of schools (and their associated districts) in which mature RtI models are being implemented. We will then re-contact the selected sites and reach agreement about their participation in the study. Once selected, there will be additional data collection as part of the Evaluation of RtI Practices and this will be described in a subsequent OMB submission. All of this activity is needed to recruit schools for this study and will not be repeated.

A7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with Section 1320.5(d)(2) of the Federal regulations:

There are no special circumstances for the proposed data collection.

A8. Federal Register Comments and Persons Consulted Outside of the Agency

A notice about the study will be published in the Federal Register when this package is submitted in order to provide the opportunity for public comment.

In addition, throughout the course of this study, we will draw on the experience and expertise of a technical working group (TWG) that provides a diverse range of experience and perspectives. The TWG is made up of the following individuals:

- Carol Connor, Florida State University
- Donald Compton, Vanderbilt University
- Judy Elliott, Los Angeles Unified School District
- David Francis, University of Houston
- Paul McDermott, University of Pennsylvania
- Rollanda (Randi) O'Connor, University of California-Riverside
- Amy Sichel, Abington School District (Abington, Pennsylvania)
- Jeff Smith, University of Michigan
- Deborah Speece, University of Maryland-College Park
- Sharon Vaughn, University of Texas-Austin

A9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payments to respondents are proposed for this information collection.

A10. Describe any assurances of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The site recruitment data collection materials will not collect information that is considered proprietary or that identifies individual staff or students within schools. The data to be gathered through the site recruitment collection will be used to identify schools with mature RtI practices for inclusion within a study that characterizes variations in schools' RtI models. As noted above, IES will submit a subsequent OMB package to seek approval for field research instruments to investigate RtI implementation in study schools. Responses to data collection will be used only for broadly descriptive and statistical purposes. The reports prepared for the study will summarize findings across the sample and will not associate responses with a specific district or individual. In no instances will the study team provide information that identifies principals, teachers, or students to anyone outside the study team, except as required by law.

A11. 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 of 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.

There are no personally sensitive questions in this data collection.

A12. Provide estimates of the annualized hour burden and costs of information collection.

Participation in all data collection activities is completely voluntary, with no sanctions or penalties being applied for respondents who choose not to provide information or who do not answer specific questions.

The estimated burden on respondents for completing the study's site recruitment data collection is listed in Exhibit A12.1. Respondents will be school district special education staff and elementary school principals or school-level staff identified by principals as being knowledgeable about the schools' RtI practices. Information about the data collection for the full study will be provided in a subsequent OMB clearance package that will include the actual data collection instruments for the Evaluation of RtI Practices for Elementary School Reading.

This proposed information collection does not impose a financial burden on respondents. Respondents will not incur any expenses.

Exhibit A12.1 summarizes reporting burden on respondents to the RtI phone screens and spreadsheet. The annual burden is estimated from the total number of completed discussions and the minutes taken to complete the data collection. Thus, the total burden across all respondents is expected to be 332.5 hours, or \$15,627.50 in monetary cost.¹³

¹³ The dollar value of respondent burden was estimated by using information about school principals' average annual salaries, length of contract year, and average length of workday obtained from the NCES 2007–08 Schools and Staffing Survey and from the National Association of Elementary School Principals. Hourly rates for the district staff (RtI or special education coordinators) were assumed to be similar to those of school principals.

Exhibit A12.1: Site Recruitment Information Collection Activities

Site Recruitment Materials	Number of Respondents	Average Burden Hours per Response	Total Burden Hours	Hourly Rate	Estimated Monetary Cost of Burden
Screening call with principals at <i>expert- or district- nominated</i> RtI schools (Appendix 4a)	170	1	170	\$47	\$7,990
Spreadsheet on 1 st and 2 nd grade testing practices in <i>expert- or district-nominated</i> RtI schools (Appendix 4b)	170	0.25	42.5	\$47	\$1,997.50
Follow-up contact with district staff (Appendix 5)	50	1	50	\$47	\$2,350
Screening call with principals at district nominated RtI comparison schools for the CITS analysis (Appendix 6)	100	0.45	45	\$47	\$2,115
Screening calls with district staff at adjacent districts with potential comparison/RtI schools (Appendix 8)	25	1	25	\$47	\$1,175
Total	345	0.963768	332.5	\$47	\$15,627.50

A13. Describe any other costs to respondents or record keepers.

Not applicable. The recruitment information collection activities do not place any capital cost or cost of maintaining capital requirements on respondents.

A14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expenses that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The estimated cost for the school screening, including the development of the instruments, preparation of the justification package, and the collection of the data is no more than \$500,000 total for a period of about five months.¹⁴

¹⁴ This is an estimated cost for just the site recruitment data collection phase. The subsequent OMB package seeking approval for research-related data collection and instruments will provide information on the cost for those tasks. The total average annual cost of the entire evaluation, excluding contract options, is \$2,646,557 over the 5 years of

A15. Describe any changes in the burden from prior approvals

This submission to OMB is a new request for approval.

A16. 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 the report, publication dates, and other actions.

A16.1 Analysis Plan

Site recruitment is being conducted to select sites for our implementation and impact study of mature RtI models. Our first step is to place phone calls to district and school administrators to gather basic information about the district and school's RtI practices to determine if it is a viable study site. Following each call, the study team will summarize the discussion in writing and make an initial assessment regarding the potential for working further with the school. We will also collect and analyze information on district-wide testing practices based on the short spreadsheets submitted by district administrators.

Information will be added to a tracking sheet that will summarize our proposed selections for IES. Together with IES, we will select the sites for the in-depth study.

A16.2 Time Schedule and Publications

Recruitment will begin in spring of 2010 and continue through the fall of 2010. No specific publications will emerge from this effort.

A17. Describe arrangements for displaying the number provided by OMB and its expiration date.

All instruments for the RtI project will display the expiration date for OMB approval.

A18. Exceptions to Certification Statement

No exceptions are necessary for this information collection.

the study.

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