



U.S. Department of Education
Institute of Education Sciences

Supporting Statement For Common Core of Data Survey System

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**National Center for
Education Statistics**

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Supporting Statement For Common Core Of Data Survey System

Introduction

This is a request for review and approval of the Common Core of Data (CCD) survey system. The supporting statement for Standard Form 83, "Request for OMB Review," was prepared by the Elementary/Secondary Cooperative System and Institutional Studies Program of the Elementary/Secondary and Longitudinal and Longitudinal Surveys Division within the National Center for Education Statistics (NCES). NCES is requesting a 1-year clearance for the CCD through January 2008. This clearance would apply to the collections for the 2006–07 school year.

The CCD is an annual collection of information about public schools and local education agencies, reported by state education agencies. The information is drawn from the state education agencies' administrative records systems; no additional data are collected from schools or districts.

Common Core of Data (CCD) Data Collection

In the 19th Annual Management Information System Conference (February 2006), Mark S. Schneider, Commissioner for the National Center for Education Statistics, announced that starting with the 2006-2007 school year, the Common Core of Data (CCD) collection (1850-0067) will be submitted through EDEN as a pilot test and states would not be required to submit these data twice.

Commissioner Schneider said that NCES and EDEN began serious conversations in early February 2006 on merging CCD and EDEN and it was decided that the current technology of the two submission systems is compatible and the process of reconciling the content and collection periods appears to be feasible. He proposed that the submission of 2006-2007 school year data be a transition and, upon success, the merger will become formal for submission of 2007-2008 data.

In 2006-2007 state reports will come into a single interface that will direct the files simultaneously to the CCD online collection application and to EDEN. States will face the same CCD edits, and have the same data quality requirements for locking their submissions, as they do now. However, the data sets will be submitted on the EDEN collection schedule. This means that the separate CCD data files will be submitted incrementally when they become available instead of being held and submitted as a package together when the last file is available. This also means that the "prior year" data collected by CCD will be submitted as part of the appropriate EDEN data files.

In 2007-2008, the state CCD reports will come into a single interface that integrates the on-line edits of both EDEN and CCD - one set of edit reports, one help desk. The files will go to the CCD and EDEN databases. CCD will carry out further quality control and add NCES IDs, geocode information, standardize agency or school name and address, etc. The edited data will be forwarded to the EDEN database and to the NCES Web applications.

NCES and EDEN staffs are working to implement this vision.

We are requesting clearance for the CCD by January 31, 2007 in order to initiate the 2006–07 collection on February 1, 2007.

Five surveys comprise the CCD survey system. These are:

- State Nonfiscal Survey of Public Elementary and Secondary Education;
- Public Elementary/Secondary Local Education Agency Universe;

- Public Elementary/Secondary School Universe;
- National Public Education Financial Survey;
- Local Education Agency Financial Survey.

The Local Education Agency Financial Survey is co-sponsored by the U.S. Census Bureau, Governments Division, which is responsible for securing clearance for that survey. It is discussed in this request only as it relates to the National Public Education Financial Survey.

The current submission proposes no modifications to the format of the current surveys, which are approved for use through the 2005–06 school year collection.

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. Parts C through F describe the individual surveys and any proposed changes to them.

NCES and EDEN are piloting a combined collection of 2006-07 school year data. (Nonfiscal only; EDEN does not collect school finance data.) All of the nonfiscal items in this request for survey clearance are included in the 2006-07 EDEN collection. This request for approval of the 2006-07 CCD nonfiscal surveys is submitted because we cannot guarantee that all states and other jurisdictions will be able to participate fully in EDEN for 2006-07. We estimate that the 8 other jurisdictions (i.e., non-state respondents) and as many as 4 states will need to report directly to the CCD for 2006-07.¹ We are requesting clearance for the period February 1, 2007 through January 31, 2008.

¹ The other jurisdictions are the Department of Defense Dependents Schools, domestic and overseas; the Bureau of Indian Education; American Samoa; Commonwealth of the Northern Mariannas; Guam; Puerto Rico; and the U.S. Virgin Islands.

Part A. Justification

A.1. Explain the circumstances that make the collection of information necessary. Include identification of any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

Legislative Authorization. The CCD is the Nation's only source of annual basic directory and statistical information about the universe of public schools and education agencies.¹ Its authorization to collect this information is encompassed by NCES's duty to "collect, report, analyze, and disseminate statistical data related to education in the United States" (P.L. 107-279, Part C, Sec 153). The Section includes in this duty the collection of state-level data, where necessary, on secondary school completions and dropouts, and revenues and expenditures for education and direction to cross-tabulate and report, where possible, data broken out by many of the demographic characteristics collected on the CCD. Appendix A includes a copy of this legislation. Further, CCD data are used extensively by NCES's flagship publication, the *Condition of Education*, required of NCES in P.L. 107-279, Part C, Section 155.

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. Allocations for Title I, Impact Aid, Indian Education and several other programs are based in part upon a state per-pupil expenditure statistic derived from the National Public Education Financial Survey. A copy of the Federal Register notice alerting respondents to this requirement is included in appendix A. The Rural Education Achievement Program, REAP, determines a school district's eligibility through the NCES locale code (a range of urban to rural categories) assigned by the CCD on the basis of reported information. The Universal Service Program (E-rate) required schools to use the NCES-assigned identification number in completing FCC Form 470 (OMB 3060-806). The identification number was required in order to be considered eligible for participation. Through the CCD, NCES provides the Impact Aid program with a list of school districts that are eligible for reimbursements under this program.

A.2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

As a general statistical collection, the CCD is used for a range of purposes. It has existed in its current form since 1986. Because the CCD is a statistical collection, most of its users are outside the agency and will be identified here as well as NCES or other Department of Education users.

Official listing/directory. The CCD provides an official roster of public schools and local education agencies. The information includes both basic directory items, such as name, unique identification code, address, and telephone number and categorical information such as school type (regular, vocational, etc.) and locale (large city, urban fringe, small town, etc.).

The school and agency universes are routinely used to construct and validate commercial listings, such as those available from Quality Education Data (QED) or Market Data Retrieval (MDR). NCES makes directory information available to the public through its Website via the School and District Locators, and provides an Address File that can be downloaded to produce mailing labels. NCES provides customized listings of schools to Department officials; for example,

¹ The CCD collects information from the 50 states, the District of Columbia, Bureau of Indian Education, Department of Defense Dependents Schools (domestic and overseas), American Samoa, Commonwealth of the Northern Mariana Islands, Guam, Puerto Rico, and the Virgin Islands.

developing a list of schools with grades 9 through 12 for a Program that wants to distribute materials to teachers of high school students. The Universal Services Administrative Company (E-rate) requires the CCD identification code for all applying schools.

Sampling frame. As the Nation's only public, annually updated universe of schools and local education agencies, the CCD is the sampling frame for major Department of Education programs and surveys. Within NCES, the CCD provides the sampling frame for the National Assessment of Education Progress (NAEP), the Schools and Staffing Survey (SASS), and the Fast Response Survey System (FRSS). The Office for Civil Rights uses the CCD as a sampling frame and to identify its universe of schools and districts. Within the Department's Education Data Exchange Network (EDEN), CCD school and agency universes define the official list of schools and school districts.

Linking/validating. The CCD assigns unique identification codes to every public school and local education agency. This is the only standard national identification system for these entities.

This identification system makes it possible to link any two databases that include these identification codes. NCES uses the system to "map" decennial Census data to school district boundaries, providing an extremely rich database for research and policy interests. The CCD identification codes serve to link data from all of the Department's data collections within EDEN.

NCES ID is an option for programs using the Department's grants administration program (GAPS), enabling programs that choose to do this to link grants to recipients and to other databases including the school or district ID.

Because the NCES school ID makes it possible to link the universe with other data systems, the CCD school universe has been proposed by the Environmental Protection Agency's interagency working group on geocoding for disaster response as the database for public school identification. (The CCD adds latitude and longitude coordinates for schools to the data reported by states.)

As noted earlier, the CCD has been used by the Universal Service Program to validate a school as being a legitimate applicant for the program. The locale code statistic is used in applications for the Rural Education Achievement Program (REAP) and the Safe Schools/Healthy Students Program.

Descriptive statistics. The data collected through the CCD provide counts of the numbers of public school students, teachers and other staff members, dropouts, and high school completers, with much of the information broken out by race/ethnicity and gender, school or district type, and geographic characteristics such as county or urbanicity. The information is published by NCES in the *Digest of Education Statistics* and the *Condition of Education*, as well as CCD-specific reports such as the annual *Characteristics of the 100 Largest School Districts*. CCD data are used to calculate the averaged freshman graduation rate (AFGR), the standard estimate of on-time graduation rates. The NCES website makes the information available to the general public through public use data files, and through easy to use applications such as Build a Table. *Education Week* uses CCD data extensively in its annual "Quality Counts" report. CCD data are a major component of Standard and Poor's website, <http://www.SchoolMatters.com>

A.3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical or other technological collection techniques or forms of information technology.

The CCD data are collected electronically from state education agencies. The nonfiscal surveys are being collected through EDEN in the 2006-07 pilot. The description below applies to only those states or jurisdictions that are unable to report all data via EDEN. The State Nonfiscal Survey consists of one record per state. It is a web-based survey. State CCD Coordinators are assigned a password that allows them entry to a protected website where they complete the survey, and the data are edited, on line. (The website is maintained by the Census Bureau, which currently serves as NCES's agent for the CCD collections.)

The school and agency universe surveys consist of multiple records for each state. (The exceptions are the District of Columbia, Hawaii, Puerto Rico, and the four outlying areas of American Samoa, the Commonwealth of the Northern Mariana Islands, Guam, and the U.S. Virgin Islands, which have only one school district each, when charter schools are excluded.) These surveys are also online collections. State respondents upload their files (or enter records individually, if desired) into a web-based application that includes real-time edits. This procedure removes the requirement for state respondents to download editing software into their own systems, and shortens the time required for editing data. The data are collected via an SQL server housed at NCES. As with the state-level collections, there is a password protected website for these submissions.

The National Public Education Finance Survey is similar in comprising a single record for each state. This is also collected on line through a self-editing application. In addition, for the Finance Survey NCES provides "crosswalk" software for any state whose financial chart of accounts differs from the survey's format. For both of these surveys respondents have the option of printing a survey form, completing it by hand, and submitting a paper report. This option is not used by more than one or two states in any year.

A.4. Describe efforts to identify duplication.

All of the nonfiscal CCD items are included in EDEN. This eliminates duplication across Department collections. The CCD includes two forms of apparent duplication: across surveys within the CCD, and between the CCD and other collections.

Internal duplication. Several items are requested on two or more of the CCD surveys. Student and teacher counts are collected at the state, local agency, and school levels. High school completion data are collected at the state and local agency levels.

As appendix B illustrates, when data are summed at one reporting level they do not necessarily equal the number reported at higher levels. For example, the total number of teachers in a state's schools may not match the total number in its local agencies, and both figures may differ from the state-level report. School and district teacher counts may be different because there are teachers assigned directly from the central office, not a school. Or, there may be teachers in a district's schools who are not part of the district's staff. An example of this would be a special education teacher who is hired by a service agency but who teaches in a regular school district.

Each of these counts is considered a different statistic, and has different uses. The state level data are considered the official statistics for a state. School- and district-level data can provide information such as average school size, and district pupil/teacher ratio.

State and LEA-level financial surveys. The state-level National Public Education Finance Survey (NPEFS) and the Local Education Agency Financial Survey collect information about revenues and expenditures for public education. NCES will complete a comparison of the NPEFS and the

Local Education Agency Financial Survey in November 2006. If that study concludes the objections listed below can be overcome, NCES will eliminate the NPEFS in FY2009.

Barriers to eliminating NPEFS. The NPEFS collection is reported by SEAs. The data include all revenues and expenditures for public education except expenditures for operation of the SEA itself. Thus, expenditures for programs operated by the state (for example, schools run by the Bureau of Prisons within juvenile corrections facilities) and state expenditures for school districts (for example, contributions to teacher retirement that are made directly to the state retirement system) are included in the NPEFS. Note that these data are not estimates, but are signed off by a state official as accurate and complete.

The first consideration is that replacing the NPEFS with the Local Education Agency Financial Survey would create a substantial burden for states. Although participation is not mandatory for any CCD survey, major education program allocations, such as Title I, require per-pupil expenditure data as collected on the NPEFS. States must report by a specified date (see Federal Register notice in appendix A) in order for their data to be used for program allocations. NCES follows a firm schedule in making final per-pupil expenditure data available to Department of Education programs by February of each year, and preliminary data (used for planning) available earlier, in November and December. The Local Education Agency Financial Survey is used only for statistical purposes, and has no such requirements.

If the local education agency finance reports were aggregated to replace the NPEFS, the same time constraints would then apply to the Local Education Agency Financial Survey. However, the processing and editing time needed for the local agency reports is considerably greater than that for the NPEFS. The change would therefore require a cut-off date much earlier than the current first Tuesday after Labor Day. NCES does not believe that states could meet an earlier reporting date. For example, 25 states submitted their NPEFS reports for the 2002–03 collection cycle in July, August, or on September 2 (the cut-off date).

The NPEFS data used for Title I allocations must be examined and certified by an official designated by the chief state school officer. Reviewing and certifying a report for each LEA in a state would take considerably more personnel time than does certifying a state's single NPEFS report.

A second reason to continue both the NPEFS and the Local Education Agency Financial Survey is that the LEA survey includes only local education agencies. It does not collect data about schools administered directly by the state education agency, such as schools for students with disabilities, schools for students with exceptional talent in mathematics, science, or the performing arts, or education programs for incarcerated youth. Thus, the LEA survey does not give an exhaustive accounting of state revenues and expenditures for public K–12 education.

Duplication between collections. NCES is piloting the collection of state, local education agency, and school nonfiscal data through EDEN for 2006-07. If the pilot test demonstrates that it is possible to collect all of the current nonfiscal CCD through EDEN, with acceptable data quality and adherence to survey timelines, the CCD nonfiscal data will be collected entirely via EDEN beginning with the 2007-08 school year. This will eliminate any duplicate collection of CCD nonfiscal items by different surveys.

A-5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

All of the CCD collections are reported to NCES by state education agencies. NCES does not specify how these data are collected. The responding agencies draw upon their existing administrative records to provide the data. No small businesses or other small entities are surveyed in the CCD collections.

A.6. Describe the consequences to Federal program or policy activities if the collections not conducted, or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Consequences if not collected. Discontinuing the CCD survey system would create problems in a number of Federal activities.

- NAEP, SASS, and OCR school and district collections would no longer have a universe from which to draw their samples.
- Data on the number and types of public schools and education agencies, numbers of students enrolled by grade, numbers of high school dropouts and completers, and revenues and expenditures for public education would no longer be available for publications such as the *Condition of Education* and the *Digest of Education Statistics*.
- The Department of Education would no longer have timely, comparable state per-pupil expenditure data for use in determining program allocations.
- The Department of Education would no longer have an official roster of public school and education agencies to use in determining the eligibility of applicants for certain grants.
- The Department of Education would no longer have a comparable on-time graduation rate for use in policy discussions.

As a statistical collection, discontinuing the CCD would have negative consequences for users outside the Department of Education as well.

- Commercial users would no longer have a universe of schools and education agencies for mailings and for developing their own databases (e.g., QED and MDR).
- The general public would no longer have access to basic data about public education. The current School and District Locators, which are exceeded in the number of visits only by the Department of Education's college loan website, would no longer exist.
- Other federal agencies would not have an up-to-date database of public schools and their locations to use in disaster prevention and recovery planning.

Consequences if collected less frequently. The CCD is an annual collection. The state administrative record systems that supply this data collect the information annually or more often for the states own purposes. There would therefore be minimal reduction in burden if the CCD were not an annual collection.

Changing the CCD from an annual cycle to a less frequent schedule would have several consequences.

- Federal programs using CCD data would have less accurate information upon which to base allocations, plan programs, and operate programs. Programs with annual allocations would have to use old information or estimated updates.
- Surveys that use the CCD would have to use out of date information or follow the CCD's survey cycle. The former would increase the cost and decrease the efficiency and validity of surveys. The latter would flood schools and districts with multiple surveys in a single year.
- Information provided to the public through applications such as the Build a Table and School and District Locator web tools would become less useful because the information would be out of date.
- Annual publications such as the *Digest of Education Statistics* would use out-of-date information in the CCD surveys' off years.

A.7. Explain any special circumstances that require the collection to be collected in a manner (list of conditions follows).

There are no circumstances that would require the CCD surveys to be reported in a way that would occasion one of the listed conditions.

A.8. If applicable, provide a copy and identify the date and page number of publications in the Federal Register... describe efforts to consult with persons outside the agency to obtain their views on the availability of data, the clarity of instructions and record keeping, disclosure or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

General Consultation. The transfer of CCD nonfiscal items to EDEN has been discussed at meetings of the Council of Chief State School Officer's Education Information Management Advisory Committee (EIMAC) Permanent Standing Task Force at each of the group's meetings in 2006. A memorandum was sent to each CCD Nonfiscal Coordinator on May 23, 2006 describing the January 2007 pilot collection and the technical requirements for participation. A copy of that memorandum and a summary of state responses about data availability are included in appendix C.

Race/ethnicity categories. The race/ethnicity categories proposed for this CCD collection follow those in the EDEN 2006-07 clearance request. They are not in compliance with the standards the Office of Management and Budget (OMB) established in 1997. This request for clearance follows the current Department of Education policy of using the 1977 race/ethnicity categories for collections of aggregated data. The 1977 classification categories are American Indian/Alaska Native; Asian/Pacific Islander; Black or African American, not Hispanic; Hispanic; and White, not Hispanic. At the time this supporting statement is written, the Department of Education is in the process of securing approval for a standard set of aggregation categories for OMB's 1997 racial/ethnic standards. It is important that all Department collections of aggregated data (i.e., collections from other than individuals) use the same set of categories for aggregating racial/ethnic data to a manageable number. As soon as the Department announces a standard set of aggregation categories, they will be incorporated into the CCD, following the Department's adoption schedule. During this adoption period the CCD will allow states the option of reporting under the five current categories or the new categories. NCES will develop a procedure for crosswalking data based on the 1977 and 1997 standards and will publish the crosswalk procedure as technical assistance to states and other users of CCD data.

A.9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payments or gifts are offered.

A.10. Describe any assurance of confidentiality provided to respondents and the basis of the assurance in statute, regulation, or agency policy.

No such assurances are offered to the state education agencies. NCES recognizes the sensitivity of dropout status, high school completion status (for those failing to receive a standard diploma), and of free or reduced price eligibility status, and masks identification by adjusting any reported count. In addition, detailed dropout and completion data are available to licensed users only through a restricted use data file.

A.11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

The CCD data are reported from SEA administrative record systems, and none of the items request information that is commonly considered private. Dropout status and free-lunch eligibility data are reported by states as district and school level aggregates, respectively. NCES adjusts these data to ensure no student can be identified. Dropout counts are an important school outcome indicator. Free or reduced-price lunch status is the best available proxy for socio-economic status.

A.12. Provide estimates of the hour burden of the collection of information.

The information reported on the CCD surveys has already been collected by the reporting agencies for the state's own uses. The added burden for the CCD is limited to the state education agency's effort taken in extracting data from files, transferring them to NCES, and responding to edit reports. As noted in the Introduction, we anticipate that the eight other jurisdictions and up to four states may not be able to report via EDEN for 2006-07. Therefore, estimates are based on a total of 12 respondents. The BIA and Department of Defense Education Agency (which reports for both stateside and overseas schools) do not report finance data. Therefore, there are up to 12 respondents to the Nonfiscal surveys and 56 respondents to the NPEFS.

Method for estimating costs. The estimated hours of burden to the states are based upon estimates in the clearance request for school year 2005-06. This is because the change in race/ethnicity categories anticipated in the 2006-07 burden estimate has not yet taken place.

All respondents are encouraged to participate in pilot collection via EDEN. The costs for those states that do not report through EDEN (up to 12 respondents) are based on estimates for the 2005-06 collection.

These 2005-06 costs were in turn derived from information about the actual cost of employing an SEA staff person to work with NCES testing programs. These staff persons are comparable in knowledge and experience to the technical staff who report the CCD data. Across 51 states, the average hourly rate estimated for technical staff reporting CCD data is estimated to be \$39.63. It was decided, arbitrarily, that 20 percent of the time spent with the CCD collections is contributed by managers, who are estimated to be paid at double the rate of technicians, or \$79.26 per hour.

Estimated Annual Burden and Cost in Reporting CCD Data

| Survey | Average Hours | Respondents | Total Hours | Total Cost |
|-------------------------------|----------------------|--------------------|--------------------|-------------------|
| Public School Universe | | 12 | | |
| Technician (\$39.63) | 42 | | 504 | \$ 19,974 |
| Manager (\$79.26) | 10 | | 120 | \$ 9,554 |
| Local Agency Universe | | 12 | | |
| Technician (\$39.63) | 30 | | 360 | \$ 14,267 |
| Manager (\$79.26) | 7 | | 84 | \$ 6,658 |
| State Nonfiscal Survey | | 12 | | |
| Technician (\$39.63) | 10 | | 120 | \$ 4,756 |
| Manager (\$79.26) | 3 | | 36 | \$ 2,853 |
| State Fiscal Survey | | 56 | | |
| Technician (\$39.63) | 69 | | 3864 | \$153,130 |
| Manager (\$79.26) | 17 | | 952 | \$ 75,456 |
| Total | | | 6,040 | \$286,648 |

Estimated cost to state respondents. Burden hours are estimated to total 6,040 a year. The total estimated cost to all state respondents is \$286,648.

A.13. Provide an estimate of the total annual cost burden to the respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14.)

There are no additional record keeping costs to the responding state education agencies. All information collected on the CCD is from administrative record systems and is already collected by the state for its own purposes as well as by EDEN.

A.14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost.

Method for estimating costs. Annual costs are based on current costs for the CCD. The costs include a 22 percent load on salaries for Department of Education staff. Contractor hours are also loaded costs.

Estimated Annual Cost of CCD to Federal Government

| Cost Type | 2006-07 |
|------------------|----------------|
| Dept ED Staff | \$509,172 |
| Census (IAD) | \$3,550,004 |
| Contracted Staff | \$430,000 |
| Training | \$616,000 |
| Total | \$5,105,176 |

Cost. Department of Education staff assigned to the CCD include two FTE GS/14 staff; one FTE GS/13 and one FTE GS-12. One-third FTE of the program manager's time is included; this person is a GS/15. Four full-time research assistants are employed through the Education Statistical Services Institute, a contractor to NCES.

Costs reported for the Bureau of the Census include staffing and other charges. The cost was estimated by assuming a 5 percent increase from 2005–06. The cost includes the full cost of salary, benefits, overhead, and fee. Please note that annual cost to the Government is anticipated to decrease in FY08, when CCD nonfiscal surveys are fully integrated with EDEN.

Training costs reflect the cost of general training and professional development for all CCD Coordinators at NCES's Summer Data Conference and the cost of the Management Information Systems Conference. These costs also include three-day training sessions at NCES for new CCD Fiscal and CCD Nonfiscal Coordinators. Training is separate for each group, and each group averages 10 new CCD Coordinators a year.

A.15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of OMB 83-1.

Burden to respondents. Burden to respondents changed from the previously approved collection, that for the 2005–06 school year, because it is expected that about 47 states will report via EDEN.

Federal costs. Increased costs to the Federal government are attributable to anticipated salary increases for Federal employees, and the addition of two contracted research assistants. These assistants are responsible for reviewing new and published CCD files; resolving questions from the public about locale code assignment, school ID, and other items used by Program Offices; and doing ad hoc statistical analyses for NCES and other data users. Note that cost savings should begin in FY08, as the nonfiscal CCD transition to EDEN is complete.

A.16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of reports, publication dates, and other actions.

Products. Sections C through F present each component survey in the CCD collection. These sections include tables that illustrate how the CCD data are typically presented as simple cross-tabulations, for example, average teacher/pupil ratio by state.

NCES’s web application, the School and District Locator, presents descriptive information for a single school or district. Build a Table, another web product, allows users to create their own lists, counts or cross-tabulations.

CCD data are published through web applications, as noted above, and short reports that typically include 10 to 20 tables of data presented by state and for the Nation.

Complex analytical techniques are not used with the CCD.

Timeline. The CCD 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.

| CCD Survey Collection, Processing, Publication | |
|---|--|
| February | Mail instructions to respondents, open website to receive data. |
| March | First reporting date. Training for new CCD Coordinators. |
| September | Close NPEFS file on Tuesday following Labor Day; close nonfiscal files September 30. No files are accepted for program funding purposes after close-out. |
| December | Preliminary files available for internal use but not publication. |
| February | Final per-pupil expenditure data available. |
| March | NCES review of files, file documentation, short reports. |
| May | Files become public. NCES web database updated. Dropout and completion rate file completed (derived from local education agency file). |
| June | Dropout and completion file becomes public. |
| July | Training for all CCD Coordinators. |

A.17. If seeking approval not to display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

NCES displays the OMB expiration date on instructions manuals sent to the state CCD Coordinators.

A.18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-1.

There are no exceptions to the items in that certification.