

SUPPORTING STATEMENT
FOR THE NATIONAL CENTER FOR EDUCATION STATISTICS
2007-2008 and 2009-2010 PRIVATE SCHOOL UNIVERSE SURVEY
Section A

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	5
A5. Small Business or Entities	5
A6. Frequency of Data Collection	6
A7. Special Circumstances of Data Collection	6
A8. Consultations Outside the Agency	6
A9. Payment or Gifts to Respondents	8
A10. Assurance of Confidentiality	9
A11. Need for the Use of Sensitive Questions	9
A12. Estimates of Information Collection Burden	9
A13. Capital and Operating Costs to Respondents	10
A14. Estimates of Cost to the Federal Government	10
A15. Changes in Burden	11
A16. Publication Plans/Time Schedule	11
A17. Request Not to Display Expiration Data	13
A18. Exceptions to the Certifications	13
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	
D Internet Reporting on Private School Survey (PSS) and the Schools and Staffing Survey (SASS)	
E. Examples of Table Shells	
F. List Request Letters	
G. 2005-2006 Private School Survey Questionnaire	

Request for Clearance for the Private School Universe Survey

This is a request for clearance from July 1, 2007 until June 30, 2010 to conduct the Private School Universe Survey (PSS). The 2007-2008 and 2009-2010 PSS collections, area-frame-development activities for the 2007-2008 PSS, and frame-development activities for the 2009-2010 PSS are covered by this time period.

A. JUSTIFICATION

AI. 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 Private School Universe Survey (PSS) to conduct national surveys of private elementary and secondary schools. The purposes of this data collection activity are 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. This survey is an on-going 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 Census Bureau to collect and process private school data. The Private School Universe Survey has been conducted biennially from 1989-90 to 2005-06. The most recent published data from this survey is from 2003-2004 PSS and the 2005-2006 PSS data are currently being processed.

The National Center for Education Statistics (NCES) of the Institute for Education Sciences (IES), U.S. Department of Education, 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 1970's. Recently, Schools and Staffing Surveys (SASS) for 1987-88, 1990-91, 1993-94, 1999-2000, and 2003-04 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 openings/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 Quality EducationData, are not complete and lack sufficient detail on school characteristics to select samples to 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. These purposes and related activities are parallel to the NCES Common Core of Data (CCD) for the public schools.

A3. Appropriate Use of Information Technology

Imaging and Computer Assisted Telephone Interview (CATI)

Information technology will be used in several ways for the 2007-2008 and 2009-2010 PSS collections. As in the 2003-2004 and 2005-2006 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 2007-08 and 2009-10 for mail nonrespondents (an estimated 30% of all responses will be collected by CATI).

Internet Data Collection

The 2001-2002 and the 2003-2004 PSS both offered an Internet response option¹. The 2001-2002 PSS incorporated an Internet response option test designed to explore the feasibility of collecting PSS data over the Internet and to measure the impact of including an Internet Response option on initial response rates. An Internet response option was offered to most schools in the 2005-2006 PSS. Adding an Internet response option has shown that a relatively small percent of respondents have chosen to respond by Internet and that adding an Internet option with a mail questionnaire

¹ See Section D – “Internet Reporting on the Private School Survey (PSS) and the Schools and Staffing Survey (SASS)” for a summary of the PSS and SASS experiences with offering Internet response options.

has a negative or neutral impact on initial response. Comparison of the 2001-2002, 2003-2004, and 2005-2006 PSS initial response rates show that the highest initial response rate (49.6%) occurred in the 2003-2004 PSS (no Internet option), the next highest initial response rate (46.5%) occurred in the 2001-2002 PSS (Internet option offered to approximately 1/3 of the schools), and the lowest initial response rate (45.7%) occurred in the 2005-2006 PSS (Internet option offered to nearly all schools). There were substantial costs in offering the Internet response, including the costs of authoring and testing the Internet instrument, hardware set-up help-desk support, to adding an Internet mode to the 2001-2002 and the 2005-2006 PSS. It was hoped that a higher initial response rate would lower follow-up costs that would offset the costs of adding the Internet instrument, but the Internet response option did not increase initial response rates.

Many surveys are able to make contact with respondents by e-mail, reducing the amount of time and costs for follow-up. E-mail messages can include a link to the online Internet questionnaire via a secured server, which makes it relatively easy to access and launch. Mail notification, as it has been done on the PSS (and SASS) surveys, requires the respondent to go to their computer, open their browser, and key in a user name and password. Thus far, the constraint for using e-mail notification on the PSS (and SASS) has been that e-mail addresses have not been available prior to data collection. But given the potential advantages of e-mail notification, and noting the lack of success in notification by mail, pursuing e-mail notification (subject to Privacy Act and data security provisions) appears to be a more promising direction for a PSS Internet response option.

The 2007-2008 PSS, will not offer an Internet response option, but will focus on the collection of school-level email addresses. These email address will be used to offer an Internet response option for the 2009-2010 PSS, employing email (rather than mail) notification of the Internet response option. Email messages will also be used as low-cost follow-up reminders.

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 (twenty-three 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 Private School Universe Survey 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. Consultation Outside the Agency

Key offices inside the Department of Education have reviewed the draft survey. Prior to the first Private School Survey 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
American Association of Christian Schools	Dr. Robert Stashesky
American Montessori Society	Ms. Bretta Weiss
Agudath Israel of America	Rabbi Morton Avigdor
Association of Christian Schools International	Dr. John Holmes
Association of Military Colleges and Schools	Lt. General Willard W. Scott
Association of Evangelical Lutheran Churches	Mr. Kretzman
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 Assoc.	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 October 2006. The following private school groups were represented at the October 2006 meeting:

American Association of Christian Schools	Jennifer Groover
Association of Christian Schools International	John Holmes
Association of Christian Teachers And Schools	R. Jay Nelson
Association of Military Colleges and Schools	Rudolph Ehrenberg, Jr.
Association of Waldorf Schools of North America	Richard Caro

Council for American Private Education	Joseph McTighe
Islamic School League of America	Judith Amri
Jewish Education Service of North America	Steven Kraus
Lutheran Church-Missouri Synod	Gene Ladendorf
National Association of Independent Schools	Susan Booth
National Catholic Educational Association	Dale McDonald
National Christian School Association	Philip Patterson
National Coalition of Alternative Community Schools	Pat Montgomery
Southern Baptist Association of Christian Schools	David Culpepper
U.S. Conference of Catholic Bishops	Marie Powell
Wisconsin Evangelical Lutheran Synod Schools	Jeff Inniger

A9. Payment or Gifts to Respondents

No incentive is being provided.

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. The information collected in the PSS is not considered to be sensitive; therefore, there is minimal risk that respondent cooperation from private schools may be adversely affected.

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

2007-2008 PSS

During development of the area-frame portion of the 2007-2008 PSS universe (see B2 below), approximately 8,880 screener calls will be made to institutions discovered in the area search to determine their eligibility for the PSS. The average length of these calls is 2.5 minutes, resulting in 370 hours of respondent burden for the area-frame screener operation.

Survey questionnaires will be sent to the universe of approximately 36,900² private schools in 2007-2008. The requested data can be easily obtained from school records. The average completion time will be 18 minutes (based on the 2005-2006 PSS experience) per respondent (approximately 33,300 schools *.80 response rate = 26,640), for a total of 7,992 hours of questionnaire respondent burden. The total respondent burden, screener (367) plus questionnaire (7,980) burden is 8,362 hours.

The standard NCES procedure for estimating costs to school staff is to multiply the estimated total survey reporting hours (8,347) 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 \$175,287 in FY 2007.

2009-2010 PSS

During the development of the list-frame portion of the 2009-2010 PSS universe (see B2 below), lists of private schools will be requested and received from approximately 105 state agencies and private school associations. It is estimated that each list response will take an hour resulting in 105 hours of respondent burden. Approximately 29,000 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 2.5 minutes, resulting in 1,208 hours of respondent burden for the list-frame screener operation. Total response burden for list-frame development is 1,313 hours.

Approximately 8,880 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 2.5 minutes, resulting in 367 hours of respondent burden for the area-frame screener operation. Total response burden for frame development is 1,680 hours (1,313 hour for the list-frame and 367 hours for the area-frame)

² In order to reduce respondent burden, the 3,600 private schools in the 2007-2008 Schools and Staffing Survey (SASS) sample will receive the SASS private school questionnaire only and not the 2007-2008 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 2007-2008 SASS burden hours.

Survey questionnaires will be sent to the universe of approximately 40,500 private schools in 2007-2008. The requested data can be easily obtained from school records. The average completion time will be 18 minutes (based on the 2005-2006 PSS experience) per respondent (40,500 schools * .80 = 32,400), for a total of 9,720 hours of questionnaire respondent burden. The total respondent burden, frame development (1,680) plus questionnaire (9,720) burden is 11,400 hours.

The standard NCES procedure for estimating costs to school staff is to multiply the estimated total survey reporting hours (11,400) 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 \$239,400 in FY 2009.

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

2007-2008 PSS

NCES estimates that the total federal cost for the 2007-2008 Private School Universe Survey is approximately \$2,863,581 (\$280,766 in FY 2006, \$1,203,762 in FY 2007 and \$1,379,053 in FY 2008). This estimate was compiled from individual estimates developed within each 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.

2009-2010

NCES estimates that the total federal cost for the 2009-2010 Private School Universe Survey is approximately \$3,097,248 (\$303,676 in FY 2008, \$1,301,990 in FY 2009 and \$1,491,582 in FY 2010). This estimate was compiled from individual estimates developed within each 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 2007-2008 PSS, 8,347 hours, is somewhat less than that of the 2003-2004 PSS, 9,600 hours, the last year that the PSS and SASS were collected in the same year. Much of the difference is due to the revision of the estimated completion time from 20 minutes (2003-2004 PSS) to 18 minutes (2005-2006 PSS).

The burden associated with the 2009-2010 PSS, 11,400 hours, is larger than the burden associated with the 2007-2008 PSS. This increase in burden is due to two reasons. First, the SASS is not

being collected in 2009-2010, so an additional 2,700 private schools will answer the 2009-2010 PSS questionnaire (900 hours). Second, the list-frame development for the 2007-2008 PSS took place during a period covered by the prior clearance, all of the 2009-2010 PSS frame development, with it's 1,313 hours of burden, will occur during this clearance period.

A16. Publication Plans/Time Schedule

2007-2008 PSS

The first mailing of questionnaires is be scheduled for October 1, 2007. A second mailout for schools that did not respond to the October mailout is scheduled for November 2007. Telephone follow-up for nonresponse and data consistency will begin in January 2008. Personal visit follow-up for mail noninterviews and CATI noninterviews is scheduled for January 2008 through April 2008.

The 2007-2009 PSS survey will be conducted according to the following time schedule:

- | | | | |
|----|---|--------------------|-----------------|
| 1. | Obtain OMB approval for the Private School Survey | 7/1/2007 | |
| 2. | Conduct Screener Calls for Area-Frame Schools | 9/1/2007-9/30/2007 | |
| 3. | 1st Survey Mailout | | 10/1/2007 |
| 4. | 2nd Survey Mailout | | 11/2007 |
| 5. | CATI/Field Followup | | 1/2008-4/2008 |
| 6. | Check-in, Clerical Edit, | | 10/2007-5/2008 |
| 7. | Process Data | | 11/2007-10/2008 |
| 8. | Final File | | 11/2008 |
| 9. | NCES Reports Results | | 5/2009 |

2009-2010 PSS

The first mailing of questionnaires will be scheduled for October 2009. A second mailout to the schools that did not respond to the October mailout will be scheduled for November 2009. Telephone follow-up for nonresponse and data consistency will begin in January 2010. Personal visit follow-up for mail noninterviews and CATI noninterviews will be scheduled for January 2010 through April 2010.

The 2009-2010 PSS survey will be conducted according to the following time schedule:

- | | | | |
|----|---|---------------------|-----------|
| 1. | Obtain OMB approval for the Private School Survey | 7/1/2007 | |
| 2. | Request Private School Lists | | 7/20/2008 |
| 3. | Conduct Screener Calls for List-Frame Schools | 8/15/2008-9/15/2008 | |
| 4. | Conduct Screener Calls | | |

	for Area-Frame Schools	9/1/2009-9/30/2010
5.	1st Survey Mailout	10/2009
6.	2nd Survey Mailout	11/2009
7.	CATI/Field Followup	1/2010-4/2010
8.	Check-in, Clerical Edit,	10/2009-5/2010
9.	Process Data	11/2009-10/2010
10.	Final File	11/2010
11.	NCES Reports Results	5/2011

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 Section E. for examples of table shells (for a more comprehensive set of tables see *Private School Universe Survey, 1989-90*, NCES 93-122, *Private School Universe Survey 1991-92*, NCES 94-350), *Private School Universe Survey 1993-94*, NCES 96-143, *Private School Universe Survey 1995-96*, NCES 98-229, *Private School Universe Survey 1997-98*, NCES 1999-319, *Private School Universe Survey 1999-2000*, NCES 2001-330, *Characteristics of Private Schools in the United States: Results From the 2001-2002 Private School Universe Survey*, NCES 2005-305, and *Characteristics of Private Schools in the United States: Results From the 2003-2004 Private School Universe Survey*, NCES 2006-319 – these reports are available upon request or can be accessed from the PSS web page at <http://nces.ed.gov/surveys/pss>). The Census Bureau will make the 2007-2008 data file available to NCES by November 2008. NCES will publish the 2007-2008 survey results in May 2009. The Census Bureau will make the 2009-2010 data file available to NCES by November 2010. NCES will publish the 2009-2010 survey results in May 2011.

A17. Request Not to Display Expiration Date

Not applicable.

A18. Exceptions to the Certifications

Not applicable.