



U.S. Department of Education
Institute of Education Sciences

NPEFS 2015-2017: Common Core of Data (CCD) National Public Education Financial Survey

Supporting Statement Part A

OMB# 1850-0067 v.12

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National Center for Education Statistics (NCES)

Documents in This Submission

Part A. Justification

Part B & C. B-Collections of Information Employing Statistical Methods

C-National Public Education Finance Survey (NPEFS)

C.1. Discussion of Items

C.2. Sample Tables

Appendix A. Communication Materials

A. 1. Federal Register Notice: Submission of Data by State Educational Agencies
Submission Dates for State Revenue and Expenditure Reports for FY 2014
Revisions to those Reports, and Revisions to prior Fiscal Year Reports

A.2. Correspondence

Initial cover letter to Respondents

Submission letter

Crosswalk letter

Closeout letter

A.3. FY 14 NPEFS Instruction Manual

Appendix B. Survey Items

B.1. Survey Form

B.2. Data Plan

Appendix C. FY 12 NPEFS Documentation

C.1. Main body of FY 12 NPEFS Documentation

C.2. Appendices

PART A. JUSTIFICATION

A1. Necessity of Information Collection

a. Purpose of this Submission

The National Center for Education Statistics (NCES) requests approval of the collection of National Public Education Financial Survey (NPEFS) data covering fiscal years 2015 through 2017 (corresponding to school years 2014/15 through 2016/17), that would be carried out in 2016 through 2018. NPEFS is an annual collection of state-level finance data that have been a component of NCES's Common Core of Data (CCD) since FY 1982 (covering school year 1981/82). The U.S. Census Bureau, Governments Division, is the data collection agent for NCES under interagency agreement. With regards to this clearance request, NCES has not added any new data items since the last NPEFS OMB clearance received in July 2012 and amended with a change request approved in February 2012 (OMB# 1850-0067 v. 10-11). Commencing with FY 15 data, NCES will not continue to collect seven data items on NPEFS, previously collected pursuant to the American Recovery and Reinvestment Act (ARRA).¹ The ARRA data items have been removed from NPEFS because SEAs have expended the vast majority of Recovery Act funds, either through formula or competitive grants.²

Overview of CCD Survey Components

CCD is the primary NCES database on public elementary and secondary education in the United States. The annual CCD is a comprehensive national statistical database of all public elementary and secondary schools and school districts that contains comparable data across all states. One of the objectives of CCD is to provide basic information and descriptive statistics on public elementary and secondary schools, students and staff, and the supporting financial data on revenues and expenditures.

The CCD is made up of six administrative records surveys of state education departments (SEAs). There are three nonfiscal survey components, which are collected as part of the Department of Education's EdFacts system:

- State Nonfiscal Survey of Public Elementary/Secondary Education—provides information on all students and staff aggregated to the state level, including number of students by grade level, full-time-equivalent staff by major employment category, and number of dropouts and high school completers from the previous year.
- Local Education Agency (LEA) Universe Survey—provides information including address and telephone number, location and type of agency, latitude and longitude, locale (e.g., rural, urban), number of students that the LEA is responsible for educating, number of students with limited English proficiency served in programs, number of students with Individualized Education Programs, numbers and types of staff (e.g., teachers and guidance counselors), and number of high school completers and dropouts from the previous year.
- Public Elementary/Secondary School Universe Survey—provides information on all public elementary and secondary schools in operation during a school year, including school type, address and telephone number, latitude and longitude, and locale type (e.g., rural, urban); grades offered; magnet, Title I, and charter school indicators; student enrollment by grade, gender, and race-ethnicity characteristics; number of classroom teachers; and number of students eligible for free and reduced-price lunch.

There are two fiscal survey components collected separately in cooperation with the U.S. Census Bureau:

¹ As a result of the ARRA, commencing with FY 10 data, NCES added to NPEFS seven data items in order to collect and analyze data pertaining to Title I, Impact Aid, and other ED funds.

² The Education Department General Administrative Regulations (EDGAR) allows grantees to carry over 1 additional year any Federal Education funds that were not obligated in the period for which they were appropriated. For grants that are forward-funded, grantees can have up to 27 months to obligate appropriated funds beginning as early as July 1 of the federal fiscal year.

- National Public Education Financial Survey (NPEFS)—provides detailed finance data at the state level, including average daily attendance; school district revenues by source (local, state, and federal); and expenditures by function (instruction, support services, and non-instruction), sub function (e.g., school administration), and object (e.g., salaries). This survey also includes capital outlay and debt service expenditures.
- Local Education Agency Financial Survey (Form F-33)—provides detailed data by school district, including revenues by source and expenditures by function and subfunction. This survey is co-sponsored by the U.S. Census Bureau and published by Census as the Survey of Local Governments: School Systems (OMB# 0607-0700).

The sixth component is a research and development collection of school-level finance data:

- School Level Finance Pilot Survey (SLFS) — The School-Level Finance Survey (SLFS) is essentially an expansion of the F-33 survey to collect finance data at the school level. Respondents for the pilot survey will include up to 15 SEAs in the first year (2015) and up to 20 SEAs in the second year (2016) of SLFS data collection. The primary goal of the pilot SLFS is to test the feasibility of collecting school level finance data in conjunction with the existing LEA- and SEA-level finance surveys. The pilot SLFS will evaluate the collection method to determine if it is a viable, efficient, and cost effective method to gather school-level finance data and whether this method provides higher quality data than the previously used methods of collecting these data.

Part A of this supporting statement presents the justification for the information collection and an explanation of any statistical methods employed. Part B addresses the collection of information employing statistical methods. Part C describes the NPEFS survey. Appendix A is a compilation of all communication materials between NCES, the Census Bureau, and the respective SEAs.

b. Legislative Authority

NPEFS is the Nation’s only source of annual statistical information about total revenues and expenditures for public elementary and secondary education at the state level. The Education Sciences Reform Act of 2002 (20 U.S.C. section 9543) provides the legislative authority for NCES to collect this information.

c. Regulations and Program Requirements

Participation in the CCD is voluntary, but several Department of Education Programs require the use of its data. The use may be stipulated by guidance or reporting instructions rather than regulation.

A2. Needs and Uses

NPEFS is an annual state level school finance data collection that began in FY 1982. NPEFS has existed in its current form since 1986. The NPEFS survey contains data on federal, state, and local revenues by source, as well as expenditures by function and object. The expenditure functions include instruction, instructional staff support services, pupil support services, general administration, school administration, operations and maintenance, student transportation, other support services (such as business services), food services, enterprise operations, and total current expenditures. Objects reported within a function include salaries, employee benefits, purchased services, supplies, equipment, debt service, miscellaneous, and other items. These categories can be further classified by sub-object.

Average daily attendance is also collected. The NPEFS includes data on all public schools from the 50 states, the District of Columbia, American Samoa, the Northern Mariana Islands, Guam, Puerto Rico, and

the Virgin Islands. NPEFS serves as both a statistical and an administrative collection used for a number of federal program funding allocations.

Statistical Uses

As a general statistical collection the NPEFS is used for a range of purposes. Education finance data provide powerful information for reporting, research, management and budgeting decision making, policymaking, and evaluation within and across education systems. Uses can be far-ranging from state and national comparisons to individual school level management of resources. The consumers of education finance data typically include five major groups: (1) oversight bodies such as school boards, state education agencies, legislatures, and policymakers; (2) those who are involved in the lending process such as investors or creditors; (3) leadership and managers of education systems at the district and school level; (4) researchers, and (5) the public.

NPEFS data are also used for the *Condition of Education* – a congressionally mandated annual report from NCES and for the *Digest of Education Statistics* and CCD-specific reports, such as the annual *Revenues and Expenditures for Public Elementary and Secondary Education*. The NCES website makes the CCD school finance data available to the general public through public use data files and through easy to use applications such as the Search for Public Schools and Districts locator tool; Elementary-Secondary Information System (EISi) tool; and School District Demographics System. Additionally, *Education Week* uses NPEFS data extensively in its annual “Quality Counts” report, and NPEFS data are a component of Standard and Poor’s metrics on schools: <http://www.SchoolMatters.com>.

Administrative Uses

The Secretary of Education uses NPEFS data directly in calculating allocations for certain formula grant programs, including, but not limited to Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), Impact Aid, and Indian Education programs.³ Based on the attendance, revenue, and expenditure data collected from SEAs, NCES determines a State’s “average per-pupil expenditure” (SPPE) for elementary and secondary education, as defined by the ESEA section 9101(2) and as amended by 20 U.S.C. section 7801(2). Furthermore, other programs, such as the Educational Technology State Grants program (Title II Part D of the ESEA), the Education for Homeless Children and Youth Program under Title VII of the McKinney-Vento Homeless Assistance Act, and the Teacher Quality State Grants program (Title II Part A of the ESEA) make use of SPPE data indirectly because their formulas are based, in whole or in part, on State Title I Part A allocations.

A3. Use of Information Technology

The NPEFS data are collected from SEAs using a web application developed and maintained by the Census Bureau and located on NCES servers. NCES collects data annually from SEAs through ED Form 2447. The web application allows NPEFS respondents to submit/edit survey data, complete the fiscal data plan, and upload or download any files necessary for data submission. The NPEFS website utilizes the format required for submission to NCES and houses the *Crosswalk System*, where NPEFS respondents can “crosswalk” their state account code data to the NPEFS survey data items. The authorized state official may electronically confirm submission with the state’s NPEFS digital confirmation password. Survey respondents also have the option of printing a survey form, completing it by hand, and submitting a paper report. The paper report option is not used by more than one or two states in any year. The web

³ Department of Education, Submission of Data by State Educational Agencies; Submission Dates for State Revenue and Expenditure Reports for Fiscal Year” (FY 2014, Revisions to Those Reports and Revisions to Prior Fiscal Year Reports 80 Federal Register 15 (23 January 2015) pp. 3577-78).

application produces an Excel spreadsheet dataset that consists of a single record per state that can be used to review NPEFS data externally or produce a publishable data file.

A4. Efforts to Identify Duplication

NPEFS (OMB# 1850-0067) is an annual NCES collection of state-level finance data that has been included in the CCD since FY 1982. The survey most closely resembling NPEFS is the Survey of Local Governments: School Systems (OMB# 0607-0700), commonly called F-33, which NCES co-sponsors with the Census Bureau (note that NCES refers to F-33 as the Local Education Agency Financial Survey). The F-33 is an annual collection of school, district, or LEA finance data, including data on local revenues by source and state, federal revenues by program, and expenditures by function with breakouts of salaries and benefits by function and information on debt.

Prior to FY 1987, Census and NCES each conducted separate collections of LEA finance data. Beginning with the FY 1987 survey year, NCES and Census consolidated the LEA finance collections into the F-33. Beginning with the FY 1992 survey year, the survey content was expanded to include revenues from federal education programs and itemize state payments on behalf of school districts (also called direct support) at the function level. The F-33 was originally a sample survey in non-census years, but in the FY 1995 survey year, the F-33 was changed to an annual universe collection of LEA finance data. The F-33 collects data from regular school districts, independent charter school districts, as well as a substantial number of administrative and operating LEAs that are unlike typical school districts (e.g., education service agencies that provide specialized education services for regular school districts).

In 2012, NCES and Census re-evaluated the feasibility of consolidating the NPEFS and the F-33 programs. As a result, several substantial differences were identified between the needs and the scope of the two survey collections:

1. The reporting deadlines are substantially different;
2. Not all of the data items collected at the state level can currently be collected at the LEA level;
3. Some data item definitions differ between surveys due to their uses and sources;
4. The timing of the editing processes and procedures by SEAs vary greatly between the state level data versus the LEA level data.

The reporting deadlines are substantially different

The most significant barrier to consolidation is the difference in the timing of reporting deadlines for each survey. In order to comply with federal statutory obligations and to provide the data needed by the Secretary of Education to calculate allocations for and allow for timely distribution of federal funds⁴, States must submit current year and revised prior year state-level data by August 15 of each year. However, many states do not currently report the LEA level data until December of each year.

Not all of the data items collected at the state level can currently be collected at the LEA level

The LEA finance survey includes only local education agencies and does not collect data about schools administered directly by the state, such as schools for students with disabilities (e.g., schools for the Deaf and Blind); schools for students with exceptional talent in mathematics, science, or the performing arts; or education programs for incarcerated youth (e.g., schools run by the Bureau of Prisons within juvenile

⁴ Department of Education, Submission of Data by State Educational Agencies; Submission Dates for State Revenue and Expenditure Reports for Fiscal Year” (FY 2011, Revisions to Those Reports and Revisions to Prior Fiscal Year Reports 77 Federal Register 6 (10 January 2012) pp. 1472-1473).

corrections). The LEA level data cannot be summed to provide the state-level data because NPEFS includes expenditures for state-operated agencies, which are out-of-scope for F-33. Furthermore, NPEFS requires an exhaustive accounting of state revenues and expenditures for public K–12 education that the F-33 cannot provide.

Some data item definitions differ between surveys due to their uses and sources

For example, Tax Revenues differ between NPEFS and F-33 because the tax revenue-definitions of “independent school district” and “dependent school district” differ. NPEFS classifies tax revenue as state or local based on how the SEA classifies the tax revenue, while the F-33 classifies tax revenue based on the level of government that imposed, collected, and distributed the tax.

The timing of editing processes and procedures by SEAs vary greatly between the state level versus the LEA level data

1. The timing of editing processes and procedures by SEAs vary greatly between the state level data in NPEFS versus the LEA level data in the F-33. While SEAs are able to submit the state level data by August 15, they are not able to submit, review, clarify, correct, and certify the LEA level detailed data on the same schedule.
2. On June 14, 2012, during an interactive webinar briefing, the majority of state fiscal coordinators indicated that accelerating the reporting deadlines for LEA finance data would significantly and unnecessarily increase the burden and cost to the SEAs, and that it is more efficient and effective for them to submit data separately to NPEFS and F-33.

In summary, the potential efficiency gained by consolidating the two surveys is far outweighed by the capacity issues at the state and federal levels, the practical problems with changing the reporting deadlines for LEA finance data, and the purposeful differences between the two collections.

Despite the continued need for separate collections, the F-33 and the NPEFS collections are inter-related and complementary. By working together, NCES and Census have found ways to create efficiency in use of resources between both surveys. Many states provide one fiscal coordinator for both surveys, and NCES and Census provide consolidated training to fiscal coordinators for both surveys at once. NCES uses the F-33 to provide consistency checks between the data reported for each survey. This often allows for identification and resolution of errors in the reported data for one or both collections, resulting in improvement in the data quality for both programs.

A5. Minimizing Burden

Small businesses or other small entities are not surveyed in the NPEFS collection. NPEFS data comes from state’s administrative records and NCES works with LEAs on an ongoing basis to assure that burden associated with NPEFS data submission is kept to a minimum.

A6. Consequences of Less Frequent Collection

Consequences if not collected. Having accurate, consistent, and timely fiscal information from states is critical to an efficient and fair federal allocation process and to the ability to make publically available current and comparable finance data for all states and territories. The federal register states that, “Having accurate, consistent, and timely information is critical to an efficient and fair Department of Education

(Department) allocation process and to the NCES statistical process.”⁵ The annual collection of NPEFS data helps ensure timely distribution of Federal education funds based on the most current and accurate data available. If NPEFS was not collected on its current schedule, the Department of Education would not have access to current and comparable state per-pupil expenditure data for use in determining program allocations, and thus would not have the needed basis for calculating allocations for various formula grant programs, such as the Title I, Part A of the ESEA; Impact Aid; and Indian Education programs, the Education for Homeless Children and Youth program under Title VII of the McKinney-Vento Homeless Assistance Act, or the Teacher Quality State Grants program (Title II, Part A of the ESEA). The Department of Education would no longer have an official indicator of the level of effort (measured in dollars) that state and local governments are making to provide public education.

As a statistical collection, discontinuing NPEFS would have negative consequences for school boards, legislatures and policymakers, state education agencies, investors or creditors, managers of education systems at the district and school level, researchers, and the public.

Consequences if collected less frequently. The NPEFS is an annual collection and the state administrative record systems that supply these data already collect the information annually or more often for the states’ own purposes. Changing the NPEFS from an annual cycle to a less frequent schedule would cause the federal programs that use NPEFS data to have less accurate information based on which to calculate allocations and to plan and operate the programs. These programs would have to make their annual allocations based on old information or estimated updates. Additionally, legislators, policymakers, and the public would not have access to current and comparable fiscal information pertaining to K-12 education.

A7. Special Circumstances

No special circumstances associated with the NPEFS survey are anticipated.

A8. Consultations Outside the Agency

Each state’s Chief State School Officer appoints a staff person to serve as the state’s Fiscal CCD Coordinator. There is ongoing communication with these individuals about data content, availability, publication, etc. (<http://nces.ed.gov/ccd/corner.asp>).

Also, the most recent Federal Register Notice on the Submission of NPEFS Data by State Educational Agencies, including submission dates for State revenue and expenditure reports for FY 2014, revisions to those reports, and revisions to prior fiscal year reports, was published on January 23, 2015, Volume 80, No. 15, pp. 3577-78.

A9. Provision of Payments or Gifts to Respondents

No payments or gifts are offered to respondents.

A10. Assurance of Confidentiality

No such assurances are needed or offered to the state education agencies. The NPEFS data are public record in the states that report them. No individually identifiable data are collected through the NPEFS.

A11. Need for the Use of Sensitive Questions

⁵ *Ibid.*

The NPEFS data are from SEA administrative record systems and do not involve sensitive questions.

A12. Estimates of Hour Burden

The information reported on the NPEFS survey has already been collected by the reporting agencies for the state’s own uses. The added burden for the NPEFS is limited to the state education agency’s effort taken in extracting data from files, transferring them to NCES, and responding to edit reports. The total estimated burden time for all 56 participating SEAs is 5,264 hours a year.

The 2014-15 costs associated with reporting NPEFS data were derived from information about the actual cost of employing an SEA staff to work with NCES testing programs. The estimated number of hours per respondent for the various forms was arrived at through consultation with the SEA respondents. The estimated hours per respondent for technicians and managers set forth below were calculated based on information directly provided by state fiscal coordinators who work on the NPEFS data collection. The salaries for technicians and managers from SEAs to collect and submit NPEFS data are based on the Occupation and Employment Statistics at the U.S. Department of Labor, Bureau of Labor Statistics (BLS). Across the 50 states and the District of Columbia, the average hourly rate for for SEA and local government employees reporting NPEFS data is estimated to be \$24.53.⁶ The estimate assumes that 20 percent of the time spent on the NPEFS collections is provided by managers, paid at the higher rate of technicians, or \$47.51 per hour.⁷ The total estimated cost to all state respondents is **\$153,577**.

Table 1. NPEFS Estimated Respondent Burden Hours and Cost

Submission Method	Number of Respondents	Estimated hours per respondent	Estimated Total Respondent Burden Hours	Estimated Cost Per Burden Hour *	Estimated Total Respondent Cost
Interactive on-line survey form	56	75	4,200	\$24.53 (Technician)	\$103,026
Interactive on-line survey form	56	19	1,064	\$47.51 (Manager)	\$ 50,551
Total	56		5,264		\$153,577

As previously mentioned, NPEFS leverages the work of state fiscal coordinators on the Annual Survey of School System Finances (F-33; OMB# 0607-0700)⁸, which is an annual collection of school district finance data by the US Census Bureau. Respondents often use data from the Annual Survey of School

6 Based on the 2013 Annual Survey of Public Employment and Payroll for the education-elementary and secondary total function; calculated by dividing the total monthly payroll for full time state and local government employees by the number of full-time employees, and converting the result to an hourly rate assuming an average forty-hour week. US Census Bureau website accessed April 20, 2015: <http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmlk>.

7 The mean salary for financial managers (SOC code 113031) working in State government is \$47.51 per hour. The Occupation and Employment Statistics at the U.S. Department of Labor, Bureau of Labor Statistics (BLS) were accessed on June 9, 2015 SOC code: Standard Occupational Classification code -- see <http://www.bls.gov/soc/home.htm> NAICS code: North American Industry Classification System code -- see <http://www.bls.gov/bls/naics.htm>

8 The Annual Survey of School System Finances data are collected from the universe of school districts using uniform definitions and concepts of revenue, expenditure, debt, and assets.

System Finances to cross check and edit NPEFS data as some of the same data items are reported on the district level for F-33 and on the state level for NPEFS. Respondents cannot cross check all data items between NPEFS and the F-33 surveys because there are significant differences between the two collections. In order to enhance efficiency, NCES and Census provided account numbers in the NCES financial accounting handbook beside the revenue and expenditure items on the Form F-33.

A13. Estimates of Cost Burden

There are no additional recordkeeping costs to the responding state education agencies. All NPEFS data are extracted from administrative record systems already collected by the state for its own purposes and are of the type and scope normally included in government records. The information requested does not require special hardware or accounting software or system, and thus respondents are not expected to incur any capital and start-up costs or system maintenance costs in responding. If any outside accounting or information collection services are contracted for by the respondent, they are considered part of customary business practices and not specifically required for this information collection.

A14. Cost to the Federal Government

Method for estimating costs: Estimated annual costs presented below assume a 5 percent increase over current costs for the NPEFS. The costs include a 30 percent load on salaries for Department of Education staff. Contracted staff amount also represents loaded costs.

Estimated Annual Cost of NPEFS to Federal Government for Fiscal Year 2015

Cost Type	Collection of 2014-15 Data
NCES Staff	\$85,631
Census (IAD) Total	\$960,345
Contracted Staff	\$125,500
SEA Staff Training	\$107,779
Total	\$1,279,255

Cost: Department of Education staff assigned to NPEFS include one-half of one FTE (GS14) staff and one-tenth (FTE) of one program manager’s (GS15) time.

Contracted staff consists of one full-time research assistant employed through the American Institutes for Research. .

Costs reported for the Bureau of the Census include staffing and other charges.

Census FTE for the 2015 – 2016 Contract Period (June 2015 – May 2016)			
Survey	Survey Analyst	IT Programmers	Mathematical Statisticians
NPEFS	4.50	1.4	.45

Training costs reflect the cost of general training and professional development for all CCD Fiscal Coordinators at NCES’s Summer Data Conference and the costs of conducting training at NCES of approximately 12 new fiscal coordinators each year.

A15. Reason for Change in Burden

No change in respondent burden associated with this submission is expected.

A16. Project Schedule

NPEFS Products:

1. NPEFS data are published through web applications and short reports that typically include 8 to 10 tables of data presented by state and for the Nation.
2. NCES’s web applications, the Elementary-Secondary Information System and Build a Table, allow users to create their own lists, counts, or cross-tabulations.
3. Supporting Statement Part C includes tables that illustrate how the CCD data are typically presented as simple cross-tabulations.
4. Complex analytical techniques are not used with the NPEFS.

Timeline. The NPEFS is an annual collection, and the schedule is shown below. Note that the files cannot be closed until the last state is able to report all requested data.

	NPEFS Survey Collection, Processing, and Publication
Late January	Mail instructions to respondents and open NPEFS website to receive data SEAs can begin to submit accurate and complete data
March 15	SEAs are urged to have finished submitting accurate and complete data
April/May	Training for new state fiscal coordinators
July	Training for all state fiscal coordinators
August 15	Mandatory final submission date
September (Tuesday following Labor day)	Response by SEA’s to requests for clarification, reconciliation, or other inquiries from NCES or the Census Bureau. All data issues to be resolved. Close NPEFS file on Tuesday following Labor Day. No files are accepted for program funding purposes after close-out.
December	Provisional files available for internal use but not publication
February	Provisional per-pupil expenditure data available
March/April	NCES review of files, file documentation, and short reports
June/July	Files become public and NCES web database updated

A17. Request Not to Display Expiration Date

NCES displays the OMB expiration date on the instruction manual sent to the state Fiscal CCD Coordinators and on the data collection web site.

A18. Exceptions to the Certification

There are no exceptions to the items in that certification.