

SUPPORTING STATEMENT – PART A

A. JUSTIFICATION

1. Need for the Information Collection

A Resource Management Decision (RMD) CON-015 directs the Undersecretary of Defense for Personnel and Readiness (USD P&R), with participation by the Undersecretary of Defense (Comptroller) and the Director for Cost Analysis and Program Evaluation (CAPE) to conduct a study of the need for the Department of Defense (DoD) to own and operate schools in the United States. The study will evaluate other options (e.g. charter schools) to include identifying which facilities would be candidates for divesture or transfer to an equivalent alternative arrangement.

As a result, the DoD has contracted RAND to conduct a study designed to recommend options that most effectively balance cost and quality considerations for primary and secondary schooling of military dependents on each of the 15 continental United States (CONUS) installations where the Department of Defense currently operates Domestic Dependents Elementary and Secondary Schools (DDESS) or contracts with local educational agencies (LEAs) to operate schools on the installation. (The DoD contract number is W91WAW-12-C-0030)

In order to achieve the goals of the study, RAND will collect qualitative data through interviews with superintendents of LEAs that are adjacent to the installations to examine the feasibility of LEAs operating DDESS schools.

2. Use of the Information

This is a new data collection.

The qualitative data will be collected and analyzed by RAND researchers. RAND will use the qualitative data to assess LEAs capacity in operating DDESS schools, the approach LEAs will adopt if they took this responsibility, and considerations they would need to take into account in planning to educate DDESS students. Through this analysis, RAND will identify whether LEAs operating DDESS schools is a good alternative for each installation.

RAND's analytic work will be used by decision-makers at DoD to decide on whether to continue operating DDESS schools or have other organizations, such as LEAs, to operate the schools.

3. Use of Information Technology

RAND will be conducting face-to-face or telephone individual interviews to collect the data. Information technology will not be used for interview data collection.

4. Non-duplication

There is no duplication of previous or future data collection effort. The data collected for this project is new and specific to the goals of this project.

5. Burden on Small Business

The respondents are superintendents of LEAs. In this context, efforts to minimize any burden imposed by data collection are not applicable.

6. Less Frequent Collection

RAND is collecting data from each LEA superintendent once during the study period; as a result data collection cannot be decreased. Each interview is expected to last approximately 2 hours.

7. Paperwork Reduction Act Guidelines

There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

a. The 60-day notice was published in the Federal Register on December 2, 2013, Vol. 78, No. 231, page 72066. No comments were received.

The 30-day notice was published in the Federal Register on May 29, 2014, Vol. 79, No. 103, page 30829.

b. Because the subject of the data collection is the LEA's response to possible changes in responsibility for the education of military dependents who reside on installations, it is necessary to interact with the LEA leadership. We consulted the reports of four previous studies conducted between 1988 and 2003 to identify possible topics for discussion with superintendents and selected those topics that most closely matched the objectives of this study.

9. Gifts or Payment

No gifts or payments will be provided.

10. Confidentiality

As indicated earlier, RAND researchers will conduct interviews with superintendents that are adjacent to the study installations to obtain information on LEAs capacity to manage DDESS schools. RAND will be reporting this information for each installation separately. Although in their reporting RAND will paraphrase responses and not associate comments with a specific LEA superintendent, because the analysis will be done for each installation separately, readers of

the RAND report may infer which superintendent made a specific comment. Thus, prior to the interview RAND will notify the superintendents about the possibility of being identified through inference, and will also inform them that they can refuse to answer any question and keep some statements confidential. It is important to point out, however, that the questions do not address sensitive topics. As indicated earlier, questions will ask superintendents to provide factual information about their districts' capacity and the approach and considerations they would need to take into account in planning to educate DDESS students.

In addition, to increase confidentiality, LEA superintendent names will not be recorded in the same file as the interview responses (whether recorded by handwriting or direct typing on RAND computer). LEA official names and contact information will be recorded in a separate crosswalk file. A coding system will be used that will enable the RAND researcher to identify the LEA superintendent respondents, without having their names attached to any piece of data. This code will be used in place of personal identifiers on all transcripts. The crosswalk file that links the interview notes to respondents will also have a file access password and be stored on the project leaders' computers, separate from any interview notes. Further, interview notes if handwritten will be hand carried by research staff between meeting locations and the RAND office and kept in locked file cabinets in project staff offices. As soon as practical, project staff will transcribe any handwritten notes into electronic notes and destroy the handwritten notes. The electronic interview notes will be stored on the RAND project team's computers or shared project folder that only RAND project team has access to.

11. Sensitive Questions

The study will not be asking any sensitive questions. Attached is the protocol that includes the questions.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

a. Based on the length of the structured interview instrument and experience with other similar data collection efforts, we estimate that the interviews will last approximately 2 hours for each respondent for a total of 56 labor hours (28*2).

b. Labor Cost of Respondent Burden

b. Provide an estimate of annualized cost to respondents of only the burden hours imposed by the collection. Do not include capital, start-up, contracting out, or operations and maintenance costs. Respondent cost other than burden hour costs should be shown in Item 13 of the Supporting Statement.

We based labor costs on the superintendent's salary survey conducted by AASA, the School Superintendents Association, (available at: <http://www.aasa.org/content.aspx?id=3030>). The most recent published data indicates that the national average superintendent salary was

\$125,096 in the 2007-2008 school year. Allowing a 2 percent annual salary escalation through the current 2013-2014 school year, we estimate current national average at $\$125,096 \times 1.02^6 = \$140,878$. Note, the 2 percent annual escalation is compounded annually so the factor is $1.02^6=1.1261$. The 12.61 percent increase is actually not much different from $2 \times 6=12$ percent without considering compounding.) Based on 2,080 hours in a full work year, hourly labor costs are approximately \$67.73.

There are 28 superintendents targeted for the data collection. At 2 hours each, this represents 56 labor hours. At \$67.73 per hour, the total respondent labor costs are approximately \$3,793.

13. Respondent Costs Other Than Burden Hour Costs

- a. There are no capital and start-up costs for respondents.
- b. There are no operation and maintenance costs for respondents.

14. Cost to the Federal Government

The following labor costs are incurred by the Federal Government annually to collect and process the information collected:

Title	Approximate Man Hours	Cost per hour	Total Annual Costs
GS14 (Research & Evaluation, Policy Analyst, Procurement)	85	\$66.19	\$5626.15
GS15 Staff (Program Manager, Communications, Chief of Staff)	125	\$75.28	\$9410.00
SES (DoDEA Director and Financial Officer)	12	\$85.77	\$1029.24
TOTAL			\$16,065.39

15. Reasons for Change in Burden

- a. This is a new collection.

16. Publication of Results

Data collection is estimated to begin in mid-to late-summer 2014 and take place for approximately 2 months. The report will be completed in December of 2014. The report will be publically released in March of 2015.

17. Non-Display of OMB Expiration Date

We are not requesting non-display of OMB expiration date.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

No exceptions.