

**EVALUATION OF THE EDUCATION
FOR HOMELESS CHILDREN AND
YOUTH PROGRAM—SUPPORTING
STATEMENT FOR PAPERWORK REDUCTION**

Part A: Justification

Prepared by:

Policy Studies Associates
1718 Connecticut Ave., NW
Suite 400
Washington, DC 20009

Prepared for:

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

March 29, 2011

Supporting Statement for Paperwork Reduction Act Submissions

Part A. Justification

A.1 Circumstance Requiring Collection of Information

The Education for Homeless Children and Youth (EHCY) Program is authorized by the Elementary and Secondary Education Act (ESEA) of 1965, as amended, Title VII, Subtitle B. The program awards grants to states, which in turn provide subgrants to local education agencies (LEAs) to provide resources to support the unique needs of homeless children and youth, including transportation, nutrition, and maintenance of academic and medical records. An evaluation of the uses and needs of service providers to homeless children and youth has not been conducted since 2002. Therefore, the U.S. Department of Education (ED), Office of the Planning, Evaluation, and Policy Development (OPEPD), Program and Policy Studies Service (PPSS), contracted with Policy Studies Associates (PSA) to evaluate the extent to which ED's EHCY Program is meeting its intended goals of reducing the barriers homeless children face enrolling, attending, and succeeding in school. Currently there is no systematic process in place for EHCY Program grantees to formally report the qualitative and in-depth quantitative data that the evaluation seeks.

The evaluation will provide a comprehensive summary and analysis of activities under the EHCY Program. It addresses research questions in the following areas of program implementation: (1) the collection and use of data on homeless children and youth; (2) the expenditure of EHCY Program funds; (3) the policies and services provided by local education agencies (LEAs) to remove barriers that prevent homeless children and youth from accessing a free, appropriate public education; and (4) the coordination of such efforts at the local level.

States and grantee districts are required to participate under ESEA, Sec. 9304(a)(4).

A.2 Indicate How, by Whom, and for What Purpose the Information is to be Used

The study's analysis will result in a report that is accessible and useful to non-technical audiences of policymakers and practitioners and that will provide a nationwide picture of the federal program's operations as well as implementation in the states and in a nationally representative sample of LEAs.

The primary users of the information collected from this study will be ED, practitioners, and policymakers. Collecting such information will provide information for those administering the EHCY Program at the federal level to guide them in improving the program. The report will also provide an assessment of the nature and success of implementation of the program for EHCY Program administrators and a broader audience of policymakers, researchers, practitioners, and others interested in efforts to remove the barriers to homeless children and youth enrolling in, attending, and succeeding at school.

A.3 Use of Information Technology to Reduce Burden

This project will employ technology through the use of online surveying conducted through *Survey Gizmo*, an online surveying software. An online survey will provide multiple skip patterns that will save respondents time by only presenting them with the questions that are relevant to them. This approach also will minimize data entry error and the need to follow up with respondents. The stored data will be converted to an SPSS database for analysis.

A.4 Avoidance of Duplication

States are required to report basic data on homeless children and youth as part of their Consolidate State Performance Report (CSPR). PSA has reviewed the information available in the CSPR and designed state-and LEA-level surveys that collect more detailed information to elaborate on the quantitative data collected annually in the CSPR.

There is currently no systematic process in place for EHCY Program grantees to formally report the qualitative and in-depth quantitative data that the evaluation seeks. Local evaluations and monitoring activities may be collecting such data but these data collections are not systematic or consistent across all EHCY Program grantees and subgrantees. Thus, there should be no duplication of information collected.

A.5 Methods to Minimize Burden on Small Entities

All entities participating in this data collection effort are either SEAs or LEAs. None are small businesses or organizations.

A.6 Consequences of Not Collecting Information

The evaluation will provide a comprehensive summary and analysis of activities under the EHCY Program. The evaluation will also analyze the expenditure of EHCY Program funds. By studying the collection and use of data, the evaluation will shed light not only on the availability of data for local program improvement but also on data available for measuring program performance. The consequences of not collecting data will result in the lack of information on the program's implementation. Without the data collected as part of this study, ED will be unable to judge how well the program is implemented and how the program may be improved in the future.

A.7 Explain Any Special Circumstances

None of the special circumstances apply to these data collections.

A.8 Consultation Outside the Agency

The evaluation team consulted with staff members from the National Center on Homeless Education (NCHE) when developing the LEA and SEA surveys.

In February 2011 researchers conducted a focus group with 6 state coordinators in order to solicit feedback on the state survey instrument. Focus group participants were asked to comment on the clarity of survey instructions, overarching issues with the surveys, and each individual survey item.

After making revisions to the survey based on feedback from state coordinators, evaluators piloted the LEA survey during the months of March and April with district liaisons identified by ED and NCHE, while the survey was in the first stage of OMB review.

Participants in the survey pilot test were asked to track the time required to complete the survey and respond briefly to several questions related to item clarity and structure. The evaluators debriefed the participants by telephone to learn more about the respondent's comprehension of each item's text, definitions of key terms, precision and completeness of existing response options, and whether important questions are missing. The evaluation team analyzed participant responses item by item in a database and made survey revisions as necessary. They incorporated the revisions into the final draft of the survey.

The 60 day FR notice was published in VOL.76 April 7, 2011, page 19332. No public comments have been received.

A.9 Payments of Gifts

No payments or gifts will be made to state or LEA personnel who cooperate with PSA in the collection of materials for this study.

A.10 Assurances of Confidentiality

PSA research staff will protect the privacy and confidentiality of the survey respondents. The names and any other identifying information about the survey respondents will be kept completely confidential, and omitted when recording information from the surveys. Caution will be exercised in limiting data access to authorized project staff and those who have been instructed in the confidentiality requirements of the study. The data will contain no information that could be used to identify subjects other than that which is publicly available. No individual identifying information will appear in any of our reports.

The electronically stored data will be password protected. Paper data (if any) will be stored under lock and key. In addition, all materials will be stripped of all individually identifiable information to further protect respondent confidentiality.

Responses to the survey will be used for statistical purposes only. The reports prepared for the study will summarize findings across the sample and will not associate responses with a specific state, district, or individual. The evaluator will not provide information that identifies a subject, state, or district to anyone outside the study team, except as required by law.

As a recipient of the grant, the participation of the SEA and LEA's are required under ESEA, Sec. 9304(a)(4)

A.11 Justification of Sensitive Questions

No questions of a sensitive nature will be asked of or about individuals.

A.12 Estimates of Respondent Hour Burden and Annualized Cost

The collection of program information is a one-time data collection activity and requires respondents to gather data known to exist and be readily available. Based on initial pilot testing, it is expected that most respondents to both the state and LEA surveys will require about 35 minutes to gather the necessary data and complete the survey. Actual time required will be highly dependent on the quality of the system that respondents use for record-keeping and archiving. Using a sample of 752 respondents and assuming a 100-percent response rate, the total response burden for respondents is 439 hours. In addition, for those states in which district liaison contact information is not available, PSA will need to contact the state coordinators for this information. It is estimated that 10 to 15 state coordinators will need to be contacted for this purpose and that it will take one hour for the state coordinators to collect the information. The total estimated hour burden for the entire study is 256 respondents and responses and 151 burden hours on an annual basis.

There are no direct monetary costs to respondents for this activity other than the time required to locate, compile, and submit the requested information electronically. If respondents cannot submit electronically, there may be a small cost for either faxing or mailing the information. At an estimated 35 minutes to complete, \$30 per labor hour, an estimated overall 100 percent response rate resulting in 752 submitted surveys, the overall cost burden for information collected through the surveys will be \$13,160. At \$30 an hour for 15 state coordinators contacted the cost will be \$450. The overall cost burden for collecting all information associated with this evaluation is \$13,610.

A.13 Estimates of Annual Cost Burden to Respondents

- (a) There is no total capital or start-up cost component to these data collection activities.
- (b) There is no total operation, maintenance, or purchase cost associated with the evaluation.

A.14 Estimates of Annual Cost Burden to Federal Government

The estimated cost to the Federal government is \$254,756. This is the total already invoiced plus budgeted future costs charged to the government by PSA to prepare for, implement, analyze, and report on the data collection. The annual cost to the Federal government is \$84,919.

A.15 Program Changes in Burden/Cost Estimates

This request is for a new information collection so no changes apply.

A.16 Plans/Schedules for Tabulation and Publication

The report will have two primary purposes. The first purpose is to provide information for those administering the EHCY Program at the federal level to guide them in improving the program. The second purpose is to provide an assessment of the nature and success of implementation of the program for EHCY Program administrators and a broader audience of policymakers, researchers, practitioners, and others interested in efforts to remove the barriers to homeless children and youth enrolling in, attending, and succeeding at school.

The report will use a combination of narrative, tables, and charts to present its findings. It will be divided into five sections and include a stand-alone executive summary. The *first section* will introduce the program, summarize findings from previous evaluations, provide a national and state by state picture of the enrollment of homeless children and youth using CSPR data, and describe the purpose and design of the study. The *second section* will cover how districts and states are identifying the needs of homeless children and youth. The *third section* will address how states and districts are addressing these needs, and the *fourth section* will address the supports that states provide to districts to address these needs. The *final section* will summarize the findings of the current evaluation and place the findings in the context of previous evaluations.

Data collection will begin in September 2011, with respondent follow-up occurring in September and October 2011. The evaluation team will conduct analyses in the fall of 2011 and will work with ED throughout 2012 to develop a final report for publication. The final report is scheduled to be complete in January 2013.

A.17 Expiration Date Omission Approval

Not applicable. All data collection instruments will include the OMB data control number and data collection expiration date.

A.18 Exceptions

Not applicable. No exceptions are requested.