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## **Fourth Draft OMB Package, Version Two – Part A Revised**

### **PPSS TO 10: Studies of Rural Education Achievement Program (REAP) Grantees Subtask 3.5: Prepare Fourth Draft OMB Clearance Package**

Contract Number GS-10F-0554N; Order Number ED-PEP-11-O-0090  
SRI Project #P21494

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## SUPPORTING STATEMENT, PART A PAPERWORK REDUCTION ACT SUBMISSION

### A. Justification

This request for OMB review asks for clearance to collect data through surveys and individual interviews that will provide a descriptive report on how grantees and subgrantees of the U.S. Department of Education's (the Department) Rural Education Achievement Program (REAP) experience various aspects of the program, including eligibility, planning, and use of funds, as well as any technical assistance needs regarding both administrative and programmatic issues. SRI International (SRI) and Impaq International, under contract with the Department, are conducting the research to prepare the report. Pending clearance, the research team will administer a survey of a nationally representative sample of the approximately 6,000 total Small, Rural School Achievement (SRSA) grantees and Rural and Low-Income Schools (RLIS) subgrantees, telephone interviews of a purposively selected sample of district administrators in SRSA grantee districts and RLIS subgrantee districts, and telephone interviews of REAP coordinators in all states receiving REAP funds.

#### A.1. Circumstances Requiring the Collection of Data

Rural school districts in the United States face many challenges unique to their circumstances, such as shortages of qualified educators, geographic isolation, limited availability of rigorous classes to prepare students for college (e.g., Advanced Placement and International Baccalaureate), and underdeveloped technology systems. As such, educational approaches that are effective in urban and suburban schools may not be as effective in rural schools. In addition, the increased focus at the federal level on competitive funding, such as the Investing in Innovation (i3) grants puts rural schools at a disadvantage, due to their smaller staff and infrastructure. (Patterson, 2010).

The rural education sector in America is quite large. National Center for Education Statistics (NCES) data show that nearly one-third of all traditional elementary and secondary schools were in rural locations in 2010-11, serving 20 percent of all K-12 students (The Rural School and Community Trust, 2014). Changes in the numbers and types of rural students over the past decade have only served to intensify the challenges of educating these students. Nationwide, rural enrollment increased from school year 1999-2000 through 2008-09 by more than 22 percent, compared to a 1.7 percent enrollment increase among all nonrural districts, with a net national gain of more than 1.7 million rural students for that period (The Rural School and Community Trust, 2012). The same report found that the level of rural student poverty, as measured by eligibility for free or reduced-price meals, also increased over this time period, from 31 to 41 percent, while enrollment of Hispanic students in rural districts increased by 150 percent. For student poverty, this mirrored trends for the nation as a whole, while the increased enrollment for rural Hispanic students outpaced growth in Hispanic student enrollment nationwide.<sup>1</sup>

The Rural Education Achievement Program (REAP), authorized by Title VI, Part B of the *Elementary and Secondary Education Act (ESEA)* of 1965, as amended by the *No Child Left Behind Act* of 2001, was created to help address the special challenges faced by rural school districts. The two REAP programs — the SRSA program and the RLIS program — increase the funding for rural districts to help them effectively serve students in rural settings. An evaluation conducted by the Berkeley Policy Associates (BPA) to examine the implementation of the RLIS program found that rural school districts most often

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<sup>1</sup> The percent of students eligible for free or reduced-price meals increased from 34 to 44 percent (National Center for Education Statistics, 2010) and the percent of Hispanic students increased 36 percent over approximately the same time period (2000-01 to 2008-09) (National Center for Education Statistics, 2012).

used RLIS funds to purchase and use educational technology, offer pay for teachers and persons who provide supplemental services, and find innovative ways to provide professional development to geographically isolated teachers (U.S. Department of Education, 2010). Both state- and district-level respondents in this study reported that they coordinated their efforts with those responsible for implementing Safe and Drug-Free Schools and Communities, 21st Century Community Learning Centers, and other federal education programs (U.S. Department of Education, 2009). A study conducted in 2005–06 of SRSA grantees exercising the REAP Flexibility option focused on how districts used their REAP Flex authority. This study found that approximately half of the eligible SRSA grantee districts used REAP Flexibility. The primary reason for non-participation was a lack of information. Those who did exercise their REAP Flex authority used it to target low-performing student groups, improve technology and teacher quality (U.S. Department of Education, 2007). Unlike the earlier studies, which focused on RLIS subgrantees and SRSA REAP Flex users, respectively, this study will document the practices and strategies of all grantees receiving REAP funding.

More information about how grantees use REAP funds, the challenges associated with using these funds, and districts' technical assistance needs related to the funds will help inform policymakers as they consider the reauthorization of *ESEA* and provide timely and practical information to school and district personnel receiving REAP funds. To collect this information, the Department contracted with SRI to conduct a study, *Study of Rural Education Achievement Program (REAP) Grantees*. The results of the research can be used to inform future policy and federal programs targeted to rural schools and to design technical assistance supports.

This study aims to inform future policy and federal programs targeted at rural schools and to assist in designing future technical assistance. The research is descriptive in nature; it is not a program evaluation and does not purport to assess program outcomes. By surveying a randomly selected representative sample of SRSA grantees and RLIS subgrantees, the study will for the first time offer a comprehensive description of REAP as experienced by its constituents.

The following presents an overview of the study design, beginning with the research questions guiding the study, and then briefly describes the data collection process and plans for the final report

### *Research Questions*

To better understand key program strategies and practices that may help other practitioners and policymakers refine their own programs, the Department established the following research questions to guide the study:

1. What are REAP grantees' experiences of grant eligibility determination? To what extent do districts contact, or are they contacted by, the state regarding eligibility?
2. On what types of activities are REAP funds spent? What are grantees' experiences of deciding how to target funds (e.g., processes and factors, personnel and stakeholders involved, integration in larger spending decisions)? Do districts perceive a need for greater flexibility in the use of federal Title funds? How does this vary by grantee characteristic?
3. How do grantees use REAP funds in combination with other federal program funds? To what extent are other Department or other federal programs (e.g., E-Rate, USDA Rural Development grants) considered or integrated? What are the challenges in spending REAP funds?
4. How many SRSA-eligible grantees use REAP Flexibility? Does the use of Flexibility differ by

grantee characteristics? If Flexibility is not used, why not? Exactly how do SRSA grantees tend to use Flexibility?

5. What are the major challenges and technical assistance needs that REAP grantees face (e.g., eligibility determination and compliance with program requirements or other)? Are there technical assistance needs that grantees perceive to be unaddressed? For what? What is the frequency of technical assistance use by grantees? By whom? For what?
6. Is there anything that districts or states would recommend changing about the REAP program administration or design?

### *Surveys and Phone Interviews*

The Department is requesting OMB clearance for the following two data collection activities: (1) a survey of a nationally representative sample of the approximately 6,000 SRSA grantees and RLIS subgrantees that receive REAP funds in the 2014–15 school year; and (2) telephone interviews with REAP coordinators in all states receiving REAP funds<sup>2</sup> and a sample of 30 district SRSA or RLIS coordinators. The survey and the telephone interviews will provide data in the following areas: (1) how the program functions operationally; (2) how districts are using REAP funds; (3) how districts use REAP program funds in conjunction with other federal program funds; and (4) the major technical assistance needs that districts perceive having related to REAP.

The study will use a stratified random sample to select districts for the surveys and interviews. The survey will provide representative information for all REAP grantees. Since the study includes interviews with REAP coordinators from all states receiving funds, the state coordinator interviews will also provide representative information on the population of state coordinators. As appropriate, the research team will quantify the qualitative data gathered in the state coordinator interviews. The sample of districts selected for the district coordinator interviews will not be large enough for responses to be considered representative of the universe of REAP grantees. Instead, they will provide examples and context to illustrate the survey results.

### *Reporting*

A publicly available report will integrate the results from all data collection activities. It will include descriptive statistics from the survey data about REAP grantee needs and experiences, as well as qualitative data from the state and district coordinator telephone interviews to provide context for the quantitative data through concrete examples of survey findings. The report will also quantify qualitative data from the interviews with state REAP coordinators when this can be done reliably to provide counts of the number of states that have certain practices or procedures or report particular challenges. The Department can use the findings from this study to identify REAP-related practices and policies that might warrant further study and, eventually, further discussion within and among other grantees around the country. The Department can also use this study to identify grantee technical assistance needs. Information about the challenges districts face in using REAP funds, alone or in combination with other funds, will be useful to the Department and to policymakers as they consider reauthorizing ESEA. To be useful to policymakers, the report will need to be practical, user-friendly, and pithy, with highlighted findings, graphics, illustrative quotations, and easily accessible bullets. Finally, this report may be useful to REAP grantees and subgrantees as they plan for the most appropriate ways to use their funds.

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<sup>2</sup> All but two states (Hawaii and Vermont) had districts that received REAP funds in the 2013–14 school year. The research team anticipates that the number of states with REAP districts in 2014–15 will be close to 48.

## **A.2. Purposes and Use of Data**

The study will document and analyze grantee and subgrantee experiences with the REAP program and the various practices funded by REAP — by itself or in combination with other federal funds — as well as how the components of the program work to help address the challenges faced by rural districts. Department staff can use this data to identify implementation challenges and technical assistance needs. A better understanding of REAP grantee and subgrantee needs and experiences will also be useful to policymakers as they consider *ESEA* reauthorization, and to REAP grantees and subgrantees as they plan for the most appropriate ways to use their funds.

## **A.3. Use of Technology to Reduce Burden**

The research team will use information technology to reduce burden on state education agency and school district staff in several different ways.

The research team will communicate with potential survey respondents primarily via email. In addition, the research team will administer the surveys using an online platform that allows for automated branching and skip patterns so respondents only see items that are relevant to them, based on program type and their previous responses.

To schedule telephone interviews, researchers will communicate with state REAP coordinators and district SRSA or RLIS coordinators primarily via email, and will digitally record the interviews. The recordings will reduce errors in field notes by capturing respondents' verbatim responses, thereby minimizing researcher requests for clarifications after the interviews.

## **A.4. Efforts to Identify and Avoid Duplication**

The Department will make all efforts to avoid duplicating other federally funded projects. The proposed study does not duplicate any other federally funded studies, and the Department of Education does not currently have plans to study REAP beyond the current study.

There has been limited research on the administration of REAP grants and how SRSA grantees and RLIS subgrantees experience various aspects of the program, including eligibility, planning, and use of funds, as well as technical assistance needs they may have regarding both administrative and programmatic issues. The last federally funded studies of REAP grantees were conducted in 2005 and 2007–09 (U.S. Department of Education, 2007, 2010) and focused exclusively on the REAP Flex provision and RLIS subgrantees, respectively.

In addition, researchers will work closely with the REAP office to collect any data relevant to the study that may already be submitted to them by the grantees, thereby ensuring that researchers do not duplicate data collection efforts. For example, researchers will sample districts using the grantee data the REAP office posts on its website. These data include average daily attendance (ADA) figures submitted by the states, poverty measures, and information on state rural designations. Researchers will only collect data from states and districts that the REAP office does not collect.

## **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 state and local education agencies.

#### **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 and district personnel and policymakers on the administration of RLIS and SRSA grants, practices funded by REAP alone and in combination with other federal funds, and how the components of the program work to help address the challenges faced by rural districts. Approximately 6,000 school districts received REAP funds through the RLIS and SRSA programs in the 2012–13 school year — more than 40 percent of school districts in the United States. Gathering, synthesizing, and sharing information about grantees' use of funds, their challenges in using funds, and their technical assistance needs will inform future policy and federal programs and assist in designing future technical assistance for these districts.

#### **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**

- a. **Federal Register Announcement.** A 60-day notice to solicit public comments was published in the Federal Register on June 25, 2014 (Volume 79, No. 122, p. 36026-36027). No comments have been received to date.
- b. **Consultation Outside the Agency.** Five national experts, two state coordinators, six district administrators overseeing SRSA or RLIS grants, and one regional education service center coordinator overseeing REAP grant administration have provided expert advice to guide this study (see Exhibit 1). These experts' knowledge of the REAP program has been a valuable resource in developing data collection plans and instruments.

### Exhibit 1. Expert Panel Members

Name	Professional Affiliation
Susan Sheridan	Director, National Center for Research on Rural Education, University of Nebraska, Lincoln
Doug Christensen	Former Nebraska Commissioner of Education
Hobart Harmon	Independent Consultant and Editorial Board Member of the <i>Journal of Research in Rural Education</i>
Julie Bartsch	Rural Faculty, The Rural School and Community Trust
Brenda Williams	Director, Office of Instructional Technology, West Virginia Department of Education
Didi Garcia	Division of Federal and State Education Policy, Texas Education Agency
Ed Peltz	Education Consultant, Office of Federal Programs, Ohio Department of Education
William Hatfield	Superintendent, Massac Unit District 1, Illinois, RLIS
Nancy Crowell	Superintendent, Elkhart USD 218, Kansas, SRSA (non-Flex)
Jim Guetter	Superintendent, Red Lake County School District, Minnesota, SRSA (Flex)
Patricia Dubois	Superintendent, Glocester School Department, Rhode Island, SRSA (Flex)
Vickie Ansley	Coordinator Title I/SCE, Region 16 Service Center, Texas, RLIS
Kathy Lee	Assistant Superintendent, Wynne Public Schools, Arkansas, RLIS
Diane Neal	Director of Secondary Curriculum/Federal Programs/Grants, Chillicothe City School District, Ohio, RLIS

#### **A.9. Payment to Respondents**

No payment to respondents will be offered.

#### **A.10. Assurances of Confidentiality**

As the lead in the data collection for the study, SRI will have its Institutional Review Board (IRB) review and approve all research protocols and data collection materials, including consent forms (included in Appendices A,B, and C). Protocols and materials will adhere to the Multiple Projects Assurance with the Office of Protection from Research Risks (OPRR) maintained by SRI. SRI's Assurance number is M-1088. SRI's Human Subjects Committee is its official IRB charged with responsibility for the review and approval of all research involving human subjects. SRI clears all data collection protocols through its internal Human Subjects Committee as a safeguard to protect the rights of research subjects.

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.

##### *All Data Collections*

The research team will protect the privacy and confidentiality of REAP interview and survey respondents to the extent possible. Researchers will make every attempt to keep confidential the names and any other identifying information about respondents. The contractor will not provide information that associates responses or findings with a respondent to anyone outside the study team. Individual responses will be kept confidential, to the extent possible, except as may be required by law.



Access to SRI's secure servers are password protected, with required changes at regular intervals and strong password elements. Each user's access is limited, determined by the network administrator.

Researchers will not report data in such a way that it would be possible to identify states, districts, or individuals. In reporting, the study will not disaggregate data to such a degree that it would be possible to identify individual school districts or individuals. The study will use pseudonyms for any individual state or school district. The study team may refer to the generic title of an individual (e.g., "superintendent"), but no state, district, or individual name will be used.

### *District Administrator Surveys*

The research team will maintain a tracking database with names and contact information for respondents separate from the survey responses. The 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.

### **A.11. Justification for Questions of a Sensitive Nature**

The surveys and interview protocols do not ask sensitive questions. However, given that the RLIS program targets districts with high child poverty rates, it is possible that information on students' financial, family, and social needs may arise during data collection. In SRI's experience, administrators are very careful not to disclose confidential information as they deal with student privacy concerns daily. Researchers will remind them at the beginning of interviews not to provide sensitive information about themselves or others by name.

### **A.12. Estimate of Information Collection Burden**

As described previously, this request relates to a sample of up to 1,000 surveys divided among SRSA and RLIS school district grant coordinators, and telephone interviews with REAP coordinators in all states receiving REAP funds in the 2014–15 school year<sup>3</sup>, and 30 school district grant coordinators around the country (10 RLIS, 10 SRSA REAP Flex, 10 SRSA non-Flex). (In addition to the telephone interviews with REAP coordinators in all states is a request for their assistance with providing contact information for the sample of survey respondents located in their respective states, as shown in the first row in Exhibit 2). Total annual response is therefore 326, and annual burden, 184 hours. Exhibit 2 and Exhibit 3 display the projected time burdens placed on the various survey and interview respondents, with state REAP coordinators shown in both exhibits, to cover both of their distinct roles described above.

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<sup>3</sup> All but two states (Hawaii and Vermont) had districts that received REAP funds in the 2013–14 school year. The research team anticipates that the number of states with REAP districts in 2014–15 will be close to 48.

## Exhibit 2. Number of Respondents and Burden Hours Expected for Surveys

Role	Number of Respondents	Time per Person	Total Time Burden Across All Respondents
State REAP Coordinator	48 <sup>a</sup>	60 minutes	48 hours
District RLIS or SRSA Grant Coordinators	853 <sup>b</sup>	30 minutes	427 hours
<b>Total</b>			<b>475 hours</b>
<b>Annualized Basis</b>	300		<b>158 hours</b>

<sup>a</sup> State REAP coordinators will be asked to provide contact information for sampled districts (see Appendix F).

<sup>b</sup> The survey will be sent to approximately 1,004 district coordinators. The response rate is expected to be 85 percent. This results in 853 total respondents.

## Exhibit 3. Number of Respondents and Burden Hours Expected for Telephone Interviews

Role	Number of Respondents	Time per Person	Total Time Burden Across All Interviews
State REAP Coordinator	48 <sup>a</sup>	1 hour	48 hours
District SRSA or RLIS Grant Coordinators	30	1 hour	30 hours
<b>Total</b>			<b>78 hours</b>
<b>Annualized Basis</b>	26		<b>26 hours</b>

<sup>a</sup> Researchers will update this number when 2014-15 REAP allocations and awards are available from the REAP Office.

While respondents suffer no direct monetary costs for this activity, their time is valuable, as estimated in Error: Reference source not found. The salary used to calculate hourly rates for each group of respondents is based on Bureau of Labor Statistics data from May 2012.

## Exhibit 4. Estimated Cost of Respondents' Time

Role	Time Needed	Hourly Wage (Estimated) <sup>4</sup>	Total Cost <sup>5</sup>
State REAP Coordinators <sup>a</sup>	96 hours	\$45.00	\$4,320
District RLIS or SRSA Coordinators	457 hours	\$45.00	\$20,565
<b>Total</b>	<b>529 hours</b>	-	<b>\$24,885</b>
<b>Annualized Basis</b>	<b>176 hours</b>		<b>\$8,295</b>

<sup>a</sup> Researchers will update this number when 2014-15 REAP allocations and awards are available from the REAP Office.

### 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 a total operation, maintenance, or purchase cost associated with the study.

<sup>4</sup> All estimates are from the Bureau of Labor Statistics (BLS), <http://www.bls.gov/data/>, retrieved on March 10, 2014. The State REAP Coordinator and District RLIS or SRSA Coordinator were all derived from BLS occupation code 11-9032 - "Education Administrators, Elementary and Secondary Schools."

<sup>5</sup> Costs are rounded to the nearest dollar.

#### **A.14. Estimate of Annualized Costs**

The estimated annualized cost of the study to the federal government is \$271,742. This estimate is based on the total contract cost of \$837,874, amortized over a 37-month performance period. It includes costs already invoiced, plus budgeted future costs that will be charged to the government for the study redesign, sampling, data collection, analysis, and reporting.

#### **A.15. Change in Annual Reporting Burden**

This is a new study and new data collection. The new collection generates a program change of 184 burden hours.

#### **A.16. Plans for Tabulation and Publication of Results**

A final report will contain integrated analysis of the survey and interview data.

##### *Timeline*

The survey data collection period will begin in February 2015, pending OMB approval. The planned schedule for the study, assuming receipt of OMB clearance by November 17, 2014, is shown in Exhibit 5.

#### **Exhibit 5. Planned Data Collection and Reporting Schedule**

<b>Project Activity</b>	<b>Dates</b>
<b>Collect district contact information</b>	December 2014 – January 2015
<b>Administer survey</b>	February 2015 – April 2015
<b>Begin interviews with state coordinators</b>	February 2015
<b>Begin interviews with district administrators</b>	February 2015
<b>Prepare data files, analyze data, prepare briefing</b>	May – July 2015
<b>Prepare Final Report</b>	July 2015 – January 2016

Researchers will draw a stratified random sample of REAP districts. Once the study has determined the random sample of 1,000 districts for the survey, the research team will ask the REAP coordinator in each state to identify and provide the phone number and email address for a contact for the REAP grant in each sampled district. The research team will email a link to a secure web-based version of the survey to these individuals in February 2015. The survey will remain open through April 2015. The research team will then tabulate and analyze results from the district survey after the survey closes. Appendix A contains a draft survey instrument, and Appendix F contains a template for collecting the contact information from the states needed to administer the instruments.

Training for state interviewers will occur prior to January 2015 so the research team will be ready to contact state REAP coordinators shortly after OMB approval. Training for district interviewers will occur prior to February 2015 so the research team can begin outreach to district coordinators sampled for a survey as soon as possible after the districts complete their surveys. The research team will select districts for the interviews out of those sampled for the survey. The research team will begin setting up district telephone interviews in late February, after sampled district administrators have had a chance to respond to the survey. Appendix B contains draft interview protocols.

##### *Analysis and Tabulations*

The research team will tabulate survey results by item and grant type. For some items, the report will present both the overall and the program specific results in one table. The tabulations will take this form

for questions where the question text and response options are the same for both program types. For example, the researchers will report the percent of districts using REAP funds to pay for each kind of activity overall and for each program type (see ). One section of the survey, addressing the use of REAP Flex, applies only to SRSA grantees. These questions will be tabulated just for SRSA respondents. An appendix to the report will contain standard errors of all reported percentages.

**Exhibit 6. Sample Table Shell: Percent of Respondent Districts Using REAP Funds to Pay for Each Activity Type**

	<b>Overall (n=XX)</b>	<b>SRSA (n=XX)</b>	<b>RLIS (n=XX)</b>
<b>Improve academic achievement</b>	xx%	xx%	xx%
<b>Improve teacher retention and/or recruitment</b>	xx%	xx%	xx%
<b>Provide professional development for teachers or administrators</b>	xx%	xx%	xx%
<b>Improve or expand access to technology</b>	xx%	xx%	xx%
<b>Address drug abuse and/or violence in your community</b>	xx%	xx%	xx%
<b>Address English language acquisition</b>	xx%	xx%	xx%
<b>Increase parental involvement</b>	xx%	xx%	xx%

The study team will also analyze the state and district interview data to identify themes that are common across states, as well as within each program type or common across the RLIS and SRSA districts. Researchers will quantify the state interview data, where possible, and aggregate and tabulate the results. For example, the researchers will count the number of state respondents who review the accuracy of the eligibility data for their districts. These tables will include both the percent of states that respond “Yes” to this question and the number of states that responded to the question (“Number of Respondents”; see Exhibit 7).

**Exhibit 7. Sample Table Shell: State Review of Eligibility Data**

	<b>Percent</b>	<b>Number of Respondents</b>
<b>State reviews eligibility data</b>	xx%	XX
<b>State encourages districts to review eligibility data</b>	xx%	XX

Additionally, the research team will use qualitative responses from the state and district interviews to illustrate quantitative findings from the survey and interviews.

*Reporting*

A publicly available report will integrate the results from all data collection activities, including the tables and illustrative quotes discussed above. In addition to this easily accessible written report that will be posted on the Department website, the Department and research team will identify other possible venues for dissemination. The final report will be approved by the end of the period of performance, October 26, 2015. The report will be structured as follows:

- I. Introduction: brief description of the REAP program and study design
- II. REAP eligibility determination process
- III. Planning and use of REAP funds, including coordination with other federal funds
- IV. REAP Flexibility provision
- V. Technical assistance needs, providers and perceived usefulness

VI. Summary of respondent satisfaction and recommended changes

VII. Conclusion

Appendix A: Methodology

- i. District survey: sampling methodology, description of sample and response rate
- ii. State and district interviews: sampling methodology and description of samples

Appendix B: Standard error tables

Appendix C: District administrator survey

Appendix D: District interview protocol

Appendix E: State interview protocol

### **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 to Certification Statement**

Not applicable. No exceptions are requested.

## References

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