

ATTACHMENT F

**HIGH SCHOOL COMPLETION
DATA VALIDATION
FEASIBILITY STUDY**

Summary Report and Recommendations

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Introduction

This report summarizes the recruitment procedures, sample characteristics, and the main findings of a series of cognitive interviews conducted by Child Trends for the Education Statistics Services Institute (ESSI) of the American Institutes for Research. This project was carried out on behalf of the National Center for Education Statistics (NCES) for a joint project with the Census Bureau. The interviews were designed to assess the feasibility of obtaining administrative data from high schools to validate the data collected on high school completion in the various national surveys including the Current Population Survey (CPS), the Decennial Census, and the American Community Survey (ACS). More specifically, the purpose of this study was to get feedback from principals on the feasibility of obtaining administrative records from schools regarding high school completers using three identified methods and, more generally, to assess the extent to which the requested task was clearly communicated to and understood by principals. A total of nine interviews were conducted with principals from public and private high schools from various regions of the country and representing schools of different sizes and locations.

The data collected suggests that the principals understand the request and in general would be willing and able to provide the administrative data needed to verify survey reports of high school completion. However, the difficulty associated with responding to the request and the preferred and/or most feasible method for doing so varied, in part with school and district size, the school record archival system, and the year for which the data would be requested.

The report is organized into two sections. The first section provides a brief description of the sample design, sample characteristics of respondents and the recruitment process. Section two describes the study's findings including feedback principals' provided on the sample letter from the Census Bureau and the three data options. Recommendations on how to improve upon various aspects of the proposed methods are highlighted in this report. The report concludes with suggestions by study participants on other data acquisition methods not proposed in the letter from the Census Bureau and an overall summary of findings.

Section I. Sample and Recruitment

This section outlines the creation of the sample frame, recruitment techniques, and the sample design used.

a. Sample Characteristics

Child Trends constructed the sample frame from which to identify and recruit principals for this study using data from the Common Core of Data: School Year 2005-06 (CCD) (which provide data on all public schools in the country) and the Private School Universe Survey, school year 2005-2006 (PSS).

Because laws governing the sharing of student information vary by states, a focus of the sample design and recruitment was to ensure that principals would be drawn from a range of states and from urban, suburban, and rural areas.

To create the public school sampling frame from the CCD, Child Trends created region and urbanicity groupings based on data contained within the CCD. Regions were created based on Census classifications of state groupings: Northeast, Midwest, South, and West. The Northeastern region consisted of nine states: CT, MA, ME, NH, NJ, NY, PA, RI, and VT. The Midwestern region consisted of 12 states: IA, IL, IN, KS, MI, MN, MO, ND, NE, OH, SD, and WI. The Southern region consisted of 17 states: AL, AR, DC, DE, FL, GA, KY, LA, MD, MS, NC, OK, SC, TN, TX, VA, and WV. The Western region consisted of 13 states: AK, AZ, CA, CO, HI, ID, MT, NM, NV, OR, UT, WA, and WY. Urbanicity was divided into 3 groups: Urban, Suburban, and Rural. A school was classified as being in an urban region if the location of the school relative to the populous area fell into either of the following categories: large or midsize city. A school was classified as being in a suburban region if the school was located in an urban fringe of a large city, urban fringe of a midsize city, or large or small town. A school was classified as rural if the school fell into any of the following categories: rural, outside Core based statistical area (CBSA) or rural, inside CBSA. A public school was eligible for inclusion in the study if it was listed as containing grade 12, was not missing information on urbanicity and region, and was located within one of the above-mentioned states. The sample frame was further restricted to those schools identified in the dataset as “Regular schools;” schools listed as “Special Education, Vocational, or Other/Alternative Schools” were excluded from the study.

To create the private school sample frame, schools were pulled from the PSS if they included 12th grade. A list of schools was generated from one state in each of the four regions. These states were: Massachusetts in the Northeastern region, Ohio in the Midwestern region, Georgia in the Southern region, and California in the Western region.

Public schools then were stratified into 12 strata defined by a combination of urbanicity and region and private schools were stratified into the four region strata noted above, for a total of 16 strata across public and private schools. Within each stratum, individual schools were assigned a random digit number and ranked in ascending order. Schools were then contacted to participate in the study in order as they appeared within their individual strata list.

In order to maximize regional diversity and urbanicity, priority was given to recruiting at least one school from each of the four regions and from an urban, suburban, and rural area. As summarized in table 1, a total of 2 private schools (a religiously-affiliated and a nonsectarian private school) and 7 public school principals participated in the study including private schools from the Southern (Georgia) and Western (California) region and public schools from: Northeast, Urban; Northeast, Rural; Midwest, Urban; Midwest, Suburban; South, Urban; South, Rural; and West, Suburban.

b. Recruitment

Study participants were recruited in January and February 2008. Three Child Trends staff members were trained in recruitment protocols under the supervision of the study coordinator. As calls were made to principals inviting them to participate in the study, both handwritten and electronic notes were made detailing the date and result of each phone call. Because principal names were not included in the CCD or the private school universe survey, Child Trends staff searched the Internet to identify the principal and confirm school telephone number. When the principal's name was not available on the Internet, Child Trends staff members identified themselves and asked to speak to the principal. If the principal was not available a message was left with the school staff that answered the call or on the principal's voice mailbox.

Recruitment calls were made throughout the day, staggered between the hours of 8:30am and 7:00pm EST to accommodate schools in different time zones. There were no patterns evident in terms of when principals were more likely to be available to talk with study staff about participating in the study. Once an interview was scheduled, a packet of materials was sent (see Appendix A) that included: 1) a cover letter from NCES thanking the principal for agreeing to participate, a brief description of the study, and the date and time of the call; and 2) the materials to be evaluated, which included a sample/mock letter from the Census Bureau requesting administrative records to verify high school completion data provided by a survey respondent along with three options through which the data could be provided, and a copy of Special Sworn Status Affidavit that would need to be filled if one of the three options was selected. Participants were asked to review the packet of materials prior to their scheduled interview. Study participants received a reminder call the day prior to the interview and a \$100 cash incentive after completing the interview.

A challenge in the recruitment process was getting in direct contact with the principal; gatekeepers such as secretaries and other school staff often filtered calls. To further facilitate the recruitment process and to help establish study legitimacy, an advance packet of materials was offered to principals and gatekeepers. This procedure was implemented halfway through the recruitment process. The advance packets included a modified NCES cover letter, the sample Census Bureau letter, and the affidavit of nondisclosure (see Appendix B). Advance packets were sent to contacted principals who requested additional information about the study before deciding to participate and those who expressed hesitation toward the study. The use of the advance packets did not yield its desired result as none of the principals that were sent the advance packets were recruited into the study.

During the recruitment process, a total of 220 schools were contacted resulting in 11 recruits and 9 completed interviews.¹ Of the public schools contacted 34 were in the

¹ Two of the principals recruited into the study did not complete an interview; one due to a scheduling conflict and the other because it was later determined that the individual was a high school counselor and

Northeast, Urban strata; 1 in the Northeast, Rural strata; 23 in Midwest, Urban; 4 in the Midwest, Suburban; 44 in South, Urban; 36 in South, Rural; and 3 in the West, Suburban strata. Additionally, 26 private schools in the West (Georgia) and 49 private schools in the West (California) strata were contacted to participate in the study.

Table 1: Key Characteristics of High School Principals

Key characteristic	Number of completed interviews	Number of schools called	Recruited participants
Public Schools			
Northeast, Urban	1	34	1
Northeast, Suburban	--	--	--
Northeast, Rural	1	1	1
Midwest, Urban	1	23	1
Midwest, Suburban	1	4	1
Midwest, Rural	--	--	--
South, Urban	1	44	1
South, Suburban	--	--	--
South, Rural	1	36	2
West, Urban	--	--	--
West, Suburban	1	3	1
West, Rural	--	--	--
Private Schools			
Northeast (MA)	--	--	--
Midwest (OH)	--	--	--
South (GA)	1	26	2
West (CA)	1	49	1
TOTAL	9	220	11

Section II. Study Findings

a. Overview

As noted above, the purpose of this study was to assess the extent to which the letter from the Census to principals requesting administrative records to validate respondent reports of high school completion was understood by principals and whether fulfilling such a request was feasible. The letter detailed three options through which the principal or school administrator could provide data on high school completers.

- Option 1 included the compilation of a list of all high school completers in a given year or span of years. The list is to be separated by year of graduation or include year of completion along with names of students listed in alphabetical order. Additionally, it was requested that the list include the credential earned by the student.
- Option 2 included having a staff member complete the Special Sworn Status affidavit. Once the affidavit is received by the Census Bureau, the staff member

not a principal.

- will be contacted with the name of the student and reported year of completion and asked to validate with school records the information.
- Option 3 consisted of having a Census representative visit the school or district to collect the needed data.

In the following section, the findings are summarized for the letter and each of the three options along with recommendations based on study findings.

b. Letter from Census Bureau

1. Main findings: All the principals, with the exception of one who appeared to have only glanced at the letter prior to the interview, initially reported that the letter was clear, and that they understood the task and the three options listed. Indeed, when asked, most were able to repeat the purpose of the letter in their own words. However, in subsequent questions several principals noted problems with the letter clarity. Together their responses suggested that while ultimately most understood the purpose of the letter, its purpose was not always evident on initial glance or communicated as clearly as possible. Several principals noted that the language was too technical, and that the letter was “too busy” or “too complicated.” Likewise, although everyone reported that it was clear that the Census would not release information about students (as was noted in the letter), several made comments throughout the interviews that suggested otherwise (see below). The principals had several suggestions on how the letter could be improved.

- The following are principals’ suggested improvements to the text of the letter:
 - Principals noted the letter contained a lot of information that could not be easily scanned—a feature that may be useful in garnering the cooperation of busy principals.
 - For example, one principal admitted to having to read the letter three or four times before he fully understood the letter.
 - A second principal reported that she had not realized that there were three separate options listed in the letter.
 - Another principal commented that because the letter was too complicated (i.e., the purpose was not quickly evident or request could not be quickly fulfilled), it would be filed as a “low priority”.
 - Specific recommendations were also made for the content of the letter:
 - For the introductory paragraph, principals suggested that more information could be added about the purpose of the study and why principals and other school officials should cooperate (i.e., why was this request was important for their schools).
 - The second to the last paragraph regarding privacy was regarded to be too technical by participants.
 - In the final paragraph, one principal suggested restating the purpose of the study.
 - One principal suggested adding some visuals such as graphics that could show principals how they could provide the information requested.

- Participants also provided several suggestions about supporting materials that could be provided along with or in conjunction with the letter:
 - Some public relations work should be done prior to sending out the letters so principals can receive advanced notice of this request.
 - Additionally, setting up a website for the study was suggested so principals could check the legitimacy of the study and collect any additional information.

2. Recommendations: Based on comments made during the interview, the following is suggested:

- To increase the readability of the letter and improve the visual presentation of information within the letter:
 - Increase the font size and margins of the letter so as to increase the readability of the letter and to make the letter appear “less crowded”.
 - Make the three options more evident by indenting and increasing the prominence of the bullets. Additionally, labeling or bolding each of options may help guide the reader and increase their ability to scan the letter. For example:
 - **Option 1:** Provide a list of students...
 - **Option 2:** Ask a staff member.....
 - **Option 3:** Call us at
 - Employ more accessible language and add more content on the purpose and value of the study for principals and individual schools.
 - To minimize the amount of information contained in the letter, it may be worth considering supplemental materials to outline the data options (e.g., a separate postcard or hand out), thereby limiting the letter to describing the purpose and importance of the study.
- Additional resources could be added to promote cooperation and establish study legitimacy.
 - Send advance materials such as flyers or postcards to targeted high school principals informing them that the data request is coming.
 - Create a website specifically for this study to establish its legitimacy and also offer it as a resource for principals to collect additional information and answer frequently asked questions.
 - As is already planned, materials should be printed and mailed in official Census Bureau or Department of Education letterhead and envelopes.

c. Option I

1. Main findings: All study participants reported that they would be able and willing to provide lists of high school completers by year of graduation. The ease of generating these lists varied by the year for which the request was made and the archival system.

When asked who would be the best person to provide lists of high school completers as requested in option 1, responses varied in part due to the archival system and the type of school. Best contacts included the principal, guidance counselor, curriculum director, district office, superintendent, registrar office, the chief accountability officer at a state-wide data acquisition site, and a school counselor with the help of a secretary.

- The following are noted differences regarding the best point of contact based on mode of archival and type of school
 - In general, the mode of archival will change the contact person best suited to obtain the information for option 1. If the data requested are fairly recent (e.g., prior school year or 1-2 years back), the principal would be the best point of contact. If further back (e.g., more than 2 years), it may be necessary to contact another office.
 - It is also important to note that the mode of archival has changed over time, so the ease of compiling lists of high school completers will vary by target year. The types of archival forms range from paper files, electronic files located in the school, and electronic files located in a centralized school district or state location.
 - The type of school also affected the process with which option 1 would be carried out. For three of the smaller schools, the principals reported that they could easily do it themselves because the data were readily available in their office. A large urban school reported that the task would be huge, especially if request were made for lists of completers going back in time. In a couple of cases, schools within larger school districts had state-wide data acquisition and storage sites. These sites were reported to be the best source for this information for schools in Ohio and Philadelphia. Additionally, a principal from Kansas noted that the state was instituting a new centralized state-wide data center within the next year where all high school completion data would be stored.
 - Data collected throughout the interviews suggests that the school superintendents may be best or most appropriate contact for the majority of schools. For example, some principals need superintendent approval to provide the information and others noted that superintendents were more likely than principals to forward the letter to the appropriate personnel or office. One principal noted that if the letter landed on her desk, she may not forward it to the right office or contact person, but a Superintendent would probably do so. On a related note, when directing option 1 to a particular school official, respondents made a distinction between those who would need to approve the request and those who would compile the lists, with each noting that the letter or request should first go to the principal or superintendent for approval.

2. Recommendations:

- Depending on the type of school and year of data requested, Census should consider contacts other than the principal when sending out this data request.

- To increase the likelihood that the data are provided by schools, the Census may want to consider increasing the ease or reducing the burden associated with such requests.
 - For example, limiting data requests to the prior or recent school years will likely minimize the effort and time need to fulfill the request by schools.
 - Allow schools to provide the list in the format and with the information that is easiest for them to do so. For example, some schools find it is easy to provide the lists with only the information requested (name, year of completion, and credential), while others report that it is easiest for them to provide the list along with all the information that is contained in their records.
- For requests for multiple years or for schools in larger school districts, it may be necessary to build in a longer response time in order to allow permission from multiple parties to be obtained, the channeling of the letter to appropriate parties, and the compilation of records across various archival systems and/or locations.
 - For example, one principal noted that she would prefer to get a one-year notice before any expected deadlines for this task.

d. Option II

1. Main findings: In general, principals reported that they would be able to provide data through Option 2 in which high school completion reports would be verified for specific student(s). All the principals reported that school staff would most likely be willing to sign the Special Sworn Status form if approval was received from the appropriate school officials (such as a principal or superintendent). Although principals expressed willingness and an ability to provide data as indicated in Option 2, several expressed concerns and/or hesitation with this option, described in detail below. Additionally, school personnel who would conduct such a search and complete the Special Sworn Status form varied across the schools included in the study.

- When asked who would conduct a specific student record search, principals again provided a long and varied list of school personnel.
 - Five principals reported the same school personnel member that they had reported as the best contact for Option 1.
 - In total, the best contact for Option 2 reported by principals included the principal, curriculum director, superintendent, director of guidance, secretary to the assistant principal, registrar, office of assessments, and counselor.
- All principals indicated that the staff member who would carry out the records search would be willing to fill out, sign, and notarize the Special Sworn Status form with a few caveats.

- Mainly, principals expressed concern that the task as described in Option 2 might be clerically cumbersome or take too much time and effort to perform, in particular if several student records were requested and if the requests were made for several years.
 - Indeed some noted that if they thought the task was going to take too much time and effort, they would not follow through with this option.
 - One principal recommended that data could be broken up into groups or years so the task might be less burdensome on staff.
 - Principals were concerned whether the Special Sworn Status form would have to be signed for each requested case or if one form would cover all requests.
- Several principals also noted that the staff member completing this task and signing the form would need approval from more senior staff and possibly students or parents.
 - One principal noted that the person carrying out the search would need approval from the director of student services who would also sign the form but not perform the search. It is unclear if this would be appropriate from the perspective of the Census Bureau or NCES.
 - Another principal noted that officials at the school district level would have to give their approval for the task.
 - A third principal noted that district or state laws would likely require the consent of a parent before data for a specific student could be released. In this case, the principal cited a law entitled “Objection to Release of Directory Information”² that requires parents to sign a release before their student’s directory information can be released. The principal was unsure whether this law would apply to the current data collection and/or whether consent would be needed from the student who presumably would now be of legal age.
- When principals were asked whether they could verify completion status of separated students, 8 of the 9 schools said that they would be able to.
 - Seven schools said that they would be able to verify completion status so long as the request is for a fairly recent year.
 - One principal said that they would be able to provide this information if the student completed at their school, otherwise they would need to contact the school where the separated student went.

² Here we summarize the information that was provided by the principal regarding the Objection to Release of Directory Information Law. “The school district has designated certain categories of student information as directory information. Directory information includes a student’s name, address, telephone number, date and place of birth, major course of student, participation in school activities or sports, weight and height of a member of an athletic team, dates of attendance, degrees and awards received, most recent school attended, class schedule, photograph, email address, and class roster. If you [parent] object to the release of any or all of the directory information listed above, you must do so in writing within 10 business days of receiving this notice.”

2. Recommendations:

- To address the concerns raised by principals it may be beneficial to limit the use of this option to cases in which only a small number of verification requests are made of the school.
- Alternatively, if possible the requests under this option may be more easily carried out if they are limited to one year and/or to a small number of recent years. As noted above, several principals noted that data for recent school years was stored electronically and easily searched.
- A third option is to note in the letter the number of students for whom verification data is requested so that the school can better assess the viability of Option 2.
- Based on the feedback received, it may be necessary to clarify in the letter whether separate forms are needed for each individual request or whether one form will cover all requests. Additionally, it may be important to clarify whether or not the person conducting the search must be same person completing and signing the Special Sworn Status form.

e. Option III

1. Main findings: Seven of the nine principals said that the data request could be carried out under Option 3 in which a trained Census staff member with security clearance would visit the school to collect the needed information. As in the case with Option 2, three of seven principals noted that they would need approval from senior administrators at the school district or school board level and several voiced concerns.

- In general, while principals noted that in theory this option would be possible they had concerns regarding student confidentiality, the approval process (see above), and ease with which an outsider could collect the data.
 - Principals seemed more apprehensive of this option than the others and two mentioned specifically that confidentiality would have to be guaranteed before allowing access to school records.
 - Three principals said that they would need to get permission from the superintendent, school board of education, or a school district official.
 - Another principal appeared resistant to this option because he thought permission would be needed from parents and students before information could be released to a data collection specialist.
 - One principal said that their school would not choose this option because the first option was easier for them.
- Centralized data sites were also brought up as a possible option by one principal to allow for collection of data from a number of schools at once.

2. Recommendations:

- Since several principals noted that they would need approval from the superintendent or school board in order to allow a data specialist access to their

- records, the process may run more smoothly and efficiently if the letter and request are first sent to superintendents.
- Given the concerns raised regarding confidentiality, it may be useful to highlight and/or separate the sentence in the letter to principals noting NCES's and the Census Bureau's commitment to privacy. Additionally, noting that the data specialists are trained in maintaining confidentiality and privacy of students under the description of option 3 may help alleviate concerns. Although, as noted above, all principals interviewed reported that it was clear that data would remain confidential, the concerns raised with regard to this option suggest that they either needed additional reassurance regarding confidentiality specific to this option or that the "privacy" statement was viewed as a separate pledge.

f. Additional information

1. Main findings: In addition to getting feedback on the letter and data collection options, principals were asked whether they could provide information for completion credentials other than regular high school diplomas and whether there were other methods or options not described in the letter through which they could verify high school completion.

- Responses to a question regarding whether they could provide information for completion credentials other than a regular high school diploma suggested that the question was not entirely understood by several respondents. In response to the question on other credentials:
 - Principals seemed to focus on GEDs and credentials earned at alternative sites outside of the high school.
 - Some principals also mentioned Regent, advanced or honors diplomas issued to students.
 - A third principal in California reported that beginning in the next school year students who do not pass the high school exit exam would earn a "certificate of completion" rather than a high school diploma and that, if needed, Census could request information regarding the type of credential earned be included.
- Several participants noted additional options to collect information on student completion credentials.
 - Several principals noted that centralized state or local data storage systems could provide an efficient way to verify student completion data. The following centralized systems were noted:
 - KIDS program in Kansas
 - New York State Report Card
 - Data Acquisition Sites (A-Sights) in Ohio
 - One principal in the Urban Midwest said that it would be easy to call individual schools to get information about individual students over the phone. This principal also explained that in the near future, it may be possible to send full student transcripts on an individual basis.

Summary

Interviews to assess letter clarity and the feasibility of providing data under the three options were conducted using an interview script and pre-developed probes found in Appendix C. Interviews were conducted by three Child Trends staff members experienced in standardized and cognitive interviewing and overseen by the study coordinator. The study main findings include:

- **Recruitment of study participants:** Recruitment for study participants took approximately four weeks. A significant challenge in the recruitment process was getting in direct contact with the principal; gatekeepers such as secretaries and other school staff often filtered calls. To facilitate the recruitment process and to help establish study legitimacy, an advance packet of materials was offered to principals and gatekeepers. However, these advanced materials did not yield its desired results. In total, 220 schools were contacted, resulting in 11 recruits and 9 completed interviews. The low levels of cooperation observed in the current study may indicate the need for more rigorous methods to improve response among principals and school administrators in the actual data collection.
- **Clarity and comprehensibility of letter:** Though all but one principal noted that they understood the purpose of the letter, several principals noted that the letter was not as written as clearly possible, that the language was too technical, and that the letter was “too busy” or “too complicated.”
- **Feasibility of providing administrative data on high school completion:** All of the principals noted that they would be willing and able to provide administrative records of high school completion. The ease with which they would be able to provide administrative data on high school completion, however, varied with the year for which the request was made and mode in which the records were stored. In general, data on high school completers for the prior and recent school years could be provided with relative ease. In some schools, data from less recent years were stored in less accessible mediums (e.g., hard copy records vs. electronic files) or in other locations (e.g., central office).
- **Feasibility of three data provision options:** All principals indicated an ability to produce lists of high school completers for a given year as detailed in the first option, and to varying degrees appeared to have a preference for this option. Many principals were also willing to provide data through the second and third options of data collection, but their willingness to do so depended on how complicated or large the data request would be and how the records were stored. Several also noted that they would need to request permission from their superintendent, school district or board to provide this type of data, with many noting this in reference to Options 2 and 3. A number of people were identified as the appropriate point of contact to obtain the data. The best point of contact

appears to depend largely on the school and the mode of data archival for the year requested.

Appendix A:
Introductory letter to cognitive research



U.S. DEPARTMENT OF EDUCATION
INSTITUTE OF EDUCATION SCIENCES

NATIONAL CENTER FOR EDUCATION STATISTICS

[DATE], 2008

Dear [NAME],

Thank you for agreeing to participate in this important research study. This study is being conducted by Child Trends, a nonprofit research organization in Washington DC, for the National Center for Education Statistics, U.S. Department of Education.

The purpose of this study is to help improve our ability to evaluate the accuracy with which high school completion data are reported by individuals, by comparing individual reports of high school completion to administrative records. Results from the study will affect how high school completion is measured across numerous surveys. To improve the study, we are seeking feedback on some possible methods of obtaining administrative records from schools.

Enclosed is a copy of the letter and other materials that we would like to ask you about during the phone interview. Please review the letter and materials before the interview. During the phone interview, we will ask you about your ability to provide the administrative information requested. **It is not necessary for you to provide the administrative information at this time.**

Your participation in this study is completely voluntary and your responses, which will be combined with those of others, will remain confidential. Your answers will be used only for research purposes in order to improve the collection of high school completion data and will not be disclosed, or used, in identifiable form for any other purpose except as required by law.

As a token of our appreciation, you will receive \$100 following the completion of our interview, which should last about 20 minutes.

[REDACTED] from Child Trends will be calling you on [DATE] at [TIME][TIME ZONE] to conduct the interview. You will also receive a reminder call the day before. If you have any questions before then, please feel free to call or email the study coordinator, Lina Guzman, at 1-866-717-4485 or lguzman@childtrends.org.

I thank you for your participation and interest.

Sincerely,

Chris Chapman
Project Officer
National Center for Education Statistics
U.S. Department of Education



U.S. DEPARTMENT OF EDUCATION
INSTITUTE OF EDUCATION SCIENCES

NATIONAL CENTER FOR EDUCATION STATISTICS

[DATE], 2008

Dear [NAME],

[NOTE: This modified letter was faxed or emailed along with the study materials (Appendix B) if the school or contact requested advance materials to confirm study validity.] This study is being conducted by Child Trends, a nonprofit research organization in Washington DC, for the National Center for Education Statistics, U.S. Department of Education.

The purpose of this study is to help improve our ability to evaluate the accuracy with which high school completion data are reported by individuals, by comparing individual reports of high school completion to administrative records. Results from the study will affect how high school completion is measured across numerous surveys. To improve the study, we are seeking feedback on some possible methods of obtaining administrative records from schools.

Enclosed is a copy of the letter and other materials that we would like to ask you about during the phone interview. Please review the letter and materials before the interview. During the phone interview, we will ask you about your ability to provide the administrative information requested. **It is not necessary for you to provide the administrative information at this time.**

Your participation in this study is completely voluntary and your responses, which will be combined with those of others, will remain confidential. Your answers will be used only for research purposes in order to improve the collection of high school completion data and will not be disclosed, or used, in identifiable form for any other purpose except as required by law.

As a token of our appreciation, you will receive \$100 following the completion of our interview, which should last about 20 minutes.

If you have any questions before then, please feel free to call or email the study coordinator, Lina Guzman, at 1-866-717-4485 or lguzman@childtrends.org.

I thank you for your participation and interest.

Sincerely,

A handwritten signature in black ink that reads "Christopher Chapman".

Chris Chapman
Project Officer
National Center for Education Statistics
U.S. Department of Education

Appendix B:
Advance packet of materials offered to principals

<PRINCIPAL NAME>
<SCHOOL NAME>
<ADDRESS1>
<ADDRESS2>
<CITY>, <ST> <ZIP>

Dear Superintendent or Principal,

I am writing to ask for your support on an important national study being conducted by the U.S. Census Bureau and the National Center for Education Statistics (NCES), the statistical agency of the U.S. Department of Education. The purpose of this study is to evaluate the accuracy with which high school completion data are reported by individuals, by comparing individual reports of high school completion to administrative records. Results from the study will affect how high school completion is measured across numerous surveys. In the initial stage of this study, we asked adults if they had completed high school and, if so, with what credential. We then asked them where and when they last attended high school. Your high school was named by respondents, and in this stage of our study, we are asking for your assistance to verify the information provided.

Due to Title XIII confidentiality laws governing data collections undertaken by the Census Bureau, we are unable to immediately provide you with the name(s) of the former students who listed your high school. We would like to obtain the necessary information from you in one of three ways. Please choose whichever way is most convenient for you from the following options:

- Provide a list of students who graduated from your school from <year> through <year>. Please separate the list by year of graduation or include the year of completion next to each name. If possible, please include the credential the student received and provide the list in alphabetical order by last name. Please note that the individuals will not be contacted by either the Census Bureau or the Department of Education. The list will be destroyed once we finish comparing the data.

If you can provide a list of graduates for <year> through <year>, please mail it in one of the enclosed pre-addressed, postage-paid envelopes. Please use whichever envelope best accommodates the volume of the materials you are returning.

- Ask a staff member who could access the requested data to sign the enclosed privacy agreement and have it notarized. Once we receive the privacy agreement, we will contact this person with the student(s)' name(s) and reported school-separation date(s) so that he or she can verify the information for the student(s) who reported attending your school. Please mail this form in the letter-sized envelope enclosed.
- Call us at (*phone number*) to schedule an appointment for a trained Census Bureau representative with data security clearances to visit your school or district office to collect the data.

As a matter of policy, both the U.S. Census Bureau and NCES are committed to the protection of the privacy of schools and individuals that participate in our surveys. The collection of information in this survey is authorized by laws governing the Census Bureau (Title XIII USC). It is also authorized by laws governing the U.S. Department of Education, including the Family Education Rights Act (FERPA) (Title XX USC 1232g). Your responses are protected from disclosure by federal statute (P.L. 107-279, Title I, Part E, Sec. 183). All responses that relate to or describe identifiable characteristics of individuals may be used only for statistical purposes and may not be disclosed, or used, in identifiable form for any other purpose, unless otherwise compelled by law.

We look forward to working with you and your staff. If you have any questions, please feel free to call our respondent hotline at xxx-xxx-xxxx.

Sincerely,
Census Bureau Officer

U.S. Census Bureau

SPECIAL SWORN STATUS

PART A - IDENTIFICATION				
1. Name – Last, first, middle		2. Date of birth		Month Day Year
3. Place of birth – City and State or Country		4. Social Security Number		
Citizenship		Home telephone number		
5. Local home address		Home telephone number		
6. Name and address of present employer		7. Prior investigation contact:		
		Telephone number		

PART B - WAIVER OF COMPENSATION	
I, the undersigned, offer my services to the U.S. Census Bureau with Special Sworn Status on a voluntary/contractor basis without compensation. On behalf of myself and my heirs and assigns, I release and discharge the Government of the United States from any claims, suits, or demands that I or my heirs or assigns may, can, or shall have in connection with compensation for my volunteer/contractor services for the Government of the United States.	
Signature	Date
Witness signature	Date

PART C - AFFIDAVIT OF NON-DISCLOSURE	
I, _____, do solemnly swear (or affirm) I will not disclose any information contained in the schedules, lists, or statements obtained for or prepared by the U.S. Census Bureau to any person or persons either during or after appointment. (Under title 13, U.S.C. section 214 and title 18, U.S.C. 3551, et. seq., the penalty for unlawful disclosure is a fine of not more than \$250,000 or imprisonment for not more than 5 years, or both.)	
_____ (Signature of appointee)	
Subscribed and sworn (or affirmed) before me this _____ day of _____, 20____,	
at _____ (City), _____ (State).	
[SEAL] _____ Signature	
My commission expires _____ Title (Officer/Notary Public)	
NOTE – The oath of nondisclosure must be administered by a person specified in 5 U.S.C. §2903. The word "swear" wherever it appears above should be stricken out when the appointee elects to affirm rather than swear to the affidavit; only these words may be stricken and only when the appointee elects to affirm the affidavit.	

PART D - DIVISION/OFFICE AUTHORIZATION				
1. Work location	a. Div. & Org. code	b. Census facility	c. Non-Census	2. Date
	d. Room	e. Office telephone number		Start
				Proposed end
4. Approving Census Official	a. COTR/Division Chief – Type			3. Special access: (Attach documentation)
	c. Signature			b. Approver's telephone number
			d. Date of request	

PART E - TO BE COMPLETED BY SECURITY				
1. Approved by Security	2. Badge issued for – Specify time limit. →	3. Fingerprints required <input type="checkbox"/> Yes <input type="checkbox"/> No	4. Renewal <input type="checkbox"/> Yes <input type="checkbox"/> No	5. Badge issued <input type="checkbox"/>

**EXPLANATION OF SPECIAL SWORN STATUS
(BC-1759)**

Part A: Completed by the special sworn/contractor. Contractors who are not U.S. citizens should bring INS documentation with them.

Part B: Signed by the special sworn/contractor in the presence of a witness. The witness should be either a Census Bureau employee authorized by the Security Office or a notary public.

Note: Signature for Part B of the BC-1759 is a Human Resources Division requirement. Individuals working as contractors or volunteers are not paid employees of the U.S. Census Bureau; therefore, they do not receive the benefits of the Bureau's payroll system. Volunteers receive no compensation. Contractors are paid through a contractual agreement with the Bureau's procurement office or sponsoring division.

Part C: Signed by the special sworn/contractor in the presence of either a Census Bureau employee authorized to administer the oath of non-disclosure or a notary public.

Note: Special sworn/contractors who refuse to sign Part C **will not** be allowed to have access to Census Bureau facilities or information.

Part D: Signed by the authorized Contracting Officer's Technical Representative (COTR) or the sponsoring Division Chief.

Note: Part D **MUST** be completed **before** the Security Office will initiate any action on the security processing or issuance of a building pass. Special Access includes 24-hour access and proxy card access, which require additional documentation. For further information, contact the Security Office. The authorized signature in Part D indicates that the COTR or Division Chief is responsible for the actions of the special sworn/contractor.

Renewals: Contractors complete Part A of BC-1759, and COTR or Division Chief completes Part D. Contractor brings completed form to Security Office for approval.

**Appendix C:
Cognitive interview script**

Cognitive Interviewing Script for Principals – High School Completion Validation Study

Hello. This is _____ from Child Trends calling about the high school completion study. [If necessary: My colleagues from NCES/AIR are on the line./ My colleague (Andrew Rivers/Sherylls Valladares/Lina Guzman is also in the room and will be helping me to take notes.] This interview will be audiotaped. Before I begin, I need to ask for your consent to participate in the interview. Then I will begin recording and will repeat the consent portion before starting the interview.

Your participation in this study is completely voluntary and your responses, which will be combined with those of others, will remain confidential. Your answers may be used only for research purposes in order to improve the collection of high school completion data and may not be disclosed, or used, in identifiable form for any other purpose except as required by law. If we come to a question you do not wish to answer please let me know and I will move on to the next question.

Is it okay to start recording?

YES, Continue

NO, Terminate the interview.

Great. As I mentioned, your participation in this study is completely voluntary and your responses, which will be combined with those of others, will remain confidential. Your answers will be used only for research purposes in order to improve the collection of high school completion data and will not be disclosed, or used, in identifiable form for any other purpose except as required by law. If we come to a question you do not wish to answer please let me know and I will move on to the next question.

Have you had a chance to read and review the packet of information that we sent you?

IF NO: So that the questions I'm going to ask you make the most sense, why don't you take a few minutes to read and review the materials. Feel free to take your time and just let me know when you are done.

1. Thinking about the letter, was the purpose of the study made clear in the letter?

IF NECESSARY: Can you tell me about what was unclear?

2. Were the different data collection options clear in the letter?

IF NECESSARY: Which option(s) was unclear?

IF NECESSARY: What was unclear about the option?

3. The letter that we are testing asks you to provide lists of graduates and other completers with some kind of indication of how the students completed, that is, with a regular diploma or with some other kind of credential. The information would be collected by the Census Bureau and individual-level data would not be released.

3a. Are you the best person to contact about getting this information?

IF R NOT BEST PERSON: Who do you think would be the best person to contact to get this type of information?

PROBE: Would it be better to send (this request to collect information on graduates and other completers) to a school district official?

3b. Would you be able to provide lists (of graduates and other completers) like this?

IF NO: Is there anything that could be done in order to make it possible for you to provide such lists?

**If no "R not able to provide list",
GO TO question 8. If yes, continue.**

4. Some of the lists that may be requested might go back as far as the 1998-1999 school year. Could information from that school year be provided?

4a. If we collect information in October, could you provide data from the prior school year and summer? (For example, if we request to collect information from your school in October of 2008, could you provide data for the 2007-08 school year and the summer of 2008?)

IF NOT: What is the most recent year of data you could provide?

5. Can students in your school earn completion credentials other than regular high school diplomas?

6. Would the lists you provide differentiate regular diplomas from other types of completion credentials?

7. We will only request that the list include student name, credential type and year completed. Some principals might find it easier to send us completion lists with all the information that is currently stored in their records. Others may find it easy to simply pull the pieces of information that we are requesting. Which would be easiest for you?

IF EASIER TO SEND "AS IS": What information other than student name, credential type and year completed, would be included in your list?

8. If we provide a student's name and year of separation from your school, would you be able to verify if the student completed or did not complete high school?

9. As you may recall, one of the options described in the letter request that a staff member complete a privacy agreement. For data security purposes, if we ask for information about a specific student, the person looking up the student's completion status would need to fill out, sign, and notarize the Special Sworn Status form that was included in the materials you received.

9a. Could you identify the title or position of the person who would do the record search?

IF APPROPRIATE: Who do you think (or what would be your best guess about who) would be the best person to perform this search?

IF NECESSARY: What is their title or position?

9b. Do you think that person would be willing to fill out, sign, and notarize the Special Sworn Status form?

10. If the Census Bureau sent a trained data collection specialist with security clearances to view sensitive information, could that person be given access to your student records to determine the completion status of a specific student or to produce graduation lists for a given year?

IF APPROPRIATE: Can you tell me a little about why it would not be possible to give a specialist from the Census with security clearances access to your student records?

IF NECESSARY: Would that be to determine the completion status of a specific student, to produce graduations list for a given year or both?

11. Was it clear from the letter that the Census Bureau would not release information about individual students from your school?

12. Do you have any suggestions for improving the letter?

13. Are there any other options for obtaining the information on graduates and other completers that we haven't described in the letter?

Thank you. Those are all the questions that I have. Is there anything that we did not cover that you would like to share?

I'm going to turn the recorder off now so that I can verify the address we should send the \$100 incentive to.