

Incentives for the Adoption of the *Youth@Work – Talking Safety* Curriculum
Supporting Statement Part A

Request for Office of Management and Budget Review and Approval
for Federally Sponsored Data Collection

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Information Collection Request for
*Youth@Work – Talking Safety Curriculum Dissemination Project:
Incentives and Barriers for Adoption among Public School Districts*

A. Justification

1. Circumstance Making the Collection of Information Necessary

The Information Collection Request for *Youth@Work – Talking Safety Curriculum Dissemination Project: Incentives and Barriers for Adoption among Public School Districts* is classified as **New**. Approval is requested for two years.

Background

The mission of the National Institute for Occupational Safety and Health (NIOSH) is to promote safety and health at work for all people through research and prevention. In this capacity, NIOSH will explore the openness and interest of assistant superintendents and/or curriculum coordinators, from school districts in selected cities or locales across the United States, towards incorporating workplace safety and health knowledge and skills as a component of work-readiness for both academic, career, and vocational programs. Key informant interviews will be used to collect information on the receptivity of the school systems to incorporate workplace safety and health knowledge and skills as a component of their curricula focusing on career readiness within both academic and vocational education programs at the middle and high school level. Assistant superintendents and curriculum coordinators are the intended audience for this research, since these individuals most often are responsible for making curriculum decisions in general, and about curricula for specific content area(s). The information shared by these individuals will inform NIOSH on barriers and incentives for the inclusion of work place safety and health in the curricula and programs of U.S. middle schools and high schools. This information will be used in the design of programs that promote the inclusion of workplace

safety and health knowledge and skills as an important component of work-readiness within academic, career, and vocational programs.

This effort is important to the work of the NIOSH Safe-Skilled-Ready Workforce Initiative (SSRWI), which focuses on providing young workers with the knowledge and skills they need to better protect themselves and others before they enter the workforce. Providing foundational workplace health and safety knowledge and skills that can be applied to any job or career enables young workers to better protect themselves and others.

Most current work-readiness programs and frameworks do not include critical skills addressing workplace safety and health. However, societal and economic costs of work-related injuries and illnesses are a serious and persistent public health problem in the United States [Leigh 2011]. Workplace incidents cause an enormous amount of physical, financial, and emotional hardship for businesses, workers, and their families [Asfaw et al. 2010]. Young and new workers suffer disproportionately from workplace injury and illness. These injuries and illnesses may be life-altering, but are also predictable and preventable.

Approximately 17.5 million workers were less than 24 years of age in 2010, representing 13% of the workforce [NIOSH 2014b]. For the period 1997 through 2003, nearly 80% of high school students reported working while still in high school [BLS 2005; NIOSH 2013b]. During the 10-year period 1998-2007, an estimated 7.9 million nonfatal injuries to younger workers were treated in U.S. hospital emergency departments (EDs) [CDC 2010]. The nonfatal injury rate was 5.0 ED-treated injuries per 100 full-time equivalent (FTE) workers, approximately two times higher than among workers age 25 or over [CDC 2010]. One study estimated that work-related injuries for youths up to age 19 accounted for an annual cost of \$5 billion, or 3.9% of all workplace injury costs in the United States [Miller and Waehrer 1998].

Given the disproportionate number of workplace injuries and illnesses suffered by young workers, occupational safety education is a critical and urgent concern [Chin et al. 2010], and pre-work training, specifically addressing workplace safety and health, is critical to decreasing this health disparity [Schulte et al. 2005]. Although the Occupational Safety and Health (OSH) Act of 1970 regulates that employers have the primary responsibility for providing a safe and healthy workplace, future working generations should be equipped with a foundation of workplace safety and health knowledge and skills [Schulte et al. 2005].

In April 2013, NIOSH launched the Safe-Skilled-Ready Workforce Initiative (SSRWI) NIOSH [2013a]. The Initiative targets the delivery of foundational workplace safety and health knowledge and skills (NIOSH Eight Core Competencies) to young workers before they enter the workforce [NIOSH 2013a; Schulte et al. 2014]. These foundational skills form the basis for, and complement job-specific knowledge and skill curricula already being taught through apprenticeship and other vocational and career technical training programs [NIOSH 2013a; Schulte et al. 2014]. The eight core workplace safety and health competencies are general, transferable skills that can apply across all industries. They can be used with the job-specific skills that workers gain through apprenticeship and career technical or vocational training programs. These core competencies/skills can be used to improve the health and safety of individuals in other places as well, such as in homes, schools, or communities. The eight core competencies are the ability to:

- Recognize that, while work has benefits, all workers can be injured, become sick, or even be killed on the job. Workers need to know how workplace risks can affect their lives and their families.

- Recognize that work-related injuries and illnesses are predictable and can be prevented.
- Identify hazards at work and predict how workers can be injured or made sick.
- Recognize how to prevent injury and illness. Describe the best ways to address workplace hazards and apply these concepts to specific workplace problems.
- Identify emergencies at work and decide on the best ways to address them.
- Recognize employer and worker rights and responsibilities play a role in safe and healthy work.
- Find resources that help keep workers safe and healthy on the job.
- Demonstrate how workers can communicate with others- including people in authority roles to ask questions or report problems or concerns when they feel unsafe or threatened.

NIOSH believes that relevant workplace safety and health knowledge and skills are critically important and vital to every young person. A future workforce without safety and health knowledge and skills will continue to have a negative impact on public health and increases the risk of:

- More workplace injuries and illness
- Higher healthcare and related costs
- Lower productivity
- Loss of economic viability and competitiveness.

The *Youth@Work-Talking Safety* curriculum, developed by NIOSH and its partners, is the cornerstone of the Safe-Skilled-Ready Workforce Initiative (SSRWI) and the primary means through which NIOSH promotes the eight core competencies in workplace safety and health

[NIOSH 2014]. *Talking Safety* is free of charge, is meant to be used in a classroom or other group training setting, and is customized for all 50 states, Washington D.C., Puerto Rico, and the U.S. Virgin Islands to reflect state-specific child labor laws and resources.

One of the strategic goals of the NIOSH Safe-Skilled-Ready Workforce Initiative (SSRWI) is to integrate and institutionalize the foundational workplace safety and health skills as missing “life skills” in relevant pathways that involve/focus on adolescents¹. The pathway that potentially has the largest reach is the integration of the core competencies into middle school and high school programs/curricula within school districts across the United States. NIOSH is currently conducting demonstration projects in five U.S. states to find pathways for integration within public school systems for the curriculum in general, and the Eight Core Competencies specifically. The proposed study seeks to identify additional pathways and partners in public school systems.

Public Law 91-596, 91st Congress, S.2193, December 29, 1970, Section 20 (a)(1) of the Occupational Safety and Health Act (29 U.S.C. 669), enables CDC/NIOSH to carry out research relevant to the safety and health of workers (see Attachment A).

2. Purpose and use of Information Collection

This study will utilize 28 key informant interviews to explore attitudes and beliefs of public school assistant superintendents and/or curriculum coordinators as to the inclusion and integration of workplace safety and health skills (within the area of soft skills) in academic, career technical and vocational training programs in middle and high schools. These interviews will collect information on the receptivity of the school systems to incorporate workplace safety

¹ Life skills may be defined as the abilities for adaptive and positive behavior, i.e., the skills that “enable individuals to adapt to the demands and challenges of everyday life” [World Health Organization 1997].

and health competencies for adolescents (young workers) as a vital component of their curricula, within both academic and vocational education programs at the middle and high school level.

The data analyses and report will provide useful information for the institutionalization of the core competencies within curricula in academic, career technical, and vocational education programs at the middle and high school level. It will also be used to identify themes and develop best practices for future recruitment of school districts across the United States to integrate the *Talking Safety* curriculum into their programs and activities so that all young people, before they enter the workforce, have critical workplace safety and health knowledge and skills.

The results of this study will also be disseminated through peer reviewed journal articles and at academic and industry conferences. The information gathered by this project could be used by other federal agencies with activities focused on school health promotion programs. The results of this project will benefit public school districts by increasing awareness about high-quality educational tools and resources available to them, free of charge, that will teach youth foundational workplace safety and health skills that protect them now and throughout their working lives. Although beyond the scope of this study, it is expected that integration and institutionalization of these foundational skills (i.e. the NIOSH Eight Core Competencies) will lower rates of injuries and fatalities for young workers.

If the research team did not have the information from this data collection, it would lack any empirical basis for promoting workplace safety and health knowledge and skills as a component of curricula focusing on career readiness within both academic and vocational education programs at the middle and high school level. In addition, the lack of data would

prevent NIOSH from more effectively focusing its efforts to reduce the burden of occupational injuries and illnesses among working youth.

This data collection has been fully funded through internal NIOSH funds related to the Safe-Skilled-Ready Workforce Initiative (SSRWI). A contract for the data collection recruitment was let to a contractor, RTI, in FY2013. Data will be collected via one phone interview, once OMB approval has been obtained.

3. Use of Improved Information Technology and Burden Reduction

The key informant interviews will be conducted by skilled and experienced researchers under contract to NIOSH by phone to participants in settings familiar to them, such as their place of employment. The interview questionnaire will be administered verbally to participants in English. The data collection will not use electronic respondent reporting for several reasons. Attempting to collect the data using a computer would only increase the response time and add an additional level of discomfort for the majority of the respondents. This will require the interviewer to read the items to many of the respondents and record their answers. Additionally, open-response format and follow-up probes are not appropriate for computer administration. For these reasons it was determined that electronic responding would increase rather than decrease the burden for the majority of respondents.

4. Efforts to Identify Duplication and use of Similar Information

In the process of creating the current interview guide, the NIOSH researchers conducted literature searches and consulted experts in the field. To date, no interview instrument on incentives for public schools districts' adoption of foundational workplace safety and health skills (more generally), or specifically the NIOSH *Youth@Work-Talking Safety* curriculum has been found. The use of this interview instrument will provide NIOSH with information essential

to understanding the barriers and incentives within public school districts across the United States to teaching young people vital workplace safety and health knowledge and skills. It will also address a gap in the professional literature by contributing qualitative data to address a problem that has been largely overlooked.

5. Impact on Small Businesses or Other Small Entities

No small businesses will be involved in this data collection.

6. Consequences of Collecting the Information Less Frequently

The data will be collected from the respondents one time only. There are no legal obstacles to reduce the burden. The proposed project requires the data to inform the efforts and activities of NIOSH to promote workplace safety and health knowledge and skills as a component of curricula focusing on career readiness within both academic and vocational education programs at the middle and high school level. In addition, the lack of data would prevent NIOSH from more effectively focusing its efforts to reduce the burden of occupational injuries and illnesses among working youth.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

This request complies with the regulation 5 CFR 1320.5

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the

Agency

A. A 60-day Federal Register Notice was published in the Federal Register on 07/17/2014, Vol. 79, No. 137, pp. 41690-41691 (see Attachment B). One non-substantive public comment was received on 7/18/14 in response to the FRN (see Attachment K). A courtesy reply was sent in response.

B. The following individuals provided peer review of the protocol in the current calendar year (2014):

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There were no major concerns indicated by the reviewers that could not be resolved through consultation.

9. Explanation of Any Payment of Gift to Respondents

There will be no compensation or gifts offered to the respondents

10. Assurance of Confidentiality Provided to Respondents.

This submission has been reviewed by the Information Collection Review Office (ICRO), who determined that the Privacy Act does not apply. No information in identifiable form will be collected from respondents. They will also be asked to provide a small amount of demographic information including position or title and how long they have worked in their school district (see Attachment I). The survey will be administered only once to each respondent and therefore there will be no need to collect contact information for follow-up. The interview will be administered through a NIOSH contract. All data will be recorded on standard forms and

belongs exclusively to NIOSH. There is no distinction between the data collected and the data that NIOSH will retain.

IRB Approval

The requested information collection has been determined to be exempt from IRB review. It was determined to not be Human Subjects Research, since the focus of this research is on public school systems in the United States.

10.1 Privacy Impact Assessment Information

Overview of the Data Collection System

This study will utilize 28 key informant interviews to explore attitudes and beliefs of public school assistant superintendents and/or curriculum coordinators as to the inclusion and integration of workplace safety and health skills (within the area of life skills) in academic, career technical and vocational training programs in middle and high schools. These interviews will collect information on the receptivity of the school systems to incorporate workplace safety and health competencies for adolescents (young workers) as a vital component of their curricula within both academic and vocational education programs at the middle and high school level. NIOSH data collection partners on this project are experienced researchers from Research Triangle Institute (RTI).

Respondents will consist of those staff who are responsible for making decisions about the curriculum delivered within their school districts for specific content area(s) (such as health education, family and consumer sciences, or others) where the *Talking Safety* curriculum would find a fit. The following inclusion criteria will be used in this phase of the study. Participants must:

- be at least 18 years of age;

- have a formal position (assistant superintendent; curriculum coordinator/director; or related position) within school districts identified for this study;
- be responsible for making decisions in their school district about curriculum that would include workplace safety and health.

Participants will be selected from a pool of 84 school districts, consisting of 21 randomly assigned districts from each of the 4 regions of the United States (Northeast, Midwest, West, and South) as defined by the U.S. Census Bureau. Recruitment materials will include a letter (Attachment D) detailing the purpose of the study, and the NIOSH *Youth@Work-Talking Safety* curriculum information sheet (Attachment L). The study materials will be mailed first to the superintendent's office of possible school districts. Study materials will be sent to all schools simultaneously. A week after the materials are sent, we will follow up with calls to the superintendent's office (Attachment F). During this call, we will consult with either the superintendent or, more likely, the superintendent's assistant, to determine the best individual from the school to act as respondent in the interview. In addition to shortening the process for identifying the respondent, this screening process will have the added advantage of allowing the recruiter to mention that we got the potential study respondent's name from the superintendent's office. One person will be interviewed in each district.

Potential study respondents will receive an introductory letter (Attachment C) describing the goals of the study, and explaining the process of conducting the interviews. These introductory letters will also include a brief introduction to the *Talking Safety* curriculum, and a copy of the NIOSH *Youth@Work-Talking Safety* curriculum information sheet (Attachment L). The letter informs the potential key informants that they will be contacted to schedule an interview. These

individuals are also provided contact information for NIOSH and the contractor conducting the interviews. These materials will be sent via Federal Express to help highlight their importance.

Respondents will be contacted via telephone (Attachment E) a few days after the screening materials are mailed. The aim of the initial call is to confirm the eligibility of the selected respondent, discuss the interview process and to secure participation. The specific items to include during the screening calls include the following:

- Sharing the goals for the interview
- Confirming that this person is most appropriate to interview. If not, get a recommendation of another person on district staff and begin the process again.
- Stating the process for conducting the interview and how long the interview will take
- Noting how the respondent's data will be used in the report and how it will be protected after the interview.
- Securing agreement to participate in the interview.

Within each region and locales, we will interview the first qualified individual who agrees to the interview. When a target respondent agrees to be interviewed, a time is scheduled at the respondent's convenience. The follow-up email (attachment G) will be sent thanking the respondent for agreeing to be interviewed, confirming the interview time, and providing contact information in case the respondent needs to reschedule the interview. Forty-eight hours prior to the interview, the same email will be sent again as a reminder to the respondent.

It is estimated that the interviews will take approximately 30 minutes to complete. The interviews will be conducted on the telephone and will be audio-recorded. Participants will not be compensated for these interviews. Individuals will be provided with information about the purpose of the study. They also will be told that whatever information they share will be kept

private to the extent permitted by law. Data will be collected using the interview guide (Attachment I) and also will include spontaneous probes to clarify or follow-up on responses to the questions in the guide. In addition to the items directly related to the study, some basic demographic information from participants regarding their position in the organization will be collected. No sensitive and/or personally identifiable information will be collected as part of this study.

Results from the interviews will be used to gain an understanding about how districts across the United States integrate new materials into school curricula, the extent to which districts currently include workplace health and safety materials in curricula, and whether districts would consider including the vital work readiness skills taught through the Talking Safety curriculum into current programs. NIOSH also would like to understand the challenges districts might face in including these concepts.

The interviews will begin with a consent statement (Attachment H). Each interviewee will be asked to consent verbally before beginning the interview. They also will receive, by email, a handout that contains the name and contact information for the project officer should they have questions related to the study and the contact information for the NIOSH IRB office should they have questions about their rights or privacy. We do not anticipate any significant risks. Participation/non-participation is entirely voluntary. Participants will be advised that there is a small risk that their participation or the information they provide will not remain private. The data collection will not use electronic respondent reporting as attempting to collect the data using a computer would only increase the response time and add an additional level of discomfort for the majority of the respondents. The interviewer will read the items to the respondents and their

answers will be recorded on a digital audio device. The questions will be open-ended and follow-up probes will be used.

The recordings will be saved on a password protected computer and/or on CDs that will be stored in a locking file cabinet for the duration of the project (up to 5 years) in the Taft Building of National Institute for National Occupational Safety and Health (NIOSH) in Cincinnati, OH. Only the investigators will have access to the recordings once the data transcriptions are complete. The recordings will be destroyed at the end of the study. The proposed collection will have no impact on the respondent's privacy other than their identity being known among the research team members.

Items of Information to be Collected

The specific research questions to be addressed through these interviews include:

- What are the perceptions of these individuals (as representatives of their school systems) towards workplace safety and health and the inclusion of workplace safety and health competencies in curricula within academic, career technical, and vocational education programs at the middle and high school level? What do they perceive as the barriers to inclusion and what would incentivize them towards inclusion?
- What value do these individuals place on the eight core competencies (as a way to provide students with the skills they need to stay safe and healthy at work?) If a high value, why? And, if a low value, what would help them find value?
- What benefits (academic or social) would be considered important to assistant superintendents and/or curriculum coordinators/directors for integrating basic workplace safety and health competencies into their school curricula? If you were told that students

who get hurt at work perform less well academically, would it be an incentive to teach students the competencies to help them stay safe at work?

- Where could they see the competencies fitting into existing programs in the academic, career technical education, and vocational tracks? At what grade level do you think these competencies should be introduced?
- How do public school assistant superintendents and/or curriculum coordinators/directors make decisions about implementing new materials into school curricula/programs? How are these decisions implemented at the school level? How do assistant superintendents and/or curriculum coordinators/directors interact with principals and teachers in implementing- and institutionalizing- curricula and other decisions that affect classroom content and learning/academic standards?
- What do they see as the role of the Board of Education in making decisions about implementing new materials into school curricula/programs?
- If provided with a free, tested, and relevant curriculum (such as *Youth@Work-Talking Safety*), would they consider it for adoption within their school district? If yes, what other materials in addition to the curriculum might they need to facilitate its adoption and how would they implement the curriculum in their schools? If they would not consider adopting the curriculum, why not?

The data will be responses to topics in the discussion guide (see Attachment I). No individually identifiable information is being collected.

How Information Will be Shared and for What Purpose

The data gathered in this project will be shared among the research team including NIOSH staff and the contractors conducting the data collection for purposes of analysis and

summary reporting. The results of this study will also be disseminated through peer reviewed journal articles and at academic and industry conferences.

Impact of the Proposed Collection on the Respondent's Privacy

No Information in Identifiable Form (IIF) is being collected. The proposed collection will have no impact on the respondent's privacy other than their identity being known among the research team members.

Informing Participants that Providing Information is Voluntary or Mandatory

At the beginning of the interview, individuals will be informed that their participation is voluntary.

Opportunities for Participants to Consent

Participants will have the opportunity to consent to their information being included in the results of the research.

How the Information Will be Secured

Information from this data collection will be saved on a password protected computer and/or on CDs that will be stored in a locking file cabinet for the duration of the project (up to 5 years) in the Taft Building of National Institute for National Occupational Safety and Health (NIOSH) in Cincinnati, OH. Only the investigators will have access to the recordings once the data transcriptions are complete. The recordings will be destroyed at the end of the study.

Whether a System of Records is being Created under the Privacy Act

No Information in Identifiable Form (IIF) is being collected, so no system of records is needed.

11. Justification for Sensitive Questions

No sensitive questions will be asked.

12. Estimates of Annualized Burden Hours and Costs

A. The screening pool will include 84 school districts, which will receive one call (Attachment F) to their superintendent’s office to identify the best potential respondent to be interviewed for that district. This screening call will take 7 minutes to complete, for an estimated annual burden of 10 hours. We will then contact the potential respondents identified by the superintendent’s office with a recruitment call (Attachment E) to secure participation and schedule an interview. The screening call to respondents will take 7 minutes to complete, for an estimated annual burden of 10 hours. Study Participants will include 28 respondents (most likely assistant superintendents and/or curriculum coordinators), from school districts in selected cities or locales across the United States. Each respondent will provide one response to the interview Discussion Guide (Attachment I) over the study period of 2 years. Reviews and trial administrations with representative members of the target audience were conducted in English as part of the development of the interview instrument. Based on this data, it is estimated that the interview will take 30 minutes to complete. One response per individual estimated at 30 minutes each, for 28 respondents results in an estimated annual burden of 14 hours. The total estimated annual burden for this project is expected to be 34 hours.

Estimated Annualized Burden Hours

Type of Respondents	Form Name	No. of Respondents	No. of Responses per Respondent	Average Burden per Response (in hours)	Total Burden (in hours)
Public School Officials	Recruitment Script for Superintendent’s Office	84	1	7/60	10
Public School Officials	Recruitment Script for Respondent	84	1	7/60	10

Public School Officials	Discussion Guide	28	1	30/60	14
Total					34

B. Respondents will be employed in public school districts across the United States, and will consist of those staff who are responsible for making decisions about the curriculum delivered within their school districts for specific content area(s) (such as health education, family and consumer sciences, or others) where the NIOSH *Talking Safety* curriculum would find a fit. According to the Bureau of Labor Statistics website, the hourly mean wage for Elementary and Secondary School Education Administrators in May 2013 was \$43.59. We have rounded this to \$44.00 to simplify calculations (source: <http://www.bls.gov/oes/current/oes119032.htm>; retrieved 06/26/2014).

Type of Respondent	Form Name	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
Public School Officials	Recruitment Script for Superintendent's Office	10	\$44.00	\$440
Public School Officials	Recruitment Script for Respondent	10	\$44.00	\$440
Public School Officials	Discussion Guide	14	\$44.00	\$616
Total				\$1,496

13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers

A. There is no capital or start-up costs for the collection of information in this project.

B. There is no cost to respondents for operation or maintenance of this project. Respondents are not asked or expected to purchase any services.

14. Annualized Cost to the Government

The cost of this study will include the contract to conduct key informant interviews and data collection, and two NIOSH personnel to oversee the data collection and the data analysis.

Costs for these two NIOSH staff members are summarized in the table below.

RESEARCHER	Base And Benefits	Time on project	Cost for one year
Personnel 1 GS 12	\$101,521	10%	\$10,152
Personnel 2 GS 15	\$175,885	5%	\$8,794
Total Annualized Salary and Benefits			\$18,946

There will be no new overhead, support staff, or construction required for the survey administration and data analysis. The average annual cost for the project appears in the table below.

Contract to conduct key informant interviews, including data collection and analysis	\$ 80,097
Annualized salary and benefits	\$ 18,946
Total annualized cost to the government	\$ 99,043

15. Explanation for Program Changes or Adjustments

This is a new data collection

16. Plans for Tabulation and Publication and Project Time Schedule

The notes from the interviews will be coded looking for meaningful analytical units (segments of data). The data will be examined for both a priori codes (developed prior to

examining the data based on the questions of interest) as well as inductive codes that emerge directly from examining the data. The analysis also will look for any co-occurring codes or segments of data that partially or completely overlap and get coded with more than one code. A master list of all the codes created will be developed. This coded data will be summarized into a report enumerating the occurrence of codes within the data and searching for relationships in the data. The data will be synthesized so that individual information provided will not be associated with a respondent’s name or institution. The analyses and report will focus on examining data specific to the questions of interest that will provide useful data for the institutionalization of the core competencies within curricula in academic, career technical, and vocational education programs at the middle and high school level. It will also be used to identify themes and develop best practices for future recruitment of school districts across the United States to integrate the *Talking Safety* curriculum into their programs and activities so that all young people, before they enter the workforce, have critical workplace safety and health knowledge and skills.

A timeline of the study activities is outlined in the table below.

Project Time Schedule	
Activity	Timeline
Initial contact	0 - 1 months after OMB approval
Step 1. Recruitment materials provided to contractors	
Step 2. Send initial Fed Ex packages with advance materials to district superintendents	1 week after receipt of recruitment materials (Step 1).
Step 3. Contact superintendents’ offices to identify most appropriate interview participant. If the superintendent refuses to participate or we cannot reach the superintendent after 4 attempts (email and voicemail), we will begin the recruiting process with the next district in that region.	Begin 1 week after Fed Ex packages are delivered. (Step 2).

Step 4. Send advance materials to interview target	1 week after getting information from superintendents (Step 3).
Data collection	6 - 18 months after OMB approval
Step 5. Conduct screening calls of interview target. If target contact is unavailable after 4 contact attempts or refuses to participate, contact alternate person in the district. Begin round 2 of screening call attempts 10 days later. Begin round 3 of screening call attempts 10 days after that. If after 3 rounds, no one in the district will participate, begin recruiting alternate district. On any round, when a person agrees to do the interview, schedule it on that call.	Begin 1 week after target receives the information packets.
Step 6. Conduct interviews	As soon as is convenient for the interview subject.
Analyses	18 - 24 months after OMB approval
Publication	24 - 36 months after OMB approval

17. Reason(s) Display of OMB Date is Inappropriate

The OMB approval number and expiration will be displayed on all materials given to the contractor.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.

References

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