

SUPPORTING STATEMENT
Part A

NATIONAL CENTER FOR EDUCATION STATISTICS

PRIVATE SCHOOL UNIVERSE SURVEY
July 2010—June 2013

OMB # 1850-0641

SUPPORTING STATEMENT
TABLE OF CONTENTS

A. JUSTIFICATION

A1.	Why Is This Information Needed?	3
A2.	Purposes and Uses of the Data	4
A3.	Appropriate Use of Information Technology	4
A4.	Efforts to Identify Duplication	4
A5.	Small Business or Entities	5
A6.	Frequency of Data Collection	5
A7.	Special Circumstances of Data Collection	5
A8.	Consultations Outside the Agency	5
A9.	Payment or Gifts to Respondents	8
A10.	Assurance of Confidentiality	8
A11.	Need for the Use of Sensitive Questions	8
A12.	Estimates of Information Collection Burden	8
A13.	Capital and Operating Costs to Respondents	10
A14.	Estimates of Cost to the Federal Government	10
A15.	Changes in Burden	10
A16.	Publication Plans/Time Schedule	10
A17.	Request Not to Display Expiration Date	11
A18.	Exceptions to the Certifications	11

B. Collection of Information Employing Statistical Methods

B1.	Respondent Universe	2
B2.	Procedures for Data Collection—Statistical Methods, Estimation Procedures, Accuracy, and Anticipated Problems	2
B3.	Methods for Maximizing Response Rates	2
B4.	Test of Procedures and Methods	3
B5.	Statistical Consultants, Agency Staff, and Contractors	3

C. Item Justification

- Appendix A. State List Request Letter
- Appendix B. Association List Request Letter
- Appendix C. Telephone Script
- Appendix D. PSS Questionnaire
- Appendix E. Examples of Table Shells

Request for Clearance for the Private School Universe Survey

This is a request for clearance to conduct the Private School Universe Survey (PSS) from July 1, 2010, until June 30, 2013. The 2011-12 PSS frame-development activities and data collection, and the 2013-14 PSS frame-development activities are covered by this time period. There are no substantive changes to the 2011-12 PSS survey and procedures as compared to the last approved 2009-2010 PSS collection. The only change made is that in 2009-10, schools were asked for their email and school website address as part of the school contact information item. Due to very low response rates (and many of the e-mail addresses being for personal email accounts), these items were dropped from the 2011-12 survey.

A. JUSTIFICATION

A1. Why Is This Information Needed?

The Elementary/Secondary Sample Survey Studies Program of the National Center for Education Statistics (NCES), U.S. Department of Education, requests the use of the PSS to conduct a national survey of private elementary and secondary schools. This data collection activity is designed to gather biennial data on the total number of private schools, teachers, and students; and create an NCES universe frame of private schools that can be used as a sampling frame for NCES surveys of private schools. This survey is an ongoing project to improve NCES universe and sample data on private schools.

Since 1980, NCES has annually collected descriptive universe data on the number of public school teachers, students, and high school graduates through the NCES Common Core of Data (CCD) for the public schools. Private schools represent approximately 25 percent of all elementary and secondary schools in the United States and enroll an estimated 10 percent of the nation's elementary and secondary students. With increasing policy concern about choice and alternatives in education, the interest and need for data on private education has also increased. NCES has recognized this need and has determined that the collection of data on private schools be comparable to public school data is an NCES priority.

In 1989, NCES established an Interagency Agreement with the U.S. Census Bureau to collect and process private school data. The PSS was conducted in 1989-90, 1991-92, 1993-94, 1995-96, 1997-98, 1999-2000, 2001-02, 2003-04, 2005-06, and 2007-08, and the data have been released. The 2009-10 PSS data are presently being collected.

NCES is conducting this survey, as authorized under Public Law 107-279, Title I, Part C, Section 151(b) and 153(a) of the *Education Sciences Reform Act of 2002*:

“The Statistics Center shall collect, report, analyze, and disseminate statistical data related to education in the United States and in other nations, including collecting, acquiring, compiling (where appropriate, on a state-by-state basis), and disseminating full and complete statistics ... on the condition and the progress of Education, at the preschool, elementary, secondary, postsecondary, and adult levels in the United States...”

A2. Purpose and Uses of the Data

NCES has conducted several national sample surveys of private elementary and secondary schools beginning in the 1970s. Recently, Schools and Staffing Surveys (SASS) for 1987-88, 1990-91, 1993-94, 1999-2000, 2003-04, and 2007-08 provided estimates of the numbers and characteristics of private schools, teachers, and students for comparison among private schools and with public schools. With successive administrations of SASS, detailed trend data on private schools will be established. However, there is also a need for biennial data on a limited number of key statistics and a need to update the private school sampling frame for the openings and closings of private schools every several years.

Except for previous PSS, the sampling frames available for private school surveys have not been timely nor have they provided complete coverage. Commercial lists, such as those developed by QED, are not complete and lack sufficient detail on school characteristics to select samples per NCES specifications. Lists maintained by organizations of private schools are also incomplete because they only contain listings of their member schools. The purposes of this project are, therefore, to: 1) generate biennial data on the total number of private schools, teachers, and students; and 2) build an NCES universe frame of private schools that is of sufficient accuracy and completeness to serve as a sampling frame for NCES surveys of private schools.

A3. Appropriate Use of Information Technology

Imaging and CATI

Information technology will be used in several ways for the 2011-12 PSS collection. As in the 2003-04, 2005-06, 2007-08, and 2009-10 PSS collections, the data from all paper questionnaires will be imaged and stored electronically. And, as in all previous PSS collections, CATI follow-up will be used in 2011-12 for mail/internet nonrespondents (an estimated 30 percent of all responses will be collected by CATI).

Internet Data Collection

The 2011-12 PSS, like the 2005-06 and 2009-10 PSS, will offer an internet response option to most schools (Amish and Mennonite schools will not be offered an internet response option).

A4. Efforts to Identify Duplication

One of the criteria for PSS is to collect only data that are not available elsewhere. The Elementary/Secondary Sample Survey Studies Program reviewed existing private school data collection efforts and found no other private school data collection effort existing or planned that will update the private school universe.

A5. Small Business or Entities

The PSS collects data from elementary and secondary private schools. Private schools are small entities. The respondent burden is minimal because of the limited questionnaire size (22 items) and because the data that are being collected are readily available from the administrative files of most private elementary and secondary schools.

A6. Frequency of Data Collection

The current plan is to conduct the PSS for the entire private school universe biennially. If the PSS were collected less frequently, NCES would be forced to use sampling frames with significantly poorer coverage for its surveys of private schools.

A7. Special Circumstances of Data Collection

There are no circumstances that will require special data collection efforts.

A8. Consultations Outside the Agency

Key offices inside the U.S. Department of Education have reviewed the draft survey. Prior to the first PSS in 1989-90, NCES discussed its data collection plans with a number of private school associations. Representatives from the following private school associations participated in these initial discussions.

<u>Association</u>	<u>Contact</u>
Accelerated Christian Education	Dr. Donald Howard
Agudath Israel of America	Rabbi Morton Avigdor
American Association of Christian Schools	Dr. Robert Stashesky
American Montessori Society	Ms. Bretta Weiss
Association of Christian Schools International	Dr. John Holmes
Association of Evangelical Lutheran Churches	Mr. Kretzman
Association of Military Colleges and Schools	Lt. General Willard W. Scott
Christian Schools International	Dr. Sheri D. Haan
Council for American Private Education	Ms. Joyce McCray

Evangelical Lutheran Church in America	Mrs. Billie Navarro
Friends Council on Education	Ms. Kaye Edstene
General Conference of Seventh Day Adventists	Dr. G. L. Plubell
Jesuit Secondary Education Association	Rev. Carl E. Meirose
Lutheran Church, Missouri Synod	Mr. Carl Moser
National Association of Episcopal Schools	Ms. Ann Gordon
National Association of Independent Schools	Dr. Peter Relic
National Association of Private Schools for Exceptional Children	Ms. Sherry L. Kolbe
National Catholic Educational Association	Mr. Frederick Brigham
National Coalition of Alternative Community Schools	Ms. Pat Montgomery
National Independent Private School Association	Ms. Carolyn Crider
National Society of Hebrew Day Schools	Rabbi Fishman
Oral Roberts Educational Fellowship	Dr. David Hand
Solomon Schechter Day Schools	Mr. Meir Efrati
U.S. Catholic Conference	Father William Davis
Wisconsin Evangelical Lutheran Synod	Dr. Daniel Schmeling

Since the 1989-90 PSS, private school group meetings have been held annually with affiliation representatives to inform them of the PSS status. Except for formatting, the PSS questionnaire has undergone only minor changes since the last meeting, which was held in November 2009.¹ The following private school groups were represented at the November 2009 meeting:

¹ The only change made is that in 2009-10, schools were asked for their email and school website address as part of the school contact information item. Due to very low response rates (and many of the email addresses being for personal email accounts), these items were dropped from the 2011-12 survey.

American Association of Christian Schools	Jennifer Groover
Association of Christian Schools International	John Holmes, Ken Smitherman
Association of Christian Teachers and Schools	R. J. Nelson
Association of Military Colleges and Schools	Rudolph Ehrenberg, Jr.
Association of Waldorf Schools of North America	Sarah Dinan
Council for American Private Education	Joseph McTighe
Jewish Education Service of North America	Steven Kraus
Lutheran Church-Missouri Synod	Gene Ladendorf
National Association of Independent Schools	Amada Torres
National Catholic Educational Association	Dale McDonald
National Christian School Association	Philip Patterson
National Coalition of Alternative Community Schools	Pat Montgomery
National Independent Private School Association	Allen Blau
Oral Roberts University	David Hand
Oral Roberts University Education Fellowship	Donnie Peal
U.S. Conference of Catholic Bishops	Suzanne Bellenoit
Wisconsin Evangelical Lutheran Synod Schools	Scott Gostchock

A9. Payment or Gifts to Respondents

Not applicable.

A10. Assurance of Confidentiality

The law does not require disclosure protection of institutions, such as schools; therefore, no assurance of confidentiality is provided to respondents. Also, because there is minimal risk that respondent cooperation from private schools may be adversely affected by the information requested, the information collected in the PSS is not considered to be sensitive.

A11. Need for the Use of Sensitive Questions

The questions contained in this survey—grade levels taught, length of the school day and school year, religious orientation, type of school, number of teachers, enrollment, race/ethnicity of students, and number of graduates—are not considered to be sensitive.

A12. Estimates of Information Collection Burden

2011-12 PSS

During the development of the list-frame portion of the 2011-12 PSS universe (see Part B section 2), lists of private schools will be requested and received from approximately 100 state agencies and private school associations. It is estimated that each list response will take an hour, resulting in 100 hours of respondent burden. Approximately 6,600 screener calls will be made to new institutions discovered in the list-frame operation to determine their eligibility for the PSS. The average length of these calls is 3 minutes, resulting in 330 hours of respondent burden for the list-frame screener operation. The total response burden for list-frame development is 430 hours.

Approximately 8,000 screener calls will be made to institutions discovered in the area-frame operation to determine their eligibility for the PSS. The average length of these calls is 3 minutes, resulting in 400 hours of respondent burden for the area-frame screener operation. The total response burden for 2011-12 PSS frame development is 830 hours (430 hours for the list-frame and 400 hours for the area-frame).

Survey questionnaires will be sent to all of the cases on the 2011-12 universe.² The requested data can be easily obtained from school records. The average completion time will be 19 minutes (based on the 2007-08 PSS experience) per respondent (26,200), for a total of 8,297 hours of questionnaire respondent burden. The total respondent burden for the 2011-12 PSS, frame development (830) plus questionnaire (8,297), burden is 9,127 hours.

Table of 2011-12 PSS Data Collection Instruments

² The PSS and the Schools and Staffing Survey (SASS) are both being collected during 2011-12. To reduce respondent burden, the private schools in the 2011-12 SASS sample will receive the SASS private school questionnaire only and not the 2011-12 PSS questionnaire. PSS records for these schools will be created electronically from the SASS private school file. The respondent burden hours for these schools are included in the 2011-12 SASS burden hours.

Document Type	Instrument File	Respondent	Burden Time	Total Burden Hours	Available Electronically	Can be Submitted Electronically	Percent Responding Electronically	Electronic Capability	Obligation to Respond	Affected Public
State School List Request Letter	Appendix A PSS2010-13 State List Request Letter.doc	70	60 min	70	NO	YES	90 %	Electronic and Paper Versions	Voluntary	State Agencies (Education, Social Services, Child Care)
Association School List Request Letter	Appendix B PSS 2010-13 Assoc List Request Letter.doc	30	60 min	30	NO	YES	50 %	Electronic and Paper Versions	Voluntary	Private School Associations
Telephone Script	Appendix C PSS 2010-13 Phone Script.doc	14,600	3 min	730	NO	NO	0 %	Telephone Only	Voluntary	Private Schools
PSS Questionnaire	Appendix D PSS 2010-13 Questionnaire.pdf	26,200	19 min	8,297	YES	YES	25 %	Electronic and Paper Versions	Voluntary	Private Schools
Total		40,900 responses		9,127			24 %			

The standard NCEs procedure for estimating costs to school staff is to multiply the estimated total survey reporting hours (9,127) by the average salary of school employees (estimated to be \$20.00 per hour). Following these conventions, the “cost” to the respondents is estimated to be about \$182,540 for the 2011-12 PSS.

2013-14 PSS

During the development of the list-frame portion of the 2013-14 PSS universe (see B2 below), lists of private schools will be requested and received from approximately 100 state agencies and private school associations. It is estimated that each list response will take an hour, resulting in 100 hours of respondent burden. Approximately 6,600 screener calls will be made to institutions discovered in the list-frame operation to determine their eligibility for the PSS. The average length of these calls is 3 minutes, resulting in 330 hours of respondent burden for the list-frame screener operation. Total response burden for 2013-14 PSS list-frame development and for 2013-14 PSS activities covered by this clearance is 430 hours.

Table of 2013-14 PSS Data Collection Instruments

Document Type	Instrument File	Respondent	Burden Time	Total Burden Hours	Available Electronically	Can be Submitted Electronically	Percent Responding Electronically	Electronic Capability	Obligation to Respond	Affected Public
State School List Request Letter	Appendix A PSS2010-13 State List Request Letter.doc	70	60 min	70	NO	YES	90 %	Electronic and Paper Versions	Voluntary	State Agencies (Education, Social Services, Child Care)
Association School List Request Letter	Appendix B PSS 2010-13 Assoc List Request Letter.doc	30	60 min	30	NO	YES	50 %	Electronic and Paper Versions	Voluntary	Private School Associations
Telephone Script	Appendix C PSS 2010-13 Phone Script.doc	6,600	3 min	330	NO	NO	0 %	Telephone Only	Voluntary	Private Schools
Total		6,700 responses		430			18 %			

The standard NCEs procedure for estimating costs to school staff is to multiply the estimated total survey reporting hours (430) by the average salary of school employees (estimated to be \$21.00 per hour). Following these conventions, the “cost” to the respondents is estimated to be about \$9,030 for the 2011-12 PSS list-frame development.

A13. Capital and Operating Costs to Respondents

Respondents will not incur any costs other than their time to respond.

A14. Estimates of Cost to the Federal Government

2011-12 PSS

NCES estimates that the total federal cost for the 2011-12 PSS is approximately \$3,300,000 (\$303,676 in fiscal year [FY] 2010, \$1,300,096 in FY 2011, and \$1,696,228 in FY 2012). This estimate was compiled from individual estimates developed within each U.S. Census Bureau division involved in the survey. Estimates were based on the universe size, the length of the questionnaire, and required data processing. Administrative overhead, design, printing, and mailing costs were included.

2013-14

NCES estimates that the total federal cost for the 2013-14 PSS is approximately \$3,465,000 (\$318,860 in FY 2012, \$1,365,100 in FY 2013, and \$1,781,040 in FY 2014). This estimate was compiled from individual estimates developed within each U.S. Census Bureau division involved in the survey. Estimates were based on the universe size, the length of the questionnaire, and required data processing. Administrative overhead, design, printing, and mailing costs were included.

A15. Changes in Burden

The burden associated with the 2011-12 PSS data collection (9,127 hours) is somewhat more than that of the 2009-10 PSS (8,467 hours). The length of the screener calls during frame development is revised upward from 2.5 minutes to 3 minutes for 2011-12. The estimated completion time for the questionnaire is revised upward from 18 minutes (based on the 2005-06 PSS) to 19 minutes (based on the 2007-08 PSS). Total response burden for 2013-14 PSS list-frame development by this clearance is 430 hours, the same as the 2011-12.

The decrease shown in the annual burden hours on 83-I is due to the previous reporting being done for all three years summed, while the numbers provided in this package are annual, per instructions.

A16. Publication Plans/Time Schedule

2011-12 PSS

The first mailing of questionnaires is scheduled for September 26, 2011. A second mailout for schools that did not respond to the first mailout is scheduled for November 2011. Telephone follow-up for nonresponse will begin in January 2012. Personal visit follow-up for mail/internet noninterviews and CATI noninterviews is scheduled for January 2012 through May 2012.

The 2011-12 PSS survey will be conducted according to the following time schedule:

- | | | |
|-----|---|--------------------|
| 1. | Obtain OMB approval for the PSS | 7/1/2010 |
| 2. | Request Private School Lists | 7/20/2010 |
| 3. | Conduct Screener Calls for List-Frame Schools | 8/16/2010-5/2/2011 |
| 4. | Conduct Screener Calls for Area-Frame Schools | 9/1/2011-9/30/2011 |
| 5. | 1st Survey Mailout | 9/26/2011 |
| 6. | 2nd Survey Mailout | 11/2011 |
| 7. | CATI/Field Followup | 1/2012-5/2012 |
| 8. | Check-in, Clerical Edit | 9/2011-5/2012 |
| 9. | Process Data | 11/2011-10/2012 |
| 10. | Final File | 11/2012 |
| 11. | NCES Reports Results | 5/2013 |

2013-14 PSS

The list-frame development for the 2013-14 PSS will take place during this clearance. These activities will be conducted according to the following time schedule:

- | | | |
|----|--|---------------------|
| 1. | Obtain OMB approval for the 2013-14 PSS list-frame development | 7/1/2010 |
| 2. | Request Private School Lists | 7/18/2012 |
| 3. | Conduct Screener Calls for List-Frame Schools | 8/15/2012/5/15/2013 |

One of the purposes of this survey is to produce descriptive statistics about the number of private schools, teachers, students, and high school graduates. Survey responses will be weighted to produce national estimates. Tabulations will be produced for each data item. Cross tabulations of data items will be made with selected classification variables such as religious orientation (Catholic—parochial, diocesan, private; other religious—conservative Christian, affiliated, unaffiliated; nonsectarian—regular, special emphasis, special education); size of student body (less than 50, 50 to 149, 150 to 299, 300 to 499, 500 to 749, 750 or more); and level of instruction (elementary, secondary, combined). See Appendix E for examples of table shells (for a more comprehensive set of tables see *Characteristics of Private Schools in the United States: Results From the 2007-08 Private School Universe Survey, NCES 2009-313*, which can be accessed from the PSS web page at <http://nces.ed.gov/surveys/pss>). NCES will publish the 2011-12 survey results in May 2013.

A17. Request Not to Display Expiration Date

Not applicable.

A18. Exceptions to the Certifications

Not applicable.