

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

Part A: Justification

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December 7, 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 (districts) 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 data that the evaluation seeks.

The evaluation will provide a comprehensive summary and analysis of activities under the EHCY program. This evaluation will address the following research questions:

1. How Are States Identifying the Needs of Homeless Children and Youth?

1a. What data do states collect on homeless children and youth? How do states verify and maintain the data? How do states use the data?

1b. What do states identify as the most common barriers to homeless children and youth enrolling, attending and succeeding in school?

2. How Are States Addressing the Needs of Homeless Children and Youth?

2a. What are the roles and responsibilities of the state coordinator? Do other state staff have responsibilities for administering the McKinney-Vento Homeless Assistance Act (MVHAA)?

2b. How do states coordinate their efforts to remove barriers for homeless children and youth with Title I, other state agencies, CBOs, health and human service agencies, and legal advocates?

2c. How do states spend the reservation for state-level coordinator activities? How did states allocate McKinney-Vento ARRA funds? How have McKinney-Vento funds been dispersed from the state to the districts? How does the subgranting process differ among states? What percentage of funds are states reserving for themselves?

2d. How do states raise awareness of the needs of homeless children and youth and the legislative requirements of MVHAA?

3. What Supports Do States Provide Districts to Help Them Address the Needs of Homeless Children and Youth?

3a. How do states monitor efforts by the districts to fulfill the requirements of MVHAA? Are there differences in state monitoring of districts receiving MVHAA funds versus districts not receiving funds?

3b. What type of technical assistance (TA) do states provide to assist districts in implementing MVHAA? Are there differences between the TA states provide to districts receiving MVHAA funds and TA provided to districts not receiving funds?

4. How Are Districts Identifying the Needs of Homeless Children and Youth?

4a. What data do districts collect on homeless children and youth? How does the district use the data? How do districts verify and maintain the data?

4b. What do districts identify as the most common barriers to homeless children and youth enrolling, attending, and succeeding in school?

5. How Are Districts Addressing the Needs of Homeless Children and Youth?

5a. What are the roles and responsibilities of the district liaisons? Do other district staff have responsibilities for administering MVHAA?

5b. How do districts coordinate their efforts to remove barriers for homeless children and youth with local agencies such as CBOs, health and human service agencies, and legal advocates?

5c. How are subgrantee districts spending MVHAA funds? Where are the largest allocations of funds going?

5d. How do districts raise awareness of the needs of homeless children and youth and the legislative requirements of MVHAA?

6. What State Support Do Districts Receive to Help Address the Needs of Homeless Children and Youth?

6a. What type of TA do districts need to implement MVHAA? Is the state providing TA that is of use to districts?

1. How Are States Identifying the Needs of Homeless Children and Youth?

1a. What data do states collect on homeless children and youth? How do States verify and maintain the data? How do States use the data?

1b. What do States identify as the most common barriers to homeless children and youth and succeeding in school?

2. How Are States Addressing the Needs of Homeless Children and Youth?

2a. What are the roles and responsibilities of the state coordinator? Do other SEA, staff have responsibilities for administering the McKinney-Vento Homeless Assistance Act (MVHAA)?

2b. How do states spend the reservation for State-level coordinator activities?

- 2c. How do States coordinate their efforts to remove barriers for homeless children and youth with Title I, other state agencies, CBOs, health and human service agencies, and legal advocates?
- 2d. How did SEAs allocate McKinney-Vento ARRA funds?

3. What Supports Do States Provide Districts to Help Them Address the Needs of Homeless Children and Youth?

- 3a. How do states monitor efforts by the districts to fulfill the requirements of MVHAA? Are there differences in state monitoring of districts receiving MVHAA funds versus districts not receiving funds?
- 3b. What kind of technical assistance (TA) do states provide to assist districts in implementing MVHAA? Are there differences between the TA states provide to districts receiving MVHAA funds and TA provided to districts not receiving funds?
- 3c. How have funds been dispersed from the state to the districts? How does the subgranting process differ among states? What percentage of funds are states reserving for themselves?

4. How Are Districts Identifying the Needs of Homeless Children and Youth?

- 4a. What data do districts collect on homeless children and youth? How does the district use the data?

5. How Are Districts Addressing the Needs of Homeless Children and Youth?

- 5a. What are the roles and responsibilities of the district liaisons? Do other district staff have responsibilities for administering MVHAA?
- 5b. How do districts raise awareness of the needs of homeless children and youth and the legislative requirements of MVHAA?
- 5c. What do districts identify as the most common barriers to homeless children and youth enrolling, attending, and succeeding in school?
- 5d. How do districts coordinate their efforts to remove barriers for homeless children and youth with local agencies such as CBOs, health and human service agencies, and legal advocates?
- 5e. How are subgrantee districts spending MVHAA funds? Where are the largest allocations of funds going?

6. What State Support Do Districts Receive to Help Address the Needs of Homeless Children and Youth?

- 6a. What kind of TA do districts need to implement MVHAA? Is the state providing the TA that is of use to districts?

This evaluation will survey state and local administrators [as well as collect extant data](#) to examine how states and districts identify and address the needs of homeless children and youth and the supports states provide to districts to help them identify and address those needs. [In addition, the evaluation will collect data from the Consolidated State Performance Reports \(CSPR\), by state and nationally, on the number of homeless children and youth enrolled in school, where they reside at night, the types of barriers homeless children and youth face in attempting to enroll in, attend,](#)

[and succeed in school, and the number of districts that report these types of enrollment data to the state.](#)

The following discusses the specific approach to conducting research in each of these broad areas.

How are states and districts identifying the needs of homeless children and youth? Before states and districts can address the needs of homeless children and youth, they need a clear awareness of the specific barriers that these children and youth face and the breadth and depth of the problem. The collection, management, and use of quality data is the primary strategy available to states and districts to correctly define the problems confronting homeless children and youth. Accordingly, the surveys will ask state coordinators and district liaisons about the types of data they collect on homeless children and youth, how they collect these data, and how they use these data for purposes beyond basic compliance.

~~The Consolidated State Performance Report (CSPR) will provide data, by state and nationally, on the number of homeless children and youth enrolled in school, where they reside at night, the types of barriers homeless children and youth face in attempting to enroll in, attend, and succeed in school, and the number of districts that report these types of enrollment data to the state.~~

~~The surveys will ask~~

How are states and districts addressing the needs of homeless children and youth? Once states and districts identify the extent and nature of the needs of homeless children and youth, they are required to address these needs. The state coordinator and district liaison are the individuals with primary responsibility for coordinating efforts to address these needs. Among their responsibilities are raising awareness about the educational needs of homeless children and youth, making sure the provisions of MVHAA are followed, and coordinating efforts among different departments, agencies, and organizations to help homeless children and youth attend and succeed in schools. The surveys will ask state coordinators and district liaisons to identify their primary responsibilities, on which they spend the most time, and which they view as most important. The survey will also ask if other State Education Authority (SEA) or district staff regularly assist with administering ECHY. The state survey will ask about the allocation of ARRA funds to districts. The district survey will ask district liaisons about the activities that they have conducted at the district and school level to implement ECHY.

What supports do states provide districts to help them address the needs of homeless children and youth? The role of the state in EHCY is to carry out activities and enact policies and legislation to address the needs of homeless children and youth and to monitor and support districts in their efforts to address the needs of homeless children and youth. The data the state collects through CSPR and other means are one avenue for states to monitor districts; site visits are another. ED's Student Achievement and School Accountability (SASA) reports will provide information on where ED has found shortcomings in states' efforts to monitor districts. The state survey will ask the coordinator about how the state identifies districts to monitor, the mix of site visits and data reviews used to monitor districts, and the frequency of site visits. In addition, because the primary provision of state support to districts is through technical assistance, the state survey will ask what technical assistance the state provides to districts. The district survey will ask about districts' need for technical assistance and the usefulness to ~~t-he~~ district of the technical assistance provided by the state. Finally, the state survey will ask about the subgranting process, the criteria for selecting districts to fund, and how much of the MVHAA funds states reserve for themselves.

What federal support do states and districts need to better administer the McKinney Vento program? The U.S. Department of Education offers states a variety of services and supports to facilitate administration of the McKinney Vento program. The SASA reports, for example, identify the steps states must take to improve implementation of the McKinney-Vento program and thereby better identify and serve the needs of homeless children and youth. The surveys will ask states how, if at all, they use the Student Achievement and School Accountability (SASA) monitoring reports to implement the McKinney-Vento program and the extent to which they find those reports to be useful. In addition, the survey will ask states whether they have encountered any federal barriers to their efforts to administer the McKinney-Vento program.

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

This evaluation will result in a report that is accessible and useful to nontechnical audiences of policymakers and practitioners and will provide a nationwide picture of the federal program's implementation.

The primary users of the information collected from this study will be ED staff, practitioners, and policymakers. This evaluation will provide information to ED staff administering the EHCY program to guide them in improving the program. The evaluation will also provide information on the implementation of the program for EHCY program administrators at the state and local levels 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 district-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 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 districts. 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. If the information is not collected ED staff, practitioners, and policymakers will not have information on how state and districts are identifying the needs of homeless students, how state and districts are addressing the needs of homeless students, and what supports states are providing to districts to help address the needs of homeless students. 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 district 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 district survey during the months of March and April with eight 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 district 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 district'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 the state survey will take about 35 minutes to gather the necessary data and complete the survey and most respondents to the district survey will take about 30 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 52 state respondents and a sample of 501 district respondents and assuming a 100-percent response rate, the total response burden for respondents is 281 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 5 to 10 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 for a response burden of 10 hours. The total estimated hour burden for the entire study is 291 hours or 184 respondents and responses and 97 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 the state survey and 30 minutes to complete the district survey, \$30 per labor hour, an estimated overall 100 percent response rate resulting in 52 state and 501 district submitted surveys, the overall cost burden for information collected through the surveys will be \$8,430. At \$30 an hour for 10 state coordinators contacted the cost will be \$300. The overall cost burden for collecting all information associated with this evaluation is \$8,730.

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.

PSA will create a detailed analysis plan that will include table shells and chart mock-ups designed to address the research questions. Creating the table shells and chart mock-ups will help identify and fine-tune the specific analyses required to address the research questions.

With fully cleaned and weighted data, analysis will proceed, organized around the three research areas: identifying the needs of homeless children and youth, addressing the needs of

homeless children and youth, and providing state support to districts to address the needs of homeless children and youth. Basic frequencies will provide descriptive information on these three areas. As appropriate, PSA will develop scales that combine answers to several questions within each of the three areas of implementation; as a measure of the reliability of such scales, Cronbach's alpha will be computed and reported. Cross-tabulations will reveal differences in implementation associated with such variables as district size and geographic region. For this and other analyses of differences, the appropriate statistical test (e.g., Chi-square, rank sum, or Cramer's V) will be used. Where the questions from the current state survey overlap with the previous two state surveys and where appropriate, PSA will directly compare tabulations across years to determine differences.

How are states and districts identifying the needs of homeless children and youth? Using frequencies, the report will present the type of data states and district collect and the ways states and districts use the data. The report will highlight the use of data for purposes beyond compliance such as program improvement.

The CSPR will provide data from subgrantee districts on the most common barriers that homeless children and youth face and on the policies and services to address them. Descriptive data will show the commonalities and variation across districts.

How are states and districts addressing the needs of homeless children and youth? The report will use descriptive statistics to show which of their responsibilities the state coordinators and district liaisons see as most important, the average time that they spend carrying out these responsibilities, and the competing demands on their time. The analysis will focus on the degree of variation across states and districts.

The report will use state coordinator and district liaison responses to likert scale questions regarding their efforts toward coordination and collaboration. To get a sense of specific examples of coordination and collaboration at the state and district levels, such as cross-training, sharing data, and sharing resources, the report will display frequencies of the state coordinators' and district liaisons' responses. Data collected from the SASA reports will also provide information on the state coordinators' efforts to collaborate with other SEA program offices and state agencies.

What supports does the state provide to districts to help them address the needs of homeless children and youth? Based on data collected from SASA monitoring reports and state surveys, the report will provide descriptive statistics on the ways states monitor (desk reviews versus site visits) district compliance with MVHAA requirements. The state and district surveys will also ask respondents, in the case of the state, about the type of technical assistance provided or, in the case of the district, the usefulness of the technical assistance received. The report will show the percentage of states distributing MVHAA-ARRA funds using a formula compared to those distributing funds using a competitive application process and what percentage of regular and ARRA funds states reserve for themselves

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 January 2012, with respondent follow-up occurring in January and February 2012. The evaluation team will conduct analyses in the spring of 2012 and will work with ED throughout 2012 and early 2013 to develop a final report for publication. The final report is scheduled to be complete in May 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.