

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section¹. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, make note of the sections or changed sections, if applicable.

Collection of information is necessary to fulfill the terms of Solicitation Number ED-ESE-12-R-0102, "Technical Assistance to Promote the Implementation of Re-Engagement Centers for Out-of-School Youth." This project is authorized by Section 1811 of the ESEA (20 U.S.C. 6551) and the Consolidated Appropriations Act of 2012 (Public Law 112-74). This statement supports a new review.

2. 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 information will be used by the Dept. of Education and its contractors to produce and disseminate a resource guide that shall provide detailed guidance to Local Education Agencies (LEAs) and community organizations in establishing and operating re-engagement centers. The information collected will ensure that the guide is thoroughly informed by current practice and up-to-date learning from the field.

The research team (The Millennium Group and Johns Hopkins University Center for Social Organization of Schools) will collect the information during one-day site visits to five re-engagement centers, and conduct 90-minute phone interviews with lead staff from an additional five re-engagement centers. Lead staff from all ten re-engagement centers also will be asked to respond to a one-time email follow-up to address clarifying questions. The information will be coded to discover and identify consistent themes, sub-themes, and key processes that characterize re-engagement centers. Researchers will use the information to refine the structure of the resource guide and enrich its content with description of how different re-engagement sites developed, whom they serve, their core activities, and their reported impact. The team also will summarize the information in the guide through a visually accessible logic model (theory of

¹ Please limit pasted text to no longer than 3 paragraphs.

action) that is simple and easy to understand and outlines the key activities and components that will lead to a successful center.

3. 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 given to using technology to reduce burden.

Except for email follow-up correspondence, all information solicited from individuals and the re-engagement centers will not involve the use of automated or electronic information technology. Researchers have found that site visits, one-on-one interviews, in-person focus groups, etc. provide for a more consistent and reliable collection effort, especially in a small sample as will be recruited for this study. Researchers will use digital recorders to capture information provided by individuals and focus groups during the in-person interviews. Recording reduces burden by providing a complete transcript of each interview, limiting need for follow-up contact with participants to clarify or complete responses. Researchers also will thoroughly scan the websites of each re-engagement center recruited for study to document basic information thereby reducing the amount of time in each interview dedicated to collecting such information.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The research team has formed a Technical Working Group (TWG) of experts on dropout prevention and re-engaging dis-engaged and out-of-school youth. TWG members have provided background materials on the concept of re-engagement centers and basic information on some centers. This information, together with the information research team members will review from center websites prior to data collection will help researchers avoid duplication. Re-engagement is an emergent field of research and development, however, and re-engagement centers are a new type of entity inspired by recent growing awareness of the nation's dropout crisis and efforts to mobilize communities around it. Current information on these entities is too superficial to provide in-depth guidance on establishing and operating re-engagement centers. Further data collection is necessary to develop a resource guide that will be useful to educators and community stakeholders as described in Item 2 above.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.

Some re-engagement centers recruited for this research may be a small business or a small, not-for-profit enterprise (more likely the latter), while others operate as programs within a larger entity (such as an LEA or a college or university). The research team understands that data

collection in service of a broader public good distracts individuals from their everyday activity and that this distraction may be particularly burdensome for small organizations dependent on those individuals for their day-to-day operation. To minimize the burden, researchers are limiting data collection to one-day site visits to five re-engagement centers, and 90-minute phone interviews with lead staff from an additional five re-engagement centers. The one-day site visits will involve sequential interviews with different individuals and groups, hence researchers will not tie up the time of any one staff member for more than 60-90 minutes (interviews during the visit will consist of one 60-90 minute interview with lead staff, a 60-minute focus group interview with other staff, a 45-60 minute focus group interview with youth served by the center, a 60-90 minute focus group interview with key partners, and a 45-60 minute interview with a School/District official(s)). Lead staff from all ten re-engagement centers also will be asked to respond to just one-time email follow-up to address clarifying questions designed to take no more than an additional 15 minutes of their time. To ensure focused and efficient data collection, researchers will be as well-informed as possible about each center prior to the visits and calls, and all interviews will follow formalized protocols. Participation in all interviews will be voluntary and researchers will follow the necessary informed consent procedures as required by and approved for this project through the Johns Hopkins University Institutional Review Board (IRB).

6. 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.

If this one-time data collection is not conducted, federal officials will continue to lack information about what re-engagement centers are, how they operate, how they are situated in the communities and systems in which they operate, how they vary from place-to-place, and how much they cost to run and their impact. Such information is necessary to provide policymakers with guidance on the costs and benefits of this approach and on whether and how to direct federal resources to support its further development.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- *requiring respondents to report information to the agency more often than quarterly;*
- *requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;*
- *requiring respondents to submit more than an original and two copies of any document;*
- *requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;*
- *in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;*

- *requiring the use of a statistical data classification that has not been reviewed and approved by OMB;*
- *that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or*
- *requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.*

There are no special circumstances that would cause an information collection to be conducted in these ways. Information collected from respondents is entirely voluntary, will be collected verbally, during one site visit or phone call with a one-time possible email follow-up. No written response is required and no records are retained by respondents. The project involves no statistical surveys. No personal information will be collected and participants will be invited to read and sign an informed consent indicating their understanding and willingness to participate and ensuring confidentiality. Participants may elect to withdraw at any time. Participants will not be asked to submit trade secrets or any other proprietary or confidential information.

8. *As applicable, state that the Department has published the 60 and 30 Federal Register notices as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.*

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The research team has formed a Technical Working Group (TWG) of experts on dropout prevention and re-engaging dis-engaged and out-of-school youth. TWG consultants are providing background materials on the concept of re-engagement centers and basic information on some centers. They also are reviewing and commenting on the data collection plan and protocol, the format of the resource guide, and on the data elements to be reported therein. Organizations represented by the members of the TWG include: National League of Cities, American Youth Policy Forum, Jobs for the Future, National Youth Employment Coalition, Oakland Unified School District and also include executives with local education funds and

project directors of dropout prevention initiatives. A 60-and-30-day FRN was published with no public comments.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees with meaningful justification.

Participants will receive a small token (e.g. a Johns Hopkins pen) to thank them for their time, but will not be paid or otherwise incentivized to participate to avoid risk of coercion.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.² If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data.

This data collection is not requesting PII, a SORN is not applicable and there are no assurances of confidentiality. Responses to this data collection will be used only for research purposes. The reports prepared for this study will summarize findings across the sample and will not associate responses with a specific district or individual. The contractor will not provide information that identifies a subject or district to anyone outside the study team, except as required by law.

Also, prior to each in-person interview, the lead researcher will provide a brief oral description of the purpose of the research and invite participants to read and sign an informed consent form indicating their understanding and willingness to participate. Participants may elect to withdraw their participation at that time if they do not wish to sign the consent form. Consent procedures will be approved and authorized by the Johns Hopkins University IRB (and by the IRBs or research offices of any LEAs in which participating re-engagement centers reside, as necessary) and consent forms will have the JHU IRB seal.

All interviews will be guided by semi-structured protocols and will be recorded using digital voice recorders. Participants will be made aware of the use of the recorder prior to the start of the interview and the recording will be discontinued at any point during the interview at the interviewee's request. Data files will be transcribed and all data from site visits (including notes, observation forms, and site visit reports) will be housed on a secure server and in locked file cabinets at the Johns Hopkins Center for Social Organization of Schools. Only members of the project research team will have access to the data.

² Requests for this information are in accordance with the following ED and OMB policies: Privacy Act of 1974, OMB Circular A-108 – Privacy Act Implementation – Guidelines and Responsibilities, OMB Circular A-130 Appendix I – Federal Agency Responsibilities for Maintaining Records About Individuals, OMB M-03-22 – OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, OMB M-06-15 – Safeguarding Personally Identifiable Information, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information)

There are no risks to individuals participating in this research beyond those they would encounter in everyday life. Participants' identities will be kept confidential, and data on the re-engagement centers are being collected for descriptive, non-evaluative purposes only. Points of contact at each re-engagement center will have the opportunity to review any descriptive narratives of their center developed for the resource guide prior to publication to ensure accuracy.

11. 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.

No questions of a sensitive nature will be asked.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- *Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in item 12. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.*

Data collection will involve ten (10) not-for-profit institutions (re-engagement centers). We have included a total of 30 minutes for recruitment and limited post work as part of the Project Director interview time. This time is listed as prework. Because these sites were recommended by others in the field and notified of their possible inclusion in advance, we do not anticipate additional recruiting costs.

Throughout the course of the data collection, we expect to interview approximately 95 individuals across these ten sites. In five (5) sites, researchers will visit the re-engagement center site and anticipate the total number of interviewees will not exceed 16 individuals per site, for a total of no more than 80 individuals across the five sites.

In five (5) additional re-engagement centers, data collection will be limited to one-time, 60-90 minute phone calls with 1-3 lead staff representing each center.

In all ten (10) re-engagement centers, lead staff will be invited to respond to a one-time follow up email which should take no more than 15-minutes of additional time.

The anticipated number of interviewees in each interview category and the estimated amount of time for each interview is summarized in the table below:

Interviewee	# per site	Total Possible (individuals)	Length (in min per interview)	Interview Type
Directors – Individuals responsible for implementing re-engagements centers (includes 30 min for pre-work and follow-up)	1-3	15	60 – 120	Site Visit
	1-3	15	60 – 120	Phone
Other – Individuals from the centers who can share information related to the implementation of re-engagement centers	1-2	10	45 – 60	Site Visit
Clients – Individuals served by re-engagement centers	3-5	25	45 – 60	Site Visit
Partners – Individuals from partner or affiliated organizations	1-4	20	60 – 90	Site Visit
District – District and school officials	1-2	10	45 – 60	Site Visit
Totals:		0 individuals	145 Hours	

- *If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent types, IC activity, Respondent and Responses, Hours/Response, and Total Hours)*

The table above indicates hour burden estimates for each form.

- *Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.*

Based on reference tables from salary.com for non-profit program directors, non-profit staff salaries, MSW and education salaries, the following salary ranges were used to inform cost estimates to respondents:

Directors	50,000 – 80,000	annually
Other staff	35,000 – 50,000	annually
Clients	10.00 – 20.00	hourly
Partners	40,000 – 80,000	annually
District	75,000 – 120,000	annually

Using the highest salary for each respondent and assuming 1840 working hours per year, the estimated cost to respondents is as follows.

Interviewee	Frequenc y	# Respondent s	Cost per Responde nt	Total Cost per Responde nt
Project Director Interview Protocol	Once	30	\$87	\$2,610
Other Center Staff	Once	10	\$27	\$270
Youth Client Focus Group Protocol	Once	25	\$20	\$500
Partner Organizations	Once	20	\$65	\$1,300
District/School Official Interview Protocol	Once	10	\$65	\$650
Total Costs				\$5,330

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and

usual business or private practices. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12

Total Annualized Capital/Startup Cost :
Total Annual Costs (O&M) :
Total Annualized Costs Requested : _____

NOT APPLICABLE.

14. 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 expense 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.

\$113,629 is the total cost of this study. This includes ALL data collection activities, including the analysis of the data, training of site visitors, on site data collection, etc. This is a total of 748 federal contractor labor hours that equal \$94,238 in labor costs. These labor costs include 5 senior researchers (averaging \$125/hour loaded rates), 3 research associates (averaging \$69/hr).

There are \$19,291 in travel costs, \$100 in copying and postage to the participating sites. This amounts to the total above of \$113,629. The hours estimates were developed by assessing the level of staff effort needed to collect and analyze the type of data outlined in Question 12. The estimate was further refined by using actual hours that the participating organizations have used conducting similar studies in the past.

15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).

Not applicable. This is a new and one-time data collection.

16. 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 report, publication dates, and other actions.

The research team will analyze transcripts and field notes using an open coding process to discover and identify consistent labels for themes, sub-themes, and key processes that speak directly to the research questions and that appear in common across sites or that differentiate sites in meaningful ways. Researchers will draw out relationships between themes and identify core elements and drivers of reengagement center practice (axial and selective coding). Team members will use the results of the group coding process to: 1) refine the structure and content of the resource guide; 2) draft a logic model for reengagement centers to support the guide (see below); and 3) develop a case memo for each site that was visited to further support the guide through rich description of the site’s development, activities, and reported impact. No complex analytical techniques will be used, only descriptive content analysis. The published guide and related dissemination products will be written to be consistent with established design and format criteria (i.e., requirements explained in professional style manuals, ED publishing guidelines, and the PWS). The team will draw upon lessons learned from prior successful publication experiences.

Time Schedule

Project dates: October 2012 – April 2014 (Option Year 4/28/2014 – 4/27/2015).

Activity	Date
Develop, test, refine data collection protocols	December 2012 – February 2013
Recruit sites for visits and calls	July-September 2013 (to begin within 20 days of OMB and IRB approval)
Conduct site visits to three centers	September-October 2013
Conduct phone interviews with five centers	September -October 2013
Analyze data	October-December 2013
Draft Resource Guide	December 2013-February 2014
Final Resource Guide	April 2014

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Not applicable. We are not seeking this approval.

18. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.

No exceptions are being sought at this time.