

**Response to AAUW Public Comment on Schools and Staffing Survey (SASS 2011/12) Preliminary Field Activities  
2010/11, OMB Control Number: 1850-0598**

**December 14, 2010**

**Public Comment:**

**From:** Scott, Beth [mailto:scottb@aauw.org]

**Sent:** Thursday, November 18, 2010 6:15 PM

**To:** oira\_submission@omb.eop.gov; IC DocketMgr

**Cc:** Sherman, Tracy

**Subject:** AAUW Comments on Schools and Staffing Survey, OMB Control Number: 1850-0598

Attached please find (in AAUW Comments on DoEd SASS Data 11-18-10.pdf) the American Association of University Women's (AAUW) comments on the Schools and Staffing Survey (SASS 2011/12), OMB Control Number: 1850-0598. AAUW is particularly interested in the survey's collection of data regarding:

- the incidence, frequency, seriousness, and nature of violence affecting students, school personnel, and other individuals participating in school activities
- the availability of, and access to, before-school and after-school programs (including such programs during school recesses)
- student participation in and completion of secondary and postsecondary vocational and technical education programs by specific program areas<sup>3</sup>

We look forward to working with you on this important issue.

Regards,  
Beth

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**Response:**

**Improving School Climate**

AAUW is particularly interested in the survey's collection of data regarding the incidence, frequency, seriousness, and nature of violence affecting students, school personnel, and other individuals participating in school activities.

The SASS should be configured so schools have to include instances of bullying and harassment when they report instances of violence. This will help capture what is actually happening at schools. (...) AAUW believes that the SASS's definition of "violence" affecting students, school personnel, and other individuals participating in school activities should encompass both physical and emotional violence, as both can be very harmful to students' well-being and academic success. (...) The Department of Education should collect information on emotional and physical violence.

SASS does not collect data on specific violent incidents, but there are two other surveys that do collect such data:

1. The "Disciplinary problems and actions" section of the School Survey on Crime and Safety (SSOCS) provides data on incidents of student bullying and sexual harassment among students reported by

schools: [http://nces.ed.gov/surveys/ssocs/pdf/SSOCS\\_2008\\_Questionnaire.pdf](http://nces.ed.gov/surveys/ssocs/pdf/SSOCS_2008_Questionnaire.pdf) (see question 16 on page 11; the number of hate crimes or gang-related crimes is measured in item 17 on page 12; and the frequency of student bullying and student sexual harassment are measured in question 20 on page 13).

2. Additionally, the School Crime Supplement to the National Crime Victimization Survey (NCVS) captures student bullying and whether a teacher was notified, according to student reports: <http://nces.ed.gov/programs/crime/surveys.asp>.

These two surveys are the most appropriate vehicles for gathering data on reports of student bullying and harassment among students. By comparison, SASS is not structured to collect counts of incidents at schools or any reports from students. Rather, the data collected from principals about school climate is based on perceptions of administrators about the school as a learning community and as a teaching workplace.

NCES recognizes that documenting emotional violence, as well as physical violence, is important. It is possible to ask teachers to report any incidents they are aware of, but it is also quite difficult to measure emotional violence and ask about it clearly and succinctly. NCES would need to do extensive research and testing on this topic to be able to provide valid measures of emotional violence and harassment. It is not possible to do this within the timeframe for collecting the 2011-12 SASS. NCES will give this topic full consideration for 2015-16 SASS.

### **After-school Programs**

AAUW is particularly interested in the survey's collection of data regarding the availability of, and access to, before-school and after-school programs (including such programs during school recesses).

AAUW supports the SASS's intent to collect data about the availability of, and access to, before-school and after-school programs for students, as we believe this additional data could help schools address the need for after-school programs in their communities. (...) The Department of Education should collect information on before-school and after-school programs.

No change is requested; SASS will continue to carry the 2007-08 item in the School Survey about any "extended day program providing instruction beyond the normal school day for students who need academic assistance." SASS will also continue to ask about the availability of before-school or after-school day care programs. In addition, there are items on summer school or intersession activities for academic assistance or for academic advancement or enrichment (see <http://nces.ed.gov/surveys/sass/pdf/0708/sass3a.pdf>, items 20 through 22).

### **Vocational and Technical Education**

AAUW is particularly interested in the survey's collection of data regarding student participation in and completion of secondary and postsecondary vocational and technical education programs by specific program areas.

AAUW is pleased that the SASS will collect data on student participation in and completion of secondary and postsecondary vocational and technical education programs by specific program areas. AAUW believes the SASS should solicit data about these programs and whether they are gender-neutral in practice and effect. (...) The SASS can play a key role in promoting girls' access to vocational, technical and STEM programs by including questions about girls' access to gender-neutral career counseling and guidance. Additionally, the SASS should ask schools who their Title IX coordinator is. Currently, Title IX requires recipients of federal education funding to appoint at least one employee to ensure that the school's programs do not discriminate on the basis of sex. However, many schools do not actually have Title IX coordinators. Even at schools that do have a Title IX coordinator, often students don't know who this person is. This results in students not having anyone to go to if they have a problem and not knowing their rights under Title IX. AAUW believes that collecting data on gender-

neutral career counseling and Title IX coordinators is extremely important. The data revealed by the SASS will help determine and shape future education policies and, as with the data on bullying and harassment, having the most information possible will provide the best picture of the challenges facing our nation's schools and students. (...) The Department of Education should collect information on whether schools have gender-neutral career and guidance counseling and Title IX coordinators.

To the extent that career and technical education teachers are sampled in SASS, it is possible to estimate how many students are enrolled in particular types of courses. SASS does not however gather data on completion of particular career and technical programs, nor any data on career and technical postsecondary education programs. Such information typically extends beyond K-12 education, and SASS covers only the K-12 realm. Information on high school courses can be also obtained from NCES high school longitudinal studies and through NCES transcript studies (conducted through NAEP and through high school longitudinal studies). For postsecondary education, the National Postsecondary Student Aid Study (NPSAS) has information on student enrollments by program area, and every other administration of NPSAS has a longitudinal component, the Beginning Postsecondary Students Longitudinal Study (BPS), which allows one to track program completions. Additionally, the Integrated Postsecondary Education Data System (IPEDS) provides completion counts by postsecondary program areas.

There is no simple way to ask about "gender-neutral career counseling and guidance," in the same way that SASS asks whether schools with grades 9-12 offer career and technical education courses or dual-enrollment programs to their students. These topics are more suited to student-based longitudinal studies rather than for SASS. In a longitudinal study, it is possible to ask whether an individual female student was counseled out of taking a particular type of career or technical education course or program. The High School Longitudinal Study of 2009 does have items on guidance counselors. The Education Longitudinal Study of 2002 has items about perceptions of student ability by gender for STEM fields.

Adding an item to the SASS Principal or School survey about whether schools can name a Title IX coordinator may sound relatively easy to do. However, there is the possibility that many schools, particularly elementary schools, public charter or private schools, would not recognize the term "Title IX" or know what a Title IX coordinator is or does, without some context. It would require cognitive testing to ensure that potential respondents understand what context would make the most sense, without loading the question, when asking about a Title IX coordinator. There is not sufficient time to get this done and changes implemented to the questionnaires prior to the 2011-12 data collection operation. NCES will give this topic full consideration for 2015-16 SASS.

## **General**

AAUW is pleased that the survey data will be cross-tabulated and disaggregated by gender, race, ethnicity, socioeconomic status, limited English proficiency, mobility, disability, urban, rural, suburban districts, and other population characteristics wherever possible. Having the most accessible, accurate and detailed information will provide the clearest picture of our nation's schools and their challenges. School districts, educators, and policymakers cannot create the right solutions if they do not have all the possible data.

No change is requested. NCES will continue to strive to provide accurate and useful data on these topics.