

Response to Second Set of OMB Comments:

An Experimental Study of The Project CRISS Reading Program On Ninth Grade Reading Achievement in Rural High Schools

October 19, 2007

OMB Comment

1. Focus on rural white children: On page 2 of part A, the supporting statement says that "most [studies of CRISS] have been conducted on middle class or lower middle class students who are primarily white": this study appears to be studying the impact of CRISS on the same or similar demographic. However, the supporting statement is written so as to imply that the study will focus kids with the highest needs: there seems to be discrepancy here.

Relatedly, ED says in the Qs and As that "It is reasonable to expect that implementing Project CRISS across many teachers in a large departmentalized urban high school is more difficult than in smaller rural schools with more teacher collaboration."

The study seems to have been designed to show as big an impact as possible for this intervention, arguably not focusing on highest need kids. (In fact, this study will be including schools with higher income demographics than schools previously studied). Please clarify the supporting statement to acknowledge this issue.

Response

The following paragraph is added to page 3 of Part A, just before the research questions, to clarify the issues and concerns stated above; Part A is resubmitted.

This study has a specific focus on Northwest high schools in rural areas with relatively fewer services and where poverty can be pervasive due to economic downturns in many rural communities. Project CRISS is a promising but unproven intervention with this population based on previous developer studies. The developer stresses that Project CRISS works to build the reading comprehension skills of all students when teachers across a school implement the strategies in all core content classes in English language arts, mathematics, science, and social science. Project CRISS is not designed as a special program or "pull out" program for high-need students or only for teachers who work with high-need populations. Therefore, the study is designed to show the impact of the Project CRISS intervention when it is provided to all core subject teachers in rural high schools. We have worked with the developer to define the intervention as it occurs in high schools they typically work with.

OMB Comment

2. Sample Size/Burden: In item 5, ED suggests that if more than the target number of schools agree to participate, ED could increase the sample. Under the PRA, this cannot be done as it would be increasing the burden beyond what was approved.

Response

If we achieve a slightly higher than one-third participation rate (which will yield about 66 schools), we will need to admit schools on a first come-first serve basis. In our recruitment, we will be dealing with all states simultaneously over a period of time to contact schools, present Project CRISS and the study, and gain support. This should reduce any bias by state or poverty level in the unlikely event that we end up with too many interested schools. We will cap the sample at 66 schools so as not to increase the burden beyond that which is approved.

OMB Comment

3. Appendix K (parental consent form): Please cite the Education Services Reform Act confidentiality citation, which is stronger and more global than the other statutes cited. Also, the standard language that should be used is:

"Responses to this data collection will be used only for statistical purposes. The reports prepared for this study will summarize findings across the sample and will not associate responses with a specific district or individual. We will not provide information that identifies you or your district to anyone outside the study team, except as required by law."

In addition to this language, the law should be cited here, in a footnote, or somewhere else "close by."

Response

Appendix K is so modified and resubmitted.