

1 **SUPPORTING STATEMENT**
U.S. Department of Commerce
U.S. Census Bureau
October School Enrollment Supplement
OMB Control Number 0607 - 0464

A. JUSTIFICATION

1. Necessity of Information Collection

The purpose of this request for review is to obtain clearance for the supplemental inquiry concerning school enrollment to be conducted in conjunction with the October Current Population Survey (CPS). The proposed questions are shown in Attachment A.

a. Basic Annual School Enrollment Items

The School Enrollment Supplement is jointly sponsored by the U.S. Census Bureau, the Bureau of Labor Statistics (BLS), and the National Center for Education Statistics (NCES). A number of questions in this supplement may appear in the American Community Survey (ACS) and in other demographic surveys. However, this supplement's comprehensive set of questions:

- does not duplicate any other single information collection, and
- ensures the historical continuity of a data series that spans over 4 decades.

b. Additional Items

In October 2009, the School Enrollment Supplement will only include the basic items, as noted above. No additional questions will be asked.

Title 13, United States Code, Section 182 and Title 29, United States Code, Sections 1-9, authorize the regular collection of this information.

2. Needs and Uses

Information quality is an integral part of the pre-dissemination review of the information disseminated by the Census Bureau (fully described in the Census Bureau's Information Quality Guidelines). Information quality is also integral to the information collections conducted by the Census Bureau and is incorporated into the clearance process required by the Paperwork Reduction Act.

This data series provides basic information on enrollment status of various segments of the population necessary as background for policy formulation and implementation. The CPS October supplement is the only annual source of data on public/private elementary and secondary school enrollment and characteristics of private school

students and their families, which are used for tracking historical trends and for policy planning and support. The basic school enrollment questions have been collected annually in the CPS for 50 years. Consequently, this supplement is the only source of historical data – at the national level – on the age distribution and family characteristics of college students, and on the demographic characteristics of preprimary school enrollment. As part of the federal government's efforts to collect data and provide timely information to local governments for policymaking decisions, this supplement provides national trends in enrollment and progress in school. Discontinuance of these data would mean not complying with the federal government's obligation to provide data to decision makers on current educational issues and would disrupt a data series that has been in existence for 50 years.

Needs and Uses of Basic Annual School Enrollment Items

- a. Items for Adults on Basic School Enrollment (See Items SSCHOL, PUBLIC, and GRADE on Attachment A)

Institutions responsible for the education of preprimary, elementary, secondary, college, and vocational students use the basic school enrollment data collected in the October supplement. These institutions include federal agencies; state, county, and city governments; and private organizations. Employers and analysts who need current information on the educational characteristics of the population to anticipate the composition of the labor force in the future also use these data. As part of its mission as the primary collector and distributor of data on the American work force, the BLS publishes a wide array of data about school-age youth. Since 1959, the BLS has relied on the October supplement to the CPS to supply labor force data on youths by their school enrollment status. This single statistical series includes historical trends on the hours worked, occupations held, and unemployment rates of youths by whether they are full- or part-time students, recent high school graduates or dropouts, or attending any type of vocational school.

Although we obtain current enrollment status for 16- to 24-year-olds monthly in the CPS basic program, the BLS and the Census Bureau are still dependent on the CPS October supplement questions to obtain recency of high school graduation or dropping out to analyze the impact of these events on the labor force participation of young adults.

- b. Items for Children on Basic School Enrollment (See Items SCH35, SCH614, CHPUB, and CHGRDE on Attachment A)

The October supplement has included the items that concern nursery and kindergarten enrollment of 3- and 4-year-old children since 1967. These questions are designed to measure differences between social and economic groups in the extent to which young children are exposed to nursery school and

kindergarten experiences before entrance into regular school. The BLS uses these data in comparing labor force status of mothers with young children enrolled and not enrolled. Enrollment rates in public and private schools by demographic characteristics, such as income, provide policy-relevant information on access to public and private schools.

- c. Items on Higher Education (See Items FULL, STYPE, VOCA, and LASTYR on Attachment A)

In addition to providing data on school-age children and young adults, this supplement provides a total aggregation of all people enrolled in or recently graduated from high school and enrolled in college or vocational school. The basic school enrollment data also show the total number of adults returning to school to complete high school or to obtain post-secondary education. The school enrollment data for adults of all ages are essential in understanding both changes in the "quality" of the labor force and the "health" of higher education.

- d. Items on School Completion and Dropouts (See Items LASTGD, YRATT, YRDEG, YRDIP, GED(1- 3), S56, and S57 on Attachment A)

Labor force participation data for all students, by current enrollment status, and for dropouts and graduates provide necessary measures of economic well-being. This supplement provides the only annual data on enrollment status or date of school completion and labor force status by personal and family characteristics. It also provides general-purpose enrollment data for the entire population and is used extensively by the Office of Planning and Budget of the Department of Education.

The estimate of high school dropout rates and characteristics obtained from this survey will enable the NCES to comply with its legislative mandate to collect and report information on the condition of education in the United States.

3. Use of Information Technology

Since January 1994, we have collected the CPS data using computer-assisted interviewing. We designed the supplemental questions to obtain the required information with minimal respondent burden. The proposed items and interviewer procedures have been developed over years of consultation among the Census Bureau, the BLS, and other government agencies. The use of computer-assisted personal and telephone interviewing is deemed the most appropriate collection methodology, given existing available information technology.

4. Efforts to Identify Duplication

The basic school enrollment questions have been collected annually in the CPS for 50 years. The Census Bureau has consulted with other government agencies, such as the Department of Education, the NCES, and the BLS, and has determined that the CPS October supplement is the only source of historical data – at the national level – on school enrollment by demographic characteristics. Government agencies and private firms have relied upon this series for 50 years as the main source of national school enrollment data.

A number of questions in this supplement may appear in the American Community Survey and in other demographic surveys. However, this supplement's comprehensive set of questions:

- does not duplicate any other single information collection, and
- ensures the historical continuity of a data series that spans over 4 decades.

The CPS October supplement is a yearly source of annual data on enrollment in all schools by demographic, social, and economic characteristics. There are no comparable data that can be replicated, substituted, or modified for use as described in Item 2 above. Even though other surveys, such as the Survey of Income and Program Participation (SIPP), do ask some education questions on a regular basis, they do not collect the same set of information across all age groups that the CPS does.

This supplement to the CPS is the historical source of annual enrollment data for children 3 through 14 years old, which includes children in preprimary and elementary school. Progress in school (modal grade) by student and family characteristics, such as ethnicity, was used in evaluation of trends toward equality in schooling. It is the only source of data on enrollment in public and private schools in which characteristics of the students and their families are also available. The CPS has provided important data for the debate over federal support for private education in terms of the population affected and cost to the government.

Other surveys obtain, or will obtain, data on subpopulations of the CPS sample. Except for the ACS, these surveys often use smaller samples.

- a. The SIPP includes school enrollment items for people 15 years old and over in the core items. It includes items on enrollment in high school, college, or vocational school; year of enrollment; full-time status; and financial aid. The SIPP only includes a small portion of the items that are in the CPS. It does not obtain detail on college and vocational enrollment but does include questions on financial aid that may be used in combination with detailed household income data, not available in the CPS October 2009 Supplement.

- b. The Integrated Postsecondary Education Data System Survey of the Department of Education provides administrative data on numbers of students for the universe of postsecondary schools (biennially by race and age). This data source does not provide any social or economic data on students or any data for comparison with nonstudents.
- c. The Schools and Staffing Survey, conducted by the Census Bureau for the NCES, provides data on school districts, school administrators, and school teachers in public, private elementary, and secondary schools across the country. This survey has little or no overlap with the CPS.

Each of the above surveys includes a portion of the CPS data for different populations at different times. Analysts cannot aggregate the data from these surveys to get a complete enrollment picture at a common point in time. Definitions are not consistent, and the amount of detail varies. The CPS provides comparable measures of enrollment in all levels of school so that analysts can trace year-to-year progression in school.

We can collect preprimary enrollment data only in a large household survey, since the eligible population is small and a large sample is necessary to obtain reasonable data. Also, most preprimary schools are not part of regular public school systems and do not provide administrative data. This is one of the changing areas of education, as the proportion of children involved in preprimary education has risen in the past two decades and as some full-day preprimary enrollment has become enmeshed in the issue of day care for children of working mothers.

Analysts can calculate high school dropout rates by grade, gender, and race from the CPS, as well as enrollment and employment status of recent high school graduates. Although the SIPP can provide similar data, the sample is significantly smaller. Comparisons of race groups or grades, which are of concern on the federal and local levels, may be impossible. The Department of Education uses the CPS data as a critical component of their congressionally-mandated annual study "Dropout Rates in the United States."

Analysts widely use enrollment data for adults from the CPS for small population groups. Recently, college enrollment of young high school graduates by race has been widely discussed, as the college enrollment rate of young Black high school graduates has not increased as much as for young Whites. Because of the sample size difference, differences between the estimates by race are more difficult to detect with the SIPP. The changes in enrollment rates of young Blacks could not have been detected in the SIPP the difference would not have been statistically significant. The confidence intervals on education data in the SIPP are about two-thirds larger than similar estimates in the CPS.

Type of school for college students is not available in the SIPP. Although the SIPP will be useful in tracking educational transitions, the sample size of the CPS is crucial in making annual cross-sectional data useful.

Although the SIPP and the CPS have a few enrollment items in common, the surveys do not duplicate each other. The SIPP school enrollment items relate to receipt of certain types of income and participation in government programs by adults. Enrollment data are not the focus of the survey but provide supporting data as do the demographic characteristics of respondents. They elaborate on the economic status of the population as related to the focus of the survey. The SIPP does not provide the depth of data necessary for analysis of enrollment in postsecondary school. It provides limited information on secondary school and nothing on elementary school.

5. Efforts to Minimize Burden on Small Business

The collection of school enrollment information does not involve small businesses or other small entities.

We designed the supplemental questions to obtain the required information with minimal respondent burden. The proposed items and interviewer procedures have been developed over the years, as a result of consultation between the Census Bureau, the BLS, and other government agencies. Further, there are no legal issues that influence respondent burden.

6. Consequences of Less Frequent Collection

We must collect the school enrollment data annually in order to track trends in enrollment at all levels. Shifts in trends affect educational institutions and the bodies governing them in several areas; such as, government expenditures, employment patterns of youth, and labor force demands within the teaching profession. Planning for areas such as these requires accurate and current data. These data are part of the Department of Education's Annual Report to Congress on the Condition of Education.

7. Consistency with Office of Management and Budget (OMB) Guidelines

These data will be collected in a manner consistent with the OMB guidelines.

8. Consultations Outside the Agency

Over the past year, we have consulted the following people concerning the development of the supplement:

Chris Chapman	Sharon Cohany
National Center for Education Statistics	Bureau of Labor Statistics
202-502-7414	202-691-6341

The result of these consultations is the final set of questions. In addition, a statement soliciting comments for improving the CPS data is prominently placed in all the Census Bureau publications that cite the CPS data. We include a similar statement in the technical documentation that accompanies the microdata files. Finally, we published a notice of our intent to ask the school enrollment questions in the March 26, 2009 edition of the Federal Register (see Vol. 74 pg 13177-13178). We received one comment, which we deemed irrelevant to the collection. The CPS advance letter (see Attachment B) provides respondents with an address at the Census Bureau to which they can submit general comments on the survey and specifically those comments regarding respondent burden.

9. Paying Respondents

The Census Bureau does not make any payments or provide any gifts to individuals participating in the CPS.

10. Assurance of Confidentiality

The Census Bureau will collect the supplement data in compliance with the Privacy Act of 1974 and the OMB Circular A-130. Each sample household receives an advance letter approximately one week before the start of the CPS initial interview (see Attachment B). The letter includes the information required by the Privacy Act of 1974, explains the voluntary nature of the survey, and states the estimated time required for participating in the survey. Interviewers must ask if the respondent received the letter and, if not, provide a copy and allow the respondent sufficient time to read the contents. Also, interviewers provide households with the pamphlet, *The U.S. Census Bureau Respects Your Privacy and Keeps Your Personal Information Confidential*, which further states the confidentiality assurances associated with this data collection effort and the Census Bureau's past performance in assuring confidentiality (see Attachment C). All information given by respondents to the Census Bureau employees is held in strict confidence under Title 13, United States Code, Section 9. Each of the Census Bureau employees has taken an oath to that effect and is subject to a jail penalty or substantial fine if he/she discloses any information given to him/her.

11. Justification for Sensitive Questions

The CPS October supplement does not include any questions of a sensitive nature.

12. Respondent Burden

There will be approximately 55,000 households interviewed with one respondent per household. Each interview takes approximately three minutes; therefore, the total estimated respondent burden for the CPS October 2009 supplement is 2,750 hours for fiscal year 2009. We base these estimates on previously conducted October supplements. The actual interview time is dependent upon the size of the household and the educational characteristics of the household members.

13. Other Costs to Respondents

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

14. Cost to Federal Government

The estimated cost to the government for the CPS program is \$77 million in fiscal year 2009. The costs are to be borne by the Census Bureau, the BLS, and other government agencies, if involved. The basic annual school enrollment questions asked of people aged three years old and older are an annual feature of the CPS program and are included in the basic program funding. We estimate the cost of asking the school enrollment questions to be \$60,000. The NCES will cover this cost.

15. Reason for Change in Burden

There is no change in burden since 2005 of 2,750 hours.

16. Time Schedule, Analysis, and Publication Date

We will conduct the CPS, of which this supplement is a part, during the week of October 18-24, 2009. We expect to produce the basic school enrollment tabulations by March 2010. We plan to publish a final report by October 2010.

17. Displaying the OMB Expiration Date

The October School Enrollment Supplement is administered as part of the CPS monthly interview. However, the supplement (as well as all the CPS supplements) bears the OMB control number and expiration date, which is different from the basic CPS interview. The OMB control number and expiration date for the CPS basic interview is included in the advance letter we give respondents (see Attachment B). Because of these difficulties and anticipated respondent confusion involved with expressing a separate control number and expiration date to respondents for the

supplement questions, we do not wish to display the OMB control number and expiration date for the CPS October supplement.

18. Exceptions to the Certification

There are no exceptions to the certification.