September 22, 2014

**U.S. Department of Education**

**PPSS TO 13. High School Reform Study**

**Information Collection**

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**OMB Clearance Package**

PPSS Task Order 13. High School Reform Study

Contract Number GS-10F-0554N, Order # ED-PEP-11-O-0090/TO13  
SRI Project #P21496

**Submitted to:**

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SUPPORTING STATEMENT, PART A  
PAPERWORK REDUCTION ACT SUBMISSION

A. Justification

This request for OMB clearance is to collect data through a nationally representative survey of high schools during the 2014–15 school year. Data from the National High School Reform Study will inform a descriptive report on the strategies that high schools are using to help students graduate from high school, especially students at risk for dropping out and students in high schools with low graduation rates. Information from the survey will fill critical information gaps about the use and prevalence of high school reform strategies to support at-risk youth. SRI International (SRI) and Research Triangle Institute (RTI), under contract with the U.S. Department of Education (the Department), are conducting the research to prepare this report. Pending clearance, the research team will administer a survey to a nationally representative sample of approximately 2,000 public high school administrators.

Introduction

In 2010-11 the overall national graduation rate reached a record high of 80 percent. Although graduation rates have been improving over the past 10 years, a graduation gap persists between white and nonwhite students. Of particular concern are the high school graduation rates for minority students, which fall between 67 percent for Native Americans, 69 percent for Blacks, and 73 percent for Latinos (Stetser & Stillwell, 2014). In addition, students living in poverty are approximately five times more likely to drop out of high school than high-income students (Rumberger, 2013). The impact of not earning a high school degree is far-reaching; high school dropouts are at a disadvantage economically and on other quality of life factors, such as health, life expectancy, and involvement in crime (Amos, 2008).

However, a high school diploma alone is no longer sufficient for achieving the American dream. The rapidly changing conditions in the global economy increasingly demand more education and training than secondary schools can provide, and this demand will increase over time (Carnevale, Smith, & Strohl, 2010). Projections suggest that the economy will create 46.8 million job openings by 2018, and 63 percent of the new and replacement jobs (positions vacated by those who have retired) will require some college or training. To be responsive to these concerns, the current Administration set a goal that every American should complete at least one year of postsecondary education or training. Meeting this goal requires a policy shift from aiming to keep at-risk youth in high school to helping at-risk youth graduate high school and continue their education.

This exploratory study is intended to inform policy related to high school reform and to inform the types of technical assistance and program priorities provided to grantees through the High School Graduation Initiative (HSGI). The HSGI awards discretionary grants to state educational agencies (SEAs) and local educational agencies (LEAs) to support the implementation of effective, sustainable, and coordinated dropout prevention and reentry programs in high schools with annual dropout rates that exceed their state average annual dropout rate. Funds also may be used to support activities at middle schools that feed into high schools which have high dropout rates . Recently President Obama proposed consolidating the HSGI and Advanced Placement programs into a new College Pathways high school program. The following presents an overview of the study design, including the research questions guiding the study, the data collection process, and plans for the final report.

Research Questions

The National High School Reform Study is designed to answer the following questions:

1. What are the prevalence and characteristics of key high school reforms, especially dropout prevention strategies, operating in the nation’s public high schools?
2. What are the prevalence and characteristics of key high school reforms, especially dropout prevention strategies, in the nation’s public high schools with low graduation rates?

Taken together, these research questions aim to provide descriptions of how secondary schools can support at-risk students and potentially provide them with options for postsecondary attainment.

Survey

The Department requests OMB clearance for a survey of 2,088 nationally representative public high schools enrolling 12th-grade students in fall 2014. The study will use a stratified random sample to select high schools to recruit for participation in the survey. The survey will provide data on the prevalence and characteristics of key high school reforms designed to improve high school graduation rates.

A.1. Circumstances Requiring the Collection of Data

Approximately one million students drop out of high school each year, and dropout rates are higher among minority males and students living in poverty. Current high school reform strategies to prevent dropout are diverse in type of program, services offered, frequency, intensity, and duration of contact with target students. Unfortunately, there is a paucity of information on the prevalence of various high school reform strategies and their characteristics. This task order is intended to address this significant knowledge gap. The research literature suggests that it is the combined efforts of strategies at the secondary level that culminate in students’ persistence and completion of high school. As a result, the survey can make an important contribution by capturing information on the complete array of strategies being implemented within a national sample of high schools.

The Department contracted with SRI and RTI to carry out the national *High School Reform Study* (HSRS). The goals of the study are to identify what key high school reforms are in the field, especially in schools with higher than average dropout rates.

The proposed data collection is authorized under Title I-Part H of the *Elementary and Secondary Education Act of 1965 (ESEA)*, as reauthorized by the *No Child Left Behind Act* (Public Law 107-110), 2001.[[1]](#footnote-1)

A.2. Purposes and Use of Data

The Department will use the study results to inform policy related to high school reform, HSGI program priorities, and technical assistance provided to HSGI grantees.

A.3. Use of Information Technology to Reduce Burden

The research team will use information technology to reduce burden on schools in several different ways. School administrators will be asked to complete their surveys via the Internet. An online survey platform allows for automated branching and skip patterns so respondents see only items that are relevant to them based on their preceding responses.

Contractors will follow up with school administrators who do not complete the web-based survey to offer an opportunity to complete the survey via a computer-assisted telephone interview (CATI). Computer-controlled interviewing offers accurate and efficient management of survey activities, including case management, call scheduling, generation of reports on sample disposition, data quality monitoring, interviewer performance, and flow of information between telephone interviewers and other data collection operations.

A.4. Efforts to Identify and Avoid Duplication

The Department will make all efforts to avoid duplicating other federally-funded projects. The leadership team for this study brings past experience producing reports on high school reform strategies. The team has reviewed prior nationally representative surveys in this area and spoken with experts in the field familiar with the extant body of research. The survey will probe into areas of high school reform that have been understudied and will update prior survey research findings.

A.5. Efforts to Minimize Burden on Small Businesses or Other Entities

The research team anticipates no burden on small businesses, as data collection will be limited to public high schools.

A.6. Consequence if the Information Is Not Collected or Collected Less Frequently

If the proposed information is not collected, the federal government will miss the opportunity to provide timely and practical information to school, district, state, and federal personnel on the prevalence and characteristics of key high school reform strategies. Approximately 23,000 schools meet the sampling frame for this study (public high schools serving 12th-graders), which is more than 20 percent of schools listed in the Common Core of Data (CCD). Gathering, synthesizing, and sharing information about high school reform strategies will inform future policy and federal programs that affect these schools.

A.7. Special Circumstances

No special circumstances are anticipated. The data collection will comply with 5 CFR 1320.6.

A.8. Federal Register Comments and Persons Consulted Outside of Agency

1. **Consultation Outside the Agency.** Seven experts (four researchers and three practitioners) have agreed to serve on an expert panel to guide this study. They are listed in Exhibit 1. These experts are providing valuable input on survey content.

Exhibit 1. Expert Panel Members

|  |  |
| --- | --- |
| Name | Professional Affiliation |
| Marisa de la Torre | Consortium on Chicago School Research, University of Chicago |
| Nettie Legters | Center for Social Organization of Schools, Johns Hopkins University |
| Sonia Dinnal | Hartford Public Schools, CT, Project Director for HSGI grant |
| Mindee O’Cummings | American Institutes for Research |
| Becky Youngman | School District of Palm Beach, FL, Manager of College Readiness |
| Debra Sacks | Riverside County Office of Education, CA |
| Melinda Mechur Karp | Community College Research Center, Teachers College |

A.9. Payment to Respondents

No payment to respondents will be offered.

A.10. Assurances of Confidentiality

The research team has established a set of standards and procedures to safeguard the privacy of participants and the confidentiality of data as they are collected, processed, stored, and reported. The following provisions will apply on this project:

* Responses to this data collection will be summarized in an aggregate manner (across groups of schools) or will be used to provide examples of program implementation in a manner that does not associate responses with a specific site or individual.
* The study team may refer to the generic title of an individual (e.g., "school principal”), but no district, school, or individual name will be used. The contractor will not provide information that associates responses or findings with a respondent to anyone outside the study team. In reporting, the study will not disaggregate data to such a degree that it would be possible to identify individual schools or other entities.
* The initial page of the survey will inform participants of the data collection purposes and the potential uses of the data collected. The risks and benefits of participating in this study, which are expected to be nominal, are presented on the cover page of the survey as well (Appendix A).
* The research team will maintain a tracking database with names and contact information for respondents separate from the survey responses. The tracking database will be used for survey administration and follow-up. The research team will assign a unique identification number to each school to be used for raw data, printout listings that display the data, and analysis files. The survey response file will not contain names or addresses, just the unique identification number. The research team will not provide information that associates responses or findings with a subject or school to anyone outside the study team.

As the lead in the data collection for the study, RTI International will have its Institutional Review Board (IRB) review and approve all research protocols and data collection materials. In RTI’s Office for Research Protection, RTI’s IRB is responsible for ensuring that all research protocols are scientifically sound and worthwhile, risks are minimized to the extent possible, subjects are selected in an equitable manner, informed consent is required, privacy and confidentiality are protected, and the study is adequately monitored. The IRB will ensure that this research meets legal and ethical standards and protects the rights of human subjects of research. All invitation letters sent to sample members will include a telephone number to directly contact RTI’s Office for Research Protection. Letters will also include the following statement about the voluntary nature of the survey and assurance of confidentiality:

All responses will be protected from disclosure. No schools or individuals will be identified by name. Participation is voluntary. **The data collected will be used in analyses to understand what services and supports are available through schools, what services and supports are most prevalent across the country, and the nature of participation in these services and supports.** Information collected from school administrators will help to inform and shape efforts to improve the quality of the high school experience, especially for those students at risk for not graduating high school.

A.11. Justification for Questions of a Sensitive Nature

The survey does not include sensitive questions and focuses primarily on descriptions of programs and services offered at a school.

A.12. Estimate of Information Collection Burden

This request relates to a sample of approximately 2,088 surveys of high schools. The research team estimates that the survey will take approximately 30 minutes to complete. With an estimated 2,088 schools in the sample and a 80 percent participation rate (see B.2), the estimated total burden across all respondents is 835 hours for 1,670 respondents.

Using an hourly rate of $52.12 for school principals (based on Bureau of Labor Statistics data from May 2010), the estimated cost per respondent is $26.06. With 1,670 respondents (based on an 80 percent response rate), the total estimated cost of respondents’ time is $43,520.

A.13. Estimate of Cost Burden to Respondents

There is no capital or start-up cost component to these data collection activities, nor is there any total operation, maintenance, or purchase cost associated with the study.

A.14. Estimate of Annualized Costs

The estimated annualized cost to the federal government for data collection activities is $603,353. This is based on the total contract costs of $1,960,898 amortized over a 39-month period. This estimate includes costs already invoiced, plus budgeted future costs that will be charged to the government for the study design, sample selection, and data collection activities.

A.15. Change in Annual Reporting Burden

This is a new study/data collection.

A.16. Plans for Tabulation and Publication of Results

The data collection period will begin on December 1, 2014, pending OMB approval.

Survey sampling will occur before December 1, 2014, so the research team can be ready to launch the survey upon receiving final OMB approval. Letters to the randomly selected sample of 2,088 schools for the survey will be sent out immediately upon receipt of OMB approval. The district letter will include a toll-free phone number that district staff can call to alert project staff if there are requirements to be met prior to contacting schools. One week after the district letters are sent, a letter and study fact sheet will be mailed to the school principal that includes the URL, user ID, and password to access the online survey. The survey will remain open through June 1, 2015. The research team will create a clean data file and dictionary.

Topical reports will be prepared to summarize the current state of high school reform strategies. The reports will include a synthesis of relevant key findings and data tabulations from the survey. These easily accessible written reports will be posted on the Department’s website. The planned release date for the topical reports will be prior to January 2016.

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.

1. http://www2.ed.gov/policy/elsec/leg/esea02/pg15.html#sec1802 [↑](#footnote-ref-1)