

SUPPORTING STATEMENT - PART A

High School Recruiter Study – 0704-XXXX

1. Need for the Information Collection

The Office of the Under Secretary of Defense for Personnel and Readiness has funded a RAND study to assess the level of access and cooperation recruiters currently experience with schools from around the country, identify high school practices and school/school district policies that may facilitate or hinder recruiter access and provide recommendations to OSD on how to improve current recruiter practices and high school compliance.

In order to achieve this goal, RAND will collect qualitative data/information from high school districts (LEAs), high school administrators (e.g. principals or vice principals) and high school counselors to examine ways to improve recruiter access to high schools.

The qualitative data collection from public stakeholders mentioned above is one component of the study. Other components do not require OMB approval. They include interviews of recruiters from the services (Military, Navy, Marines and Air force) and their supervisors, and analysis of publicly available datasets from the Department of Education American Community Survey, as well as recruiter access dataset collected by JAMRS.

2. Use of the Information

The study will be concentrated in four states including California, Pennsylvania, Ohio and Florida.

- We will select six pairs of public high schools in each state. Each pair will include two high schools that are similar in demographics, but one provided full access to recruiters while the other provided either no or limited access.
- The study will interview school district (LEA) administrators overseeing recruiter access at the high schools, high school administrators (either principal or vice principal) and high school counselors.
 1. To provide OSD with the recommendations for improving recruiter access to high schools, the study would need to collect its own data on practices, and facilitators and barriers to high school access.
 2. The data collection instruments are attached. The instruments list the questions. The instruments will be implemented by RAND researchers through face-to-face or phone individual interviews. Each interview will take between 45 to 60 minutes.

3. RAND will be conducting face-to-face or telephone individual interviews to collect the data. Information technology will not be used for interview data collection.
4. RAND will be conducting face-to-face or telephone individual interviews to collect the data. RAND will be asking questions included in the instrument (see attached documents). Participation is voluntary. Participants can choose not to do the interview or skip any question they would prefer not to discuss.
5. The data collection will be conducted through one-on-one interviews. RAND will be taking notes during the interview. The respondent would not return the instrument.
6. We provide a sample of the e-mail inviting LEA and high school stakeholders to participate in the study.
7. The qualitative data will be collected and analyzed by RAND project researchers.
8. RAND will use the qualitative data to assess the level of recruiter access and nature of cooperation with high schools, as well as to identify LEA/high school practices and other factors that hinder and or facilitate access. This information will be added to interviews conducted with DoD recruiters and their supervisors. RAND's analytic work will be used by decision-makers at OSD to decide on how to improve recruiter access to high schools and the process for gaining compliance from non-compliant schools.

3. Use of Information Technology

RAND will be conducting face-to-face or telephone individual interviews to collect the data. Information technology will not be used for interview data collection.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities. The respondents are school districts (LEAs) and high school administrators and counselors. In this context, efforts to minimize any burden imposed by data collection are not applicable.

6. Less Frequent Collection

RAND is collecting data from LEA/high schools once during the study period; as a result data collection cannot be decreased. Each interview is expected to last between 45 to 60 minutes.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Thursday, March 18, 2021. The 60-Day FRN citation is 86 FR 14741 FRN 14741.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Monday, June 14, 2021. The 30-Day FRN citation is 86 FR 31489 FRN 31489-31490.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

A Privacy Act Statement is not required for this collection because we are not requesting individuals to furnish personal information for a system of records.

A System of Record Notice (SORN) is not required for this collection because records are not retrievable by PII.

A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

As indicated earlier, RAND researchers will conduct interviews with school district (LEA) administrators overseeing recruiter access at the high schools, high school administrators (either principal or vice principal), and high school counselors. RAND will be reporting interview information at the aggregate level within each state and across the four states. In their reporting RAND will paraphrase responses but will not associate comments with a specific LEAs or high schools. In addition, prior to the interview RAND will inform each

participant that they can refuse to answer any question and keep some statements confidential. It is important to point out, however, that the questions do not address sensitive topics. Questions will ask participants to provide information about their approaches to recruiter access, activities implemented, communication and relationship between high schools and recruiters, and barriers and facilitators to accessing schools.

In addition, to increase confidentiality, participant names will not be recorded in the same file as the interview responses (whether recorded by handwriting or direct typing on RAND computer). Names and contact information will be recorded in a separate crosswalk file. A coding system will be used that will enable the RAND researcher to identify the respondents, without having their names attached to any piece of data. This code will be used in place of personal identifiers on all transcripts. The crosswalk file that links the interview notes to respondents will also have a file access password and be stored on the project leaders' computers, separate from any interview notes. Further, interview notes if handwritten will be hand carried by research staff between meeting locations and the RAND office and kept in locked file cabinets in project staff offices. As soon as practical, project staff will transcribe any handwritten notes into electronic notes and destroy the handwritten notes. The electronic interview notes will be stored on the RAND project team's computers or shared project folder that only RAND project team has access to.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instrument(s)

[High School Recruiter Study]

- a) Number of Respondents: 84
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 1
- d) Response Time: 1 hour
- e) Respondent Burden Hours: 1

2) Total Submission Burden

- a) Total Number of Respondents: 84
- b) Total Number of Annual Responses: 1
- c) Total Respondent Burden Hours: 1

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

[High School Recruiter Study]

- a) Number of Total Annual Responses: 84
- b) Response Time: 1 hour
- c) Respondent Hourly Wage:
 - High school principal/vice principal: \$45
 - High school counselor: \$27
 - LEA administrator: \$77
- d) Labor Burden per Response:
 - High school principal/vice principal: \$45
 - High school counselor: \$27
 - LEA administrator: \$77
- e) Total Labor Burden
 - High school principals/or vice principals: \$2,160
 - High school counselors: \$648
 - LEA administrators: \$924

2) Overall Labor Burden

- a) Total Number of Annual Responses: 84
- b) Total Labor Burden: \$3,780

The Respondent hourly wage was determined by using the Bureau of Labor and Statistics and Burning Glass.

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

1) Collection Instrument(s)

[High School Recruiter Study]

- a) Number of Total Annual Responses: 84
- b) Processing Time per Response: 0
- c) Hourly Wage of Worker(s) Processing Responses : \$0
- d) Cost to Process Each Response (*P: B multiplied by C*): \$0
- e) Total Cost to Process Responses (*P: A multiplied by D*): \$0

2) Overall Labor Burden to the Federal Government

- a) Total Number of Annual Responses: 84
- b) Total Labor Burden: \$0

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
 - a) Equipment: \$0
 - b) Printing: \$0
 - c) Postage: \$0
 - d) Software Purchases: \$0
 - e) Licensing Costs: \$0
 - f) Other: \$0

2) Total Operational and Maintenance Cost: \$0

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$0
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government (P: Add 1 and 2 in this section): \$0

15. Reasons for Change in Burden

This is a new collection with a new associated burden.

16. Publication of Results

Data collection is estimated to start in August 2020 and end in August 2021. The report will be completed in draft form in January 2022 and published in July 2022.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.