

**Supporting Statement for the Evaluation of the Poetry Out Loud
Program, Part A**

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Part A. Justification

1. Explain the circumstances that make the collection of information necessary.

This study is a new data collection request, and the data to be collected are not available elsewhere unless collected through this information collection. The data collection activities are planned for September 2018 through June 2019. The study will provide the National Endowment for the Arts (NEA) a better understanding of student-level outcomes associated with the Poetry Out Loud program.

Since its founding in 2005, Poetry Out Loud (POL) is a national arts education program implemented annually that encourages the study of great poetry. The program consists of a tiered poetry recitation competition to high schools across the country supported by free educational materials. Beginning at the classroom level typically during the fall semester, winners will advance to a school-wide competition, then to a regional competition (if implemented in the state), then to a state competition, and ultimately to the national finals in Washington, DC, held in late April or early May. The program is a partnership among the National Endowment for the Arts (NEA), the Poetry Foundation,¹ and the state and jurisdictional arts agencies of the United States. POL serves more than 3 million students and 50,000 teachers from 10,000 schools in every state plus Washington, DC, the US Virgin Islands, and Puerto Rico.

Information about the competition and instructional resources is provided through the Poetry Out Loud website (poetryoutloud.org). Participating teachers use the Poetry Out Loud

¹ The Poetry Foundation, publisher of *Poetry* magazine, is an independent literary organization committed to a vigorous presence for poetry in our culture.

toolkit (including the [Teacher's Guide](#) and classroom posters) and online resources (including [lesson plans](#), [learning recitation videos](#), and [information on how to run a competition](#)) to teach poetry recitation and run classroom competitions. Students select, memorize, and recite poems from an [online anthology](#) of more than 900 classic and contemporary poems. Information on [evaluation criteria and judging](#) is also publicly available on the website.

Poetry Out Loud is implemented in schools and classrooms in generally one of two ways—requiring mandatory student participation or allowing students to voluntarily participate in the program. Mandatory participation means that a teacher requires his or her entire class(es) to participate in the Poetry Out Loud program. Some schools may additionally require grade-level participation or even school-wide participation. In contrast, some schools may opt to have students voluntarily participate in the program. This means that students self-select to participate in Poetry Out Loud whether this is in the classroom or in an after-school club.

Each organizing partner makes significant contribution to program planning and implementation. Each year, the NEA and Poetry Foundation collaboratively: develop or update the content and design of all Poetry Out Loud program materials (including the Teacher's Guide, anthology, poster, and website); coordinate and provides technical assistance to program managers at the state arts agencies; plan the Poetry Out Loud National Finals; and invest in expanding the program's reach to new audiences. The NEA provides funding to state arts agencies to implement the program and to run the national finals as well as support and resources for state and local-level partners, teachers, and students. The Poetry Foundation provides funding for the program's prizes, travel, permissions, website, materials, and distribution of materials in addition to support and resources for state and local-level partners, teachers, and students. Each state arts agency is responsible for administering Poetry Out Loud in their state. This includes

publicizing the program, recruiting schools to implement Poetry Out Loud in the classroom, and conducting a state competition. Each state arts agency receives an NEA grant of \$17,500 to assist with expenses of Poetry Out Loud program coordination.

The study supports the Agency's FY 2018-2022 Strategic Plan, which seeks in part to "expand and promote evidence of the value and impact of the arts for the benefit of the American people" (Strategic Objective 3.2). The current evaluation study will be the first since 2008. The prior implementation evaluation, which was commissioned by the Poetry Foundation, focused on the reach, support, and engagement with POL by students and participating schools, providing compelling evidence that the program had continued to grow (over the course of the three years) and reach increasingly diverse students, rural schools, and schools with and without existing strong arts programs. Additionally, the evaluation found that POL helped to facilitate both the engagement and retention of teachers by providing them resources to bolster existing curricula. With respect to student-level outcomes, the evaluation focused largely on poetry appreciation and engagement. However, since the evaluation engaged only state-level POL student champions, these study findings are not assumed to be representative of POL participants in general.

The current evaluation was requested by NEA senior leadership and program partners who seek to build upon the past evaluation by increasing understanding of POL's impact on student participants. Specifically, agency and partner staff expressed interest in understanding the impact of POL on students who had not volunteered to participate – that is, students whose teachers required their participation in POL ("mandatory student participation") – in order to reduce or eliminate the bias associated with self-selection. The study will focus on assessing student outcomes in poetry appreciation and engagement, but also student-level outcomes

associated with social and emotional development, and academics. In order to more fully understand the impact of POL, a quasi-experimental design was sought that established a comparison group of students who did not participate in POL.

Program managers are also interested in understanding the effectiveness of the program when it is implemented under conditions promoted by the POL partners as optimal. The current study is structured as an efficacy study in order to examine the student-level benefits of this program under these optimal conditions. Because POL programming varies across schools and not all schools that implement POL do so under optimally conditions, the present study is not intended to be representative of the entire universe of schools implementing POL.

The study design reflects the agency's understanding of the program, as reflected in the POL logic model. This logic model (see Figure 1), which was updated in 2017 following a review of the 2008 evaluation study and a literature review, was based on the following theory of change: by providing access to educators and students with comprehensive poetry resources, engaging students with thoughtful curricula that encourages the performative aspect of poetry, and creating a national competition structure to challenge students and celebrate their accomplishments, the NEA expects that by participating in Poetry Out Loud: students' academic and performance skills are strengthened, students' social and emotional health improves, teachers' knowledge of and confidence in teaching poetry increases, and students and their community's awareness and appreciation of poetry and arts programming increases.²

² While the POL logic model signals the program's intent to positively affect teachers and communities, the NEA senior leaders and program managers focused the current study on student-level outcomes only since the impact on students was considered of primary importance.

Fig. 1 Poetry Out Loud Logic Model

Mission Statement: A national recitation contest supported by the National Endowment for the Arts (NEA), Poetry Foundation, and State and Jurisdictional Arts Agencies (SAAs), **Poetry Out Loud** encourages the nation's youth to learn about great poetry through memorization and recitation, helping students master public speaking skills, build self-confidence, and learn about literary history.

Inputs	Strategies	Anticipated Outcomes	Impact
<p>POL leverages strong partnerships to ensure consistent, high quality programming:</p> <ul style="list-style-type: none"> The NEA provides funding for SAAs to implement the program and to run the National Finals as well as support and resources for state and local-level partners, teachers, and students. The Poetry Foundation provides funding for the program's prizes, travel, permissions, website, materials, and distribution of materials in addition to support and resources for state and local level partners, teachers, and students. State Arts Agencies publicize the program, recruit teachers and schools to participate, and develop and conduct the state-level finals program.¹ 	<p>POL seeks to elevate poetry and harness its power to support student development by:</p> <ul style="list-style-type: none"> Developing and providing easy access to a robust, diverse, and growing anthology of poetry Engaging students in thoughtful, complex curricula that encourages deep engagement with and analysis of poetry Providing educators with easy access to strong, tested poetry curriculum Providing a comprehensive package of teaching tools and resources to support effective instruction Nurturing and promoting the expressive and performative aspect of poetry Creating a highly visible, national performance venue to challenge students and celebrate their accomplishments 	<ul style="list-style-type: none"> Students' capacity to analyze poetry grows Students' engagement in learning increases Students' knowledge of literary history increases Students' language arts proficiency grows 	<p>Students' Academic Skills & Performance are Strengthened</p>
<p>Contextual Factors</p> <p>There are a number of external factors that can affect POL implementation and outcomes, including (but not limited to):</p> <ul style="list-style-type: none"> Prior experience with POL Years of teaching experience and efficacy in teaching poetry Socioeconomic factors that can impact learning (e.g. poverty rates) School social/cultural context 	<ul style="list-style-type: none"> Students' confidence increases Students' sense of self/identity grows Students' engagement in the larger school community grows 	<ul style="list-style-type: none"> More teachers exposed to arts education programming Teachers' knowledge and appreciation of poetry increases Teachers strengthen their ability to effectively teach poetry Teachers' enthusiasm for teaching poetry increases 	<p>Students' Social and Emotional Health Improves</p>
			<p>Teacher Knowledge of & Confidence in Teaching Poetry Increases</p>
		<ul style="list-style-type: none"> Students and community experience increased exposure to poetry Students and community express appreciation for arts programming and poetry Students and community are exposed to the work of State Arts Agencies, NEA, & the Poetry Foundation Students and community members increase their participation in arts programming 	<p>Awareness and Appreciation of Poetry and Arts Programming Increases</p>

¹ Some SAAs supplement NEA funds with additional state funds and/or private donations, or establish organizational partnerships, that enable special trainings and workshops for participating students and teachers or add to the prize amounts.



- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

A2.1 Study Overview

The study will focus on assessing student outcomes in poetry appreciation and engagement, as well as on social and emotional development, and academic achievement using a rigorous quasi-experimental design combined with qualitative data collection and analysis of program implementation in a purposive sample of 10 schools. Figures 2, 3, and 4 outline the research questions, outcomes, constructs, indicators, and data sources for this study. Each matrix represents one of the following three domains: (1) student academic engagement and performance; (2) student socio-emotional development; and (3) student poetry appreciation.

Figure 2: Poetry Out Loud Academic Engagement and Performance Evaluation Matrix

































Research Questions	Outcomes				Constructs	Indicators	Data Source				
	Learn/Engage	Analytical Cap	Lit History	ELA Proficiency			Student Records	Student Surveys	Student Interviews	Teacher Interviews	Admin Interviews
Does student participation in POL correlate with increased academic engagement in English classes and/or in school more generally?					<ul style="list-style-type: none"> - Academic engagement in English classes - Academic engagement in school - Academic motivation in school - Post high school aspirations 	<ul style="list-style-type: none"> - # absences - # suspensions - Relevant results from interviews and surveys 					
					<ul style="list-style-type: none"> - Academic achievement in English classes and in school 	<ul style="list-style-type: none"> - Standardized ELA scale scores - Standardized ELA proficiency scores - Relevant ELA assessments - Student GPA 					
Does POL have a positive impact on students' reading comprehension and/or analytical skills (particularly regarding poetry)?					<ul style="list-style-type: none"> - Reading comprehension - Analytical skills reading poetry 	<ul style="list-style-type: none"> - Scale scores in standardized test scores in reading comprehension 					
Are POL students more likely to be comfortable using metaphor, simile, or a wider vocabulary in writing or in speaking after the program?					<ul style="list-style-type: none"> - Comfort with different poetry forms and devices - Vocabulary development 	<ul style="list-style-type: none"> - Relevant results from interviews 					

Figure 3: Poetry Out Loud Social and Emotional Development Evaluation Matrix

Research Questions	Outcomes				Constructs	Indicators	Data Source					
	Confidence	Sense of Self	Community Engagement	Art Prog			Student Records	Student Surveys	Student Interviews	Teacher Interviews	Admin Interviews	
Do students experience increased self-confidence in: their public speaking abilities, social skills, intellectual abilities, or in general after participating in POL?					- Self-confidence	- Scaled survey scores related to confidence in public speaking - Relevant results from interviews						
Do students feel more secure, empowered, and/or articulate in expressing themselves after participating in POL?					- Self-confidence - Empowerment	- Scaled scores related to comfort with self-expression - Relevant results from interviews						
Are students more likely to engage in civic activities during or after participation in POL?					- Civic engagement and leadership	- Survey scores related to participation in community activities - Survey scores related to involvement in student leadership - Relevant results from interviews						
Are students more likely to engage in extracurricular activities during or after participation in POL?					- In- and Out-of-School engagement	- Survey scores related to participation in extracurricular activities, school clubs, and/or after school programs - Relevant results from interviews						

Figure 4: Poetry Out Loud Poetry Appreciation and Engagement Evaluation Matrix

Research Questions	Outcomes			Constructs	Indicators	Data Source					
	Poetry Exposure	Arts Appreciation	Exposure to SAA/NEA/PF			Student Records	Student Surveys	Student Interviews	Teacher Interviews	Admin Interviews	
Does participating in POL correlate with students' increasing their likelihood of reading or writing poetry for pleasure?				<ul style="list-style-type: none"> - Behaviors related to reading poetry - Behaviors related to writing poetry 	<ul style="list-style-type: none"> - Agreement with reading poetry - Agreement with writing poetry - Relevant results from interviews and surveys 						
Does POL promote the sharing of poems among students and if so, by what means? Do students talk about poetry or POL on social media networks after the participation versus before?				<ul style="list-style-type: none"> - Sharing poetry with peers - Sharing poetry via social media (Facebook, Instagram) 	<ul style="list-style-type: none"> - Frequency scale of poetry exchanges via social media type - Relevant results from interviews and surveys 						
Does a teacher or a school's participation in POL correlate with greater incorporation of poetry in classroom/school instruction?				<ul style="list-style-type: none"> - Increased poetry content in curriculum 	<ul style="list-style-type: none"> - Frequency scale of poetry inclusion in curriculum - Relevant results from interviews 						
Does POL participation correlate with any attitudinal changes toward poetry, academics, public speaking/performing, or post high school aspirations?				<ul style="list-style-type: none"> - Attitudes toward poetry - Attitudes toward public speaking - Post high school aspirations 	<ul style="list-style-type: none"> - Scale of attitude toward poetry - Scale of comfort with public speaking - Attitude about finishing HS - % planning to go to college - Relevant results from interviews 						

The quasi-experimental design will include pre- and post-student surveys of POL program participants and non-participants and statistical analyses of student record data (e.g. test scores, attendance) for all students in the 10 schools selected for the study. In the analyses of student record data, we plan to use propensity score matching to construct a comparison group of non-POL participants who are similar to the students who participate in POL. Additional details about this process are later described in Supporting Statement B. In addition, we will conduct qualitative data collection in 10 schools to help understand POL program implementation and the experiences of those in the comparison group.

To reduce duplicative data collection and combine all data into one dataset, the research team considered linking the administrative and survey data. However, linking these two datasets requires a student-level unique identifier that falls under the FERPA definition of personally identifiable data (PII). According to FERPA (34 C.F.R. 99.3), PII includes any information that, alone or in combination, is linked or linkable to a specific student that would allow an individual to identify the student. POL participating schools receive federal funds and will be subject to FERPA. As a result, schools can only disclose PII with prior written consent from the parent or eligible student. Asking for and collecting written parent consent (as opposed to the proposed passive consent approach) from every student will greatly reduce the number of students participating in the study, thus compromising the desired 80% survey response rate and greatly reducing the number of students in the administrative dataset. Educational researchers can use de-identified student information that is not subject to FERPA's requirement. Therefore, the study design calls for educational records from schools that do not contain PII. While this means that the contractor will not be able to link the administrative data to the survey data, obtaining

de-identified student information will enable the study contractor to reach the desired sample size required for the study's design (as discussed in Supporting Statement B).

Qualitative data collection at each of the 10 schools will include one 60-minute focus group with students, four 45-minute student interviews, two 45-minute teacher interviews, one 30-minute administrator interview (either a school principal or State Arts Agency administrator). The number and duration of interviews described add up to six hours – the typical length of a school day, which is the length of time planned for site visits. The combination of student focus groups and interviews should allow us to speak with approximately 100 students and 20 teachers across study schools.

The contractor will pursue a passive consent strategy.³ That is, parents will be informed about the study via a letter from the research team that the school assists in distributing to students. Parents who object to their child participating in the study can return the form signed and that child will not be included in the study; all others will be included. Youth participating in interviews will be informed by the interviewer that participating in the interview is voluntary, and that they can opt out at any time. Youth taking the survey will be notified electronically, on the first page of the survey, that taking the survey is voluntary and that they can opt out at any time. Students will receive an individual email with a unique link to the survey. This survey will be accessible to students on a computer, tablet, or smartphone. Ideally, teachers at each school will dedicate class time for students to take the survey either using a classroom set of computers

³ Generally speaking, fewer people opt out of opportunities than opt in. Therefore the risk of nonresponse bias may be lower with the proposed approach because a smaller share of the sample will opt out. Weights will be constructed to adjust for differences between participants and nonparticipants.

or a school computer lab. However, we recognize that each school context is different, and some students may need to take the survey outside of classroom time. Additional detail on the survey administration process is provided in Supporting Statement B. Students will provide a verbal or electronic assent to participate. (See **Attachment A** for consent and assent forms in English and in Spanish.)

A2.2 Purpose of the Data Collection

The purpose of this evaluation study is primarily to assess the student-level outcomes associated with the POL program. The study aims to discern specific student-level outcomes that are associated with participation in POL. This is an efficacy study. Efficacy studies examine the benefits of an intervention under optimal conditions for the implementation of the Poetry Out Loud program in schools. Because POL programming varies across schools and not all schools that implement POL do so under optimally conditions, the present study is not intended to be representative of the entire universe of schools implementing POL. Instead, the study will observe the outcomes of interest under optimal conditions⁴ maximizing the likelihood of observing program effects.

⁴ Optimal conditions as determined by the Poetry Out Loud program partners are as follows: states should have an overall count of participating students exceeding 2,500; an overall count of participating schools exceeding 20; presence of ancillary activities supporting state finals competitions, direct student exposure to a working artist, and celebratory activities for students and families such as a welcome banquet or reception; formal teacher recognition at the state level; opportunities for winning students to perform at local arts events throughout the state; strong support for the POL program from executive leadership at the state arts agency; workshops for teachers and/or students facilitated by the state arts agency; matching or overmatching of POL grant money with funds from the state arts agency; and an annual program assessment.

A2.3 Who Will Use the Information

The study will provide information about POL to program participants (i.e. state arts administrators, teachers, and students) and the NEA and their partners about the benefits of participation. This information will be used to assess the agency's investment in this program and as an input for programmatic decision-making. Study findings will be shared with the public through various media and press outlets that include but is not limited to the NEA website, the POL website, and partner websites.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

The NEA takes very seriously its responsibility to minimize burden on respondents and designed this project with that goal in mind. First, by designing a web-based student survey, the Agency has eliminated hundreds of hours of labor that would have been required to administer a paper-based on-site survey. By making the survey web-based, it becomes possible to survey every member of a participating school. Because there are minimal costs associated with adding participants, every person at a participating school will have a chance to answer the student survey. Thus, the electronic nature of the student survey provides the most efficient mechanism for the NEA to capture responses from students. Electronic surveys, and all communication about the survey will be compliant with Section 508 of the Rehabilitation Act.

In addition, this program evaluation is multi-modal and uses a mixed-method approach, such as triangulating administrative records with interviews and focus groups to build a comprehensive overview of the POL program, its implementation, and the impact it has on student outcomes. The study team will obtain administrative records from school districts

through data sharing user agreements, and also collect qualitative data at up to six schools via remote video- and tele-conferencing systems. All other data collection will be done in person.

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

There is no similar ongoing data collection being conducted that duplicates the efforts of the proposed data collection for the study. The current study is designed to complement but not duplicate the previous implementation evaluation study of the POL program conducted in 2008. The current evaluation study will be the first since 2008. As noted in the response to question 1, the prior implementation evaluation focused on the reach, support, and engagement with POL by students and participating schools. While there were some reported student-level outcomes related to poetry appreciation and engagement, these study findings are not assumed to be representative of POL participants in general since the evaluation engaged only state-level POL student champions. The current study, using a quasi-experimental design, is intended to produce findings about student-level outcomes across multiple domains (academic engagement and performance, social and emotional development, and poetry appreciation and engagement) when the program is implemented under optimal conditions. An exhaustive literature review conducted by the study team confirmed that there is little research on participation in poetry programs by high school students.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

There are no small business entities or other small entities involved in this data collection.

6. Describe the consequence to Federal program or policy activities if the collection is

not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing the burden.

This is a voluntary short-term study across one school year. This survey will provide the NEA with quantitative and qualitative measures to gain valuable insights into the relationships between the implementation of the POL program under optimal conditions and student level outcomes. Without this evaluation, the NEA will have no methods for analyzing and assessing the impact of its program and policy choices.

Conducting the collection less frequently or with fewer POL programs would not only impede the Agency's ability to track impact, but would also deprive students of an opportunity to learn more about the impact of their participation in POL.

7. Explain any special circumstances

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320.6 (Controlling Paperwork Burden on the Public-General Information Collection Guidelines). There are no special circumstances that require deviation from these guidelines.

The results will not be representative of the entire universe of states that are optimally implementing POL because within optimally implementing states there is a lot of variation of POL programs being implemented. Rather, results are representative of programs that have similar characteristics to the programs implemented by the schools included in the 10-school sample.

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

On Tuesday, April 6, 2017, a 60-Day Federal Register Notice was published at 73 FR 12746 Volume 82, No. 65. Number of comments received: 1.

8.a Consultations Outside the Agency

The study team conducted a literature review in advance of launching the study to determine what research existed on poetry education programs and research methods previously used to evaluate those programs. The study team also assembled a Technical Working Group to review and provide input on the study plan. TWG members include arts education researchers, arts organization administrators, and teachers. That group met in August 2017 on a 90-minute conference call to provide feedback to the study team on the evaluation plan. This working group will also provide feedback to the study team on the draft report.

Cognitive testing of the student survey was conducted in October to November 2017. Section B4 “Pre-Testing of Procedures” provides details on the pre-test of the survey instruments. See also **Attachment I**.

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

No payments or gifts will be given to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

At the beginning of the survey and all qualitative data collections, participants will receive written or verbal assurance that their participation is voluntary, that they can opt out at any time, that their responses will not be reported individually, and that their responses will never be linked to their individual responses. Researchers will combine all participant responses and report them in aggregate form only. The survey data set provided to NEA at the end of the study will not contain any personally identifying information (PII)—such as name or address of

respondents—that could permit disclosure or identification of respondents, directly or by inference. Data for subgroups with cell sizes lower than 10 will be redacted or suppressed.⁵

SPR will use Survey Gizmo to collect the pre- and post-student survey and will use the “Anonymous Response” feature to avoid storing identifiable information such as geo-location or IP addresses. Furthermore, as discussed in the Study Overview, the research team will not be collecting any PII within the survey. The “Anonymous Response” setting is compatible with email campaigns. When both of these two features are used together, Survey Gizmo will track which contacts have not yet completed the survey and send any reminders that you have set up to these contacts, but researchers have no visibility into this process and will not be able to tie survey responses to specific email addresses. Upon completion of the project, SPR will ensure the secure destruction of all data originally provided or collected, employing digital or physical shredding of electronic or physical data. When disposing of sensitive electronic data, SPR uses secure deletion software that overwrites disks to a minimum of 7 times for reusable media (USB drives and hard drives) and physical destruction (cross cut shredding) for non-reusable media (e.g., CD/DVDs).

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

Data on student gender, race/ethnicity, free and reduced lunch status, special education, and English learner status will be collected through this evaluation study. These data are collected to

⁵ <https://nces.ed.gov/pubs2011/2011603.pdf>

assess whether outcomes are affected by students' demographic characteristics. Race/ethnicity survey questions comply with OMB standards.

12. Provide estimates of the hour burden of the collection of information.

Participant Description	Instrument or Activity	Number Participants per site	Total Number of Participants across 10 sites	Average Hours per Response	Number of Responses per Person	Total Responses	Estimated Burden (Hours)
Students	Interviews	4	40	0.75	1	40	30
	Focus group	6	60	1	1	60	60
	Baseline (Pre) Surveys	1800	18000	0.25	1	18000	4500
	Follow-up (Post) Surveys	1440	14400	0.25	1	14400	3600
Parents	Consent	1800	18000	0.1	1	18000	1800
District Staff	Complete MOU	1	10	2	1	10	20
Administrators	Interviews	1	10	0.5	1	10	5
School/District Staff	Provide administrative data	2	20	8	2	40	320
School Staff	Coordinate survey distribution	1	10	8	1	10	80
Teachers	Interviews	2	20	0.75	1	20	15
TOTAL						50590	10430

Note that the burden estimate assumes every parent will review the passive consent letter sent home with students. Additionally, the research team is estimating between two to four individual student interviews, since the number of interviews may be affected by actual site visit schedules. Because four interviews are the desired amount, we have included this top-end estimate in the burden chart. Note also that the burden estimate for the student follow-up (post) surveys is based on the fact that only students responding to the pre-survey will be invited to participate in the follow-up survey. The response rate for the pre survey is estimated at 80%.

13. Provide an estimate for the total annual cost burden to respondents or record-keepers resulting from the collection of information

Research participants do not incur any costs other than their time responding.

14. Provide estimates of annualized costs to the Federal Government.

The total one-time contracted cost to the Federal Government for this project is \$360,000, representing an annualized cost of \$180,000 for a two-year project.

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

This is a new information collection request and will add 8,627 burden hours and 32,690 total annual responses to OMB's inventory.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

A.16.1 Recruiting Schools

After IRB and OMB approval, in approximately May 2018, the SPR research team will begin recruiting 10 schools to participate in the study, using a two stage recruitment strategy. First, NEA and State Art Agency officials will send principals and school district superintendents a letter of support (**Attachment B**) to encourage participation in the research and introducing SPR. The NEA and State Art Agency officials will use the draft letter, customizing it with relevant additional detail. Once the letter from NEA/SAA's has been sent to the school principals and school superintendents, in approximately June 2018, the research team will commence contacting schools. Next, the team will first contact school principals via email, modeled on **Attachment B**. The initial communication will contain key information about the study and will let principals know that the research team would like to schedule a 15-minute phone conversation, which serves as a screener to assess for appropriateness of the school as a study site. The purpose of the call is to briefly describe the purpose of the study and the research

activities we plan to undertake. The phone call will also be used to determine whether the selected school meets the necessary criteria for the study and find out if the principal would be willing to participate in the research activities. The phone call will include (1) the purpose of the study, (2) preview of school characteristics that would best fit the aims and needs of the study, (3) what the research team will be asking of schools, (4) what data the team will collect and (5) how the data will be used, and (6) benefits of participating in the study.

Once we assess the school site information and determine which schools meet the criteria for the study, the research team will then contact the school superintendent's office using a similar process as the one followed with the school principals. The main goal of communicating with the school district officers is to obtain additional information and determine school site eligibility which also includes establishing data sharing agreements (**Attachment C**) to access de-identified student-level data with some and make sure we follow the research protocol in school sites within the district.

A.16.2 Student Surveys

The research team will conduct online pre- and post-surveys (**Attachment D**) for all students in the 10 selected schools during SY2018-19, both participants in POL and non-participants. Pre surveys will be administered in July – September 2018 and post surveys will be administered in April – June 2019.

A.16.3 Student Records

The research team will collect student-level administrative records in July 2019 from the selected schools, per the data sharing agreements with each of the school districts. Data will be

collected for all students enrolled in the schools selected for the study. The data will include the following and in a standardized format:

1. Unique identifiers for all students (student proxy id generated by the school district);
2. Participation in POL identifier for current and prior academic year;
3. Student-level demographic information (e.g., gender, race/ethnicity, free and reduced lunch status, special education, English learner);
4. Grade level;
5. Relevant assessment data in English Language Arts and language proficiency tests for school year (SY) 2018-19 and if applicable one prior school academic year (SY2016-17); GPA and ELA end-of-course grades; and
6. Student-level records of attendance, suspensions, and expulsions.

A.16.4 School Site Visits, including Virtual Site Visits

The research team will make either day-long site visits or virtual site visits to each of the schools between January and May 2019. Data will be collected through: (1) semi-structured interviews following a prepared interview protocol with POL-participating students **(Attachment E)** and teachers **(Attachment F)**; state arts agency administrators will be interviewed by phone prior to the site visit, also following a prepared protocol **(Attachment G)**; and (2) focus groups with POL-participating students following a prepared protocol **(Attachment H)**.

A.16.5 Data Analysis and Report

After data collection is complete, in July 2019, all quantitative and qualitative data will be analyzed and a final evaluation report will be prepared. The report will be submitted in November 2019. Supplemental publication products, at NEA's request, will be submitted in December 2019. These may include graphic fact sheets, power point slides summarizing the

study findings, selected quotes from educators regarding POL, and/or interview transcripts and other raw data.

Monthly reports will be submitted about study progress throughout the entire study period. **Exhibit A.16** outlines the schedule for data collection and reporting.

Exhibit A.16 Study Schedule

Activity	Expected Activity Period
Recruit Schools	May - August 2018
Train site visit researchers	1 month after OMB approval
Conduct Pre-Test Surveys	September – November 2018
Conduct site visits	January – May 2019
Conduct Post-Test Surveys	April – June, 2019
Data analysis	July – September 2019
Final Report	November 2019

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

NEA will display the expiration date of OMB approval and OMB approval number on all instruments associated with this information collection, including forms and questionnaires.

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

No exceptions are necessary for this information collection. The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.