

Supporting Statement

A. Justification

1. Necessity of the Information Collection

The purpose of this request for review is to obtain clearance for additional information to be collected in conjunction with the School Enrollment Supplement of the October Current Population Survey (CPS). Direct evaluation of household reports of high school completion in various federal studies has not been conducted. The CPS collects data from households about a range of issues. Data are collected through interviews with a single household member about all household members. These data have been used extensively by the Commerce Department, the Department of Education, the Department of Labor, and other agencies to study relationships between high school completion, or failure to complete, and a number of important life experiences such as labor force participation, earnings, and enrollment in postsecondary education. To the extent that there is error in the high school outcome measures, analyses of these relationships can be misleading. The additional information to be collected in the October 2008 CPS will help address questions about possible reporting error in the CPS high school completion data.

The Census Bureau has conducted the School Enrollment Supplement annually over the past 40 years. The Census Bureau, the Bureau of Labor Statistics, and the U.S. Department of Education sponsor this supplement.

The additional information to be collected from CPS respondents as part of the October 2008 CPS is shown in Attachment A. The questionnaire will be administered after the standard School Enrollment Supplement (see materials starting on page 8-1 at: <http://www.census.gov/apsd/techdoc/cps/cpsoct06.pdf> for a copy of the School Enrollment Supplement questionnaire). Attachment D includes the letters requesting graduation lists that will be sent to schools.

2. Needs and Uses

The additional information will be requested in two stages. During stage 1, 18- through 24-year-olds identified during the October CPS collection and in the outgoing rotations of the CPS sample in October 2008 will be asked a series of followup questions needed to determine what high school they last attended, what year they last attended, whether they graduated and with what type of credential, and what name they went by in high school. During the second stage of collection, the schools or school districts identified by CPS respondents will be contacted and lists of students who graduated within a specific time period will be requested. Census data processors will then compare the graduation lists to the CPS respondent reports of high school completion.

A summary of the stage 1 questions is presented here, followed by a discussion of the information requested of schools in the contact letter found in Attachment D.

I. Stage 1 CPS questionnaire items

Introduce study (See Attachment A: Items PRESUP and INTRO)

This material acts as a transition into the more detailed questions to follow and introduces the purpose of the study. Note that the variable EDUCA is shown in Attachment A. This is asked as part of the basic CPS, but is used to drive some of the wording in the additional questions so is shown in the stage 1 questionnaire.

Obtain name of the high school the 18- through 24-year-old last attended (See Attachment A: Items Q1A-Q1G)

In order to compare reports of high school completion by 18- through 24-year-olds sampled as part of the CPS to administrative record data archived by schools and school districts, a means of linking the two sources of data is needed. Having school name will allow us to locate the school and associated school district. This is essential for the second stage of the study during which we will contact identified schools (or their associated districts) to obtain graduation lists.

To facilitate efficient data collection, data from the Common Core of Data (CCD) and the Private School Survey (PSS) from the U.S. Department of Education will be preloaded into the Computer Assisted Interview program so that interviewers can verify school names with respondents during the interview. Data from the 1999-2000 and 2005-06 CCD and PSS collections will be used to drive the interactive school lookup. The 1999-2000 school year is the earliest year for which we expect to request information. Assuming that the 24-year-olds in the sample in October 2008 could have graduated as early as age 16, they could have graduated at the end of the 2000-01 school year. We are asking for information for a year before the reported graduation year so we would need completion information for as early as the 1999-2000 school year. The 2005-06 data are the most recent CCD/PSS data currently available. The lookup process will occur with questions Q1A and Q1B.

Because schools form and shutter or merge on a regular basis, it is possible that the school attended by the 18- to 24-year-old will not be included in the lists. If this occurs, interviewers will record the name of the school attended and its location as provided by the respondent in an open-ended response format using items Q1D through Q1G. Q1C is a verification question.

Determine type of high school credential, if any, from last high school attended (See Attachment A: Items Q2INTRO through Q2VERIFY)

The data collected here will be used to compare respondent reports of earning diplomas or alternative credentials against information obtained from the schools and school districts during the second stage of data collection. It is possible that we may

be able to coordinate work with the GED Testing Service to verify some of the alternative credential reports so the information would be useful provided that we can differentiate GEDs from other alternative credentials. The information will also allow us to study potential misreporting problems in terms of alternative credentials being perceived as regular diplomas by respondents, but not necessarily by the schools they attended. It will also be used to help analyze proxy reports, compared to self-reports, for cases where the respondents for the base CPS collection and for these additional education items are different.

Determine if subject earned a high school credential somewhere other than the last high school he or she attended (See Attachment A: Items Q3A through Q3C)

It is possible that a person could have earned a high school credential from a school or institution other than the last high school attended. Question Q3 addresses this issue.

Determine if a person listed as not having completed high school in the core collection might have actually earned a credential (See Attachment A: Items Q4INTRO through Q4OTHER)

Some respondents initially identified as not having earned a credential in the core CPS items may have actually done so and some respondents may not identify alternative forms of high school completion (e.g., through a GED) unless given further prompts. These questions probe for information about individuals reported as not holding any high school credential at the outset of the additional questions.

Determine the school or organization that issued a high school credential to subjects identified as having earned a high school credential though initially classified as a non-completer based on core CPS data. (See Attachment A: Items Q5A through Q5G)

In situations where the CPS core education data indicates that a person did not earn a high school credential, but the additional CPS questions fielded in stage 1 of the study indicate otherwise, these questions collect contact information for the school or organization from which the 18- through 24-year-old earned the credential.

Determine when the person obtained his or her credential(s) (See Attachment A: Item Q6)

To facilitate matching information collected through the additional CPS items to school rosters of graduates, it is important to be able to provide schools with time frames for which we would like a list of graduates. Information here will determine the school years for which such information will be requested during stage 2 contacts with schools.

Determine the name of the school the person last attended if he or she did not attend high school or earn a high school credential (See Attachment A: Items Q7A through Q7G)

In order to obtain as complete information as possible for the analysis, information about the name and location of school attended by those who did not attend high school or earn a high school credential will be determined.

Determine when last attended school if no high school credential was obtained (See Attachment A: Item Q8)

This information will help verify that a person did not obtain a high school credential from the last school he or she attended. As with item Q6, this information will be used to provide schools with a time frame for which we would like a list of graduates.

Obtain name of subject when he or she attended the school from which a high school credential was earned or when he or she last attended school (See Attachment A: Item Q9)

It is possible that the subject changed names between the time he or she last attended high school and the time of the CPS interview. It is important to capture this information if we are to accurately match information from the additional CPS items to school record information.

Verify credential receipt or lack thereof when data collected through the additional items appear to be contradictory (See Attachment A: Items Q10 and Q11)

In case the respondent appears to provide information suggesting that the subject both did and did not earn a high school credential through different parts of the additional questions, it is important to clarify the apparent discrepancy.

II. Stage 2 administrative record data collection

During stage 2 of data collection, letters will be sent to school districts and schools identified during stage 1 of data collection. Before letters are sent, Census Bureau interviewers will call school districts associated with the identified public schools to determine the most appropriate source of graduation lists for the schools during time periods ranging from 1999-2000 through 2007-08. If a public school district office indicates that district offices would be most appropriate, the district version of the letter would be sent to the school district contact identified in the district office. If the district indicates that the public school would be the most appropriate source, the public school letter would be sent to the person identified in the school. Phone contacts will not be made with private schools. Information request letters will be sent directly to private schools identified by respondents in stage 1.

The letters introduce the purpose of the study, information about how we decided to contact the district or school, and a request for lists of graduates for time periods listed in the letter. The letter provides contact information in case district or school representatives have questions and explains why we cannot simply ask about a particular individual. The letter will be accompanied by a preaddressed and stamped envelope that can be used to mail back graduation lists.

The lists will be cross checked against data collected in stage 1 by Census Bureau data processing staff.

3. Use of Information Technology

We deem the use of personal visits and telephone interviews, using computer-assisted

telephone interviewing and computer-assisted personal interviewing, the most appropriate collection methodology for stage 1 of the study given existing available information technology. We will use mail to deliver requests for graduation lists. Given the range of schools to be contacted during stage 2 of the collection, many schools will not have readily available electronic records that they can share going back as far as the 1999-2000 school year, which is the earliest year for which we anticipate needing information. Telephone contacts and personal visits will be used to followup with districts and schools when necessary.

4. Efforts to Identify Duplication

We are unaware of similar studies that have nationally representative samples of young adults. The National Education Longitudinal Study of 1988 (NELS:88) did collect information that has been used to evaluate the high school completion status of the cohort of 8th graders studied by NELS:88. However, the data are dated and collected through different means than CPS and related studies like the American Community Survey.

5. Minimizing Burden

Stage 2 data collection from potentially small schools and school districts was designed to minimize the amount of information requested and effort needed to compile and submit the information.

6. Consequences of Less Frequent Collection

If the data collection is not executed, the federal government will lack the ability to directly evaluate the utility of responses to the standard educational attainment item included in many federal data collections. The study is designed to be a one-time project.

7. Special Circumstances

There are no special circumstances.

8. Consultations Outside the Agency

The conceptual approach was discussed with several groups including individuals listed:

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Advance letters sent to CPS households provide respondents with an address and phone number at the Census Bureau to which they can submit general comments and questions about the survey. Letters sent to schools during the second stage of data collection also contain contact information for school and district personnel who might have questions (see attachment D).

9. Paying Respondents

We do not pay the CPS respondents or provide them with gifts.

10. Assurance of Confidentiality

We will collect these supplemental data in compliance with the Privacy Act of 1974. Each sampled household will receive an advance letter approximately one week before the start of the initial CPS interview. The letter includes the information required by the Privacy Act of 1974, informs each respondent of the voluntary nature of the survey, and states the estimated time required for participating in the survey.

Additionally, interviewers must ask each respondent if he/she received the advance letter and, if not, will provide a copy of the letter to each respondent and allow sufficient time for him/her to read its contents. Upon request, interviewers also provide households with the pamphlet on "How the Census Bureau Keeps Your Information Strictly Confidential," which reaffirms the confidentiality assurances and mentions the Census Bureau's past performance in assuring confidentiality. All information given by respondents to Census Bureau employees is held in strict confidence under Title 13, United States Code, Section 9. Each Census Bureau employee has taken an oath to that effect and is subject to a jail penalty and/or a

substantial fine if he/she discloses any information given to him/her. In addition to legal restrictions that individuals involved in the collection effort are subject to under Title 13, they are also subject to penalties associated with disclosure as defined in the Education Science Reform Act of 2002 (P.L. 107-279, section 183).

Each school and school district contacted during the second stage of data collection will receive a letter with similar information and assurances as that provided to households (see attachment D).

11. Justification for Sensitive Questions

The additional questions for the School Enrollment Supplement do not include questions of a sensitive nature, nor do questions asked of schools and districts during the second stage of data collection.

12. Estimate of Hour Burden

The total estimated respondent burden is 1,845 hours for fiscal year 2009. In stage 1, we assume that the additional questions, including time to work through identifying schools with respondents, will take approximately 5 minutes per person for the additional CPS questions. In stage 2, we assume it will take approximately 40 minutes for schools to identify proper school or district contacts, for the contacts to digest the information in the request letter, copy graduation lists for 3 years, and mail them back to the Census Bureau.

Approximately 3,000 18- through 24-year-olds will be eligible for the additional CPS questions. We anticipate a response rate of 90 percent. This accounts for 225 hours of the burden estimate for 2,700 individuals (3,000 cases times 90 percent times 5 minutes and converted to hours). We anticipate collecting lists of graduates from schools and school districts for 2,430 cases. This accounts for 1,620 hours of the anticipated burden (90 percent of 2,700 cases times 40 minutes and converted to hours).

13. Estimate of Cost Burden

There are no costs to the respondents other than that of their time to respond.

14. Cost to Federal Government

We estimate the cost to the government of the additional CPS questions to be \$525,000 in fiscal year 2009. We estimate the cost to the government of the school contact and graduation list collection and recording process to be \$1,175,000 in fiscal year 2009. The costs are to be borne by the U.S. Department of Education and the Census Bureau.

15. Reason for Change in Burden

Our estimated respondent burden is the same.

16. Project Schedule

We will conduct the additional CPS data collection in October 2008. We will conduct the school contact and graduation list compilation process during December 2008 and January through April 2009. We will publish advance reports within one year of completion of data collection.

17. Request to Not Display Expiration Date

The additional CPS questions will be administered as part of the School Enrollment Supplement to the CPS. The supplement bears an OMB control number and expiration date. The OMB control number and expiration date is included in the advance letter sent to CPS respondents. Because of these difficulties and anticipated respondent confusion involved with expressing a separate control number and expiration date to respondents for the additional questions, we do not wish to display the OMB control number and expiration date for the additional questions. We can include this in the letters we send to schools and districts.

18. Exceptions to the Certification

There are no exceptions to the certification.