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Study of State Policies to Prohibit Aiding and Abetting Sexual Misconduct in Schools

Task 3.5 Third Draft OMB Package: Section B, Collections of information employing statistical methods

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B. Collections of information employing statistical methods

1. Respondent universe and selection methods

For the United States Department of Education, Office of Elementary and Secondary Education (OESE) a study team from SRI International (SRI) and research partners from Policy Studies Associates (PSA) and Magnolia Consulting will conduct interviews with state education officials from all 50 states, the District of Columbia, and island territories to understand the extent to which states have statutes, regulations, or policies that address Section 8546 under the *Every Student Succeeds Act*. The study team will identify one individual—or a group of individuals—in each state education agency (SEA) most knowledgeable about the state’s statutes, regulations, or policies. Exhibit 1 below provides the universe of state-level respondents, the number of respondents that will be selected to participate, and the expected response rate. The study team expects to collect data from all 50 states, the District of Columbia, and the five island territories, with a response rate of 90 percent or higher.

Exhibit 1. Universe of respondents and sample selection

Data collection activity	Universe of respondents	Sample selection	Expected response rate
Telephone interview, SEA official	~56 SEA officials knowledgeable about the state’s statutes, regulations, or policies that address ESSA Section 8546	Universe (~56 SEA officials)	≥ 90 percent

2. Procedures for the collection of information

The following describes the procedures for the collection of information.

- Collect contact information for SEA interviews respondents.** To identify the appropriate state interview respondents, analysts will start by updating contact information for state coordinators of the Title IV, Part A Student Support and Academic Enrichment grants program based on a review of all SEA websites, including the District of Columbia and the island territories.
- Send email invitation to state Title IV Coordinators.** After contact information has been collected, the study team will send an introductory email to every state Title IV, Part A Coordinator that describes the study, including its importance, purposes, and products, and invites them to participate in a 60-minute telephone interview. The email will also provide an overview of the data collection plan; provisions for maintaining the confidentiality of participants and data security; and a list of interview topics. The email will ask SEA officials: (1) whether they are the most knowledgeable SEA respondent on the topics relevant to the study, (2) whether they wish to involve multiple individuals with relevant knowledge and responsibilities in the interview, and (3) whether they wish to refer us to other SEA

administrators who are more knowledgeable about state legislation, regulations, and policies that meet the requirements of ESSA Section 8546. The email will include a request for a 60-minute interview with the identified respondent or respondent group most knowledgeable about the study topics. In addition, the email will include a copy of the letter sent to the Chief State School Officer (CSSO) notifying them of the study and requesting their state's cooperation (the notification letter is described below), the interview protocol (see Appendix C), and a one-page study overview (see Appendix D).

- **Conduct telephone interviews with state officials.** After identifying a respondent or group of respondents from each state, the study team will schedule one 60-minute interview with the respondent or respondent group. Members of the study team will use a semi-structured interview protocol to collect information about the state's approach to developing and implementing statutes, regulations, and policies to respond to Section 8546 as well as challenges that the state has encountered through this process.

3. Methods to maximize response rates and to deal with issues of nonresponse

To solicit participation for SEA officials, the study team will engage in a two-step process. First, the study team will prepare hardcopy notification letters and information packets about the study for Chief State School Officers in all 50 states, the District of Columbia, and island territories. The letters will be signed by leadership from the Office of Elementary and Secondary Education and include a study description with a discussion of its importance, purposes, and products; specific information on the data collection schedule and plans; provisions for maintaining the confidentiality of participants and data security; the organizations and staff involved in the study; and the benefits to be derived from the study. The notification letter mailed from OESE will strike an appropriate balance between communicating the mandate for participation and reassuring states that OESE does not intend to publish a report that analyzes individual states' policies or practices. Finally, the letter will include the names and phone numbers of the Department staff and study team members who can answer questions about the study. The notification letter can be found in Appendix A.

One week after sending notification letters, the study team will contact prospective interview candidates by email to describe the study and request an interview. The email will ask the state Title IV, Part A Coordinators to confirm that they are the SEA employee most knowledgeable about state statutes, pending legislation, regulations, and policies that prohibit aiding and abetting sexual misconduct. The email will include a copy of the letter to the CSSO, the interview protocol, and a one-page study overview. If the candidate seems unsure, members of the study team will ask the candidate to refer the study team to others in the SEA who might be able to respond to questions about the state's laws and policies that prohibit aiding and abetting sexual misconduct. The study team will continue emailing until they find one individual—or group of individuals—in each state most knowledgeable about the state's response to the requirements of ESSA Section 8546. The study team will then send a confirmation e-mail and schedule an interview with the respondent(s) for each state.

As necessary, the study team will follow-up with prospective respondents and confirmed respondents to schedule interviews. To maximize participation, the study team will work with state Title IV coordinators and other relevant state officials to develop a telephone interview schedule that maximizes the study team's time with state staff while minimizing burden.

Interviewers will wait one week for a response after sending the initial email in Appendix B. After one week of non-response, interviewers will send a follow up email. After three more days of non-response, the interviewer will send a second follow-up email, asking to be referred to others in the SEA who might know about state laws and policies prohibiting aiding and abetting employment. Two days after that, the analyst will call the SEA and ask to speak to the selected state official. If the interviewer is still unsuccessful after leaving two voicemail messages, the study director will ask OESE staff to contact non-respondents directly and request their participation in the study.

The study team will complete interviews by June 2020, with a goal of at least a 90 percent response rate.

4. Tests of procedures or methods to be undertaken to minimize burden and improve utility

After refining the interview protocols using initial feedback from OESE on the first draft, the interview protocol was pilot-tested with a purposively selected sample—developed in consultation with OESE—of three state officials and revised based on the testing. The study team selected states for the pilot test sample based on a range of state characteristics, including the following:

- Range in number of required employment practices intended to prohibit or inhibit behaviors recognized to contribute to aiding and abetting individuals engaged or allegedly engaged in sexual misconduct (e.g., many and few)
- Geographic diversity
- Size (i.e., states with many and few schools)

Study team members asked pilot respondents to provide feedback on the extent to which the protocol questions were: (1) confusing, inappropriate, or leading; (2) illogically sequenced; or (3) unreasonably burdensome to answer. In addition, pilot respondents provided feedback on whether the protocol questions were relevant to understanding state efforts to respond to *ESSA* Section 8546.

Pilot respondents' feedback was very positive; all believed the protocol was clear, followed a logical order, was not unreasonably burdensome, and asked relevant questions about SEA responses to the requirements of Section 8546. The study team made a few minor changes to the protocol based on pilot respondents' feedback, including: (1) referencing, where relevant, other agencies, organizations, and boards that may be involved in developing policies that address the requirements of Section 8546; and (2) adding a question about the types of support and assistance SEAs need from OESE in order to respond to the requirements of Section 8546. Finally, pilot respondents verified that the information can be collected in approximately 60 minutes.

5. Names and telephone numbers of individuals consulted on statistical aspects of the design and the names of the contractors who will actually collect or analyze the information for the agency

SRI is the contractor with primary responsibility for the study, in collaboration with PSA and Magnolia consulting. Ms. Leslie Anderson is the Project Director. Mr. Derek Riley will lead data collection and analysis for interviews. Katrina Laguarda is the Deputy Project Director and Stephanie Wilkerson is the

study's Senior Advisor. Exhibit 1 lists the information requested for the staff responsible for collecting and analyzing the study data.

Exhibit 1. Staff responsible for collecting and analyzing study data

Name	Project role	Organization	Phone number
Leslie Anderson	Task Order Project Director	PSA	202-939-5327
Derek Riley	Senior Researcher	PSA	202-939-5304
Katrina Laguarda	Deputy Director	SRI	703-247-8445
Stephanie Wilkerson	Senior Advisor	Magnolia	434-984-5540