

## SUPPORTING STATEMENT

### DoDEA School Accreditation Parent and Student Surveys

#### A. JUSTIFICATION

##### 1. Need for Information Collection.

The Department of Defense Education Activity (DoDEA) is a DoD field activity operating under the direction, authority, and control of the Deputy Under Secretary of Defense, Military Community and Family Policy. DoDEA provides education to eligible Department of Defense military and civilian dependents from preschool through grade 12 at sites in the United States, Guam, Puerto Rico, and overseas. During the 2008-2009 school year the Department of Defense Education Activity serves an estimated 83,000 students in 192 schools.

DoDEA regulation 2010.1 requires accreditation of all DoDEA schools in order to provide the activity, the military community, and the public at large with an external review of the quality of the educational programs provided to DoDEA students. DoDEA's accreditation process is based on the processes and standards of the North Central Association Commission on Accreditation and School Improvement (NCA CASI)/AdvancED NCA. CASI/AdvancED is the largest accreditation organization in the United States, covering 30 states and 65 countries. As part of the accreditation process, NCA CASI/AdvancED conducts Quality Assurance Review (QAR) visits to DoDEA schools on a yearly rotating schedule that ensures that each school is evaluated within a 5-year cycle. The visits are two days in length in order to gather data, information, and evidence to accomplish the following: Vision and Purpose, Governance and Leadership, Teaching and Learning, Documenting and Using Results, Resources and Support Systems, Stakeholder Communications and Relationships, and Commitment to Continuous Improvement.

##### 2. Uses of the Information.

The Quality Assurance Review team's interview process includes students and parents/guardians. The purpose of the interview session is to help the team gain a deeper understanding of the school improvement process at the school. The review team uses the information to review how well each school is progressing and adhering to the AdvancED standards, provide commendations on areas in which each school is excelling, and recommendations that will help each school continuously improve. The review team also uses the information gathered to make an accreditation status recommendation at the end of the visit.

3. Improved Information Technology.

The interviews will be face-to-face and team members will use computers to collect and synthesize information. Final reports are also distributed electronically. The agency disclosure notice and Privacy Act Statement will be read to participants prior to commencing the interviews.

4. Efforts to Identify Duplication.

DoDEA and NCA CASI/AdvancED do not have current existing data to meet this need.

5. Methods Used to Minimize Burden on Small Entities.

The collection of this information does not involve small businesses.

6. Consequences of Not Collecting the Information.

If the information cannot be collected, DoDEA would lack critical data that are necessary to fulfill the requirements of 2010.1 and to obtain external accreditation. Additionally, without this information, DoDEA would lack critical data that are need to determine the adherence of each school to the school improvement standards, which could impede data-based decision making in regard to programs and academic services offered to DoDEA's students.

7. There are no special circumstances. This collection will be conducted in a manner consistent with the requirements of 5 CFR 1320.5(d)(2).

8. Agency 60-Day Federal Register Notice and Consultations Outside the Agency.

The 60-day Federal Register Notice announcing this information collection (as required by 5 CFR 1320.5(d)) was published on September 15, 2008.

No comments were received in response to this collection notice.

The following individuals have reviewed this information collection:

Defense Manpower Data Center (DMDC)  
Timothy W. Elig  
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Francine R. Jones, CIP  
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9. Payments to Respondents.

The respondents will not receive any monetary payments or gifts associated with participation in this data collection.

10. Assurance of Confidentiality.

This information collection does not ask the respondent to submit proprietary, trade secret, or confidential information to the Department.

**Privacy Act:**

**Authority:** 10 USC Sections 136, 1782, and Executive Order 9397.

**Principal Purposes(s):** The DoDEA School Accreditation Parent and Student Surveys permits input from sponsors and students about the current state of educational quality in our institutions. DoDEA's goal is to improve the capabilities and performance and your responses will contribute to this.

**Routine Use(s):** None.

**Disclosure:** Voluntary; however maximum participation is encouraged in order to gauge education program success and to learn of areas in which DoDEA may improve the quality of educational and programmatic services.

11. Sensitive Questions.

The DoDEA School Accreditation Parent and Student Surveys do not contain questions that could be considered sensitive. No demographic or otherwise identifying information will be asked of respondents.

12. Estimates of Annual Response Burden and Labor Cost for Hour Burden to the Respondent for Collection of Information.

Respondents are students and parents/guardians of students enrolled in DoDEA schools. The total of annual respondents is estimated to be 1,066 (533 Parents and 534 students), those not covered under Title 10 USC 1782 are approximately 3% (n=32).

**Table 1. Burden Estimates**

<b>Burden Estimates</b>	
<b>Total annual respondents</b>	32
<b>Frequency of response</b>	1
<b>Burden hours per response</b>	.75 (45 min)
<b>Total burden hours</b>	24

B. Explanation of How Burden was Estimated.

The estimated burden hours were calculated using average completion time and response rates of previous interviews applied to the portion of current school year population of students and parents not covered under Title 10 USC 1782. Table 2 illustrates the total of possible respondents by sponsoring agency. Those considered “Members of the Public” and therefore possible respondents to and covered by this collection are presented in the last row denoted as “Non-military/DoD Civilian.” These individuals include individuals sponsored by, but not limited to, the State Department, Private US Business, Contractors, etc.

**Table 2. DoDEA Student and Parent Population Disaggregated by Sponsorship**

	Percent of Population	Parents	Students in Grades 4-12
Army	50%	267	267
Navy	10.4%	55	56
Marine Corps	9.8%	52	52
Air Force	22%	117	117
DoD Civilian	4.8%	26	26
Non-military/DoD	3%	16	16
Total	100%	533	534

The interviews will be conducted in 34 schools annually, with approximately 16 students and parents in each school. As indicated in table 2, approximately 3% of these are covered by this information collection authorization.

**Students:** (34 schools) x (16 students) x (3%) = 16

**Parents:** (34 schools) x (16 parents) x (3%) = 16

**Estimated Total Annual Respondents:** 32

C. Labor Cost to the Respondents.

**Table 3. Estimated Labor Costs to the Respondents (Based on an Average of 45 minutes)**

	Low (students only)*		Medium (1/2 of the sponsors)**		High (1/2 of the sponsors)***		Total	
	N	Cost	N	Cost	N	Cost	N	Cost
Sponsors (PreK-12)			8	\$124.00	8	\$196.32	16	\$320.32
Students (grades 4-12)	16	\$71.84					16	\$71.84
							32	\$392.16

\*\$5.85 per hour (minimum wage); 45 minutes =  $(\$5.85 \times .75) = \$4.49$  per respondent

\*\*\$20.66 per hour; 45 minutes =  $(\$20.66 \times .75) = \$15.50$  per respondent

\*\*\*\$32.72 per hour; 45 minutes =  $(\$32.72 \times .75) = \$24.54$  per respondent

13. Estimates of Other Cost Burden for the Respondent for Collection of Information:

a. Total Capital and Start-up Cost. There are no capital or start-up costs associated with this information collection.

b. Operation and Maintenance Cost. There are no operational or maintenance costs associated with this collection.

14. Annualized Cost to the Federal Government.

Administrative costs to update and administer the DoDEA School Accreditation Surveys.

**Table 4. Estimated Cost to DoDEA to Administer the DoDEA School Accreditation Parent and Student Surveys**

	Projected Hours	Cost Per Hour	Total Cost
TP/Teacher (2)	4 hrs each (8)	39.50	316.00
TP/ Teacher (2)	4 hrs each (8)	42.77	342.16
TP/ Administrator (1)	4 hrs	49.37	197.48
Overall Total Cost: \$855.64			

15. Changes in Burden.

There are no changes in burden as this is a new collection.

16. Publication Plans/Time Schedule.

Scheduled schools are visited for three days during the month of February or during the month of April. Sections of the final report (Quality Assurance Review Report) are verbally reported to the total school community which includes, but is not be limited to teachers, administrators, students, staff, District level staff, parents, community members, military command, and military members at the end of the three day visit. The complete

written report, after being sent through an edit/review process, is sent to the school within six weeks of the visit. The report is available to be read by all stakeholders. Beginning in the 2009-2010 school year, reports for each school will also be made available to the public through the DoDEA and individual school websites.

17. Approval Not to Display Expiration Date.

Approval not to display the expiration date is not being sought.

18. Exceptions to the Certification Statement.

No exemptions/exceptions to the Certification Statement are being sought.

**B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS**

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g. establishments, State and local governmental units, households, or persons) in the universe and the corresponding sample are to be provided in tabular form. The tabulation must also include expected response rates for the collection as a whole. If the collection has been conducted before, provide the actual response rate achieved.

Each of the 191 DoDEA school is on a five year visitation cycle, meaning each school is visited once every five years. This visitation schedule is determined by the accrediting agency and has been in place since the beginning of the NCA/CASI, now AdvancED, Accreditation contract. There are times when a school's visit is delayed for a year, but that is under the direction of the District Superintendent with agreement of the Area Director and Headquarters approval. New schools are added to the cycle again with the recommendation of the District Superintendent and agreement of the Area Superintendent and Headquarters. Likewise, schools are removed from the list as they are consolidated or close.

The universe of student and parent respondents is determined on an individual school basis, and is therefore comprised of those students enrolled at the time of the accreditation visits, conducted in the spring of each year. This number varies significantly by school, with student enrollments ranging from approximately 30 to 1000 (Table 5). It should be noted that in most cases the potential respondent universe for parents is slightly less than that for students; as only one parent per individual household participates. Parent participation is also affected by English Language and deployment status of parents.

**Table 5. Total Student Enrollment by School**

	Number
AFNORTH Elementary/High School	541
Albritton Junior High School	648
Alconbury Elementary School	233
Alconbury High School	230
Amelia Earhart Intermediate School	535
Andersen Elementary School	1004
Andersen Middle School	319
Andre Lucas Elementary School	564
Ankara Elementary/High School	241
Ansbach Elementary School	247
Ansbach High School	393
Antilles Elementary School	765
Antilles High School	444
Antilles Middle School	564
Ashurst Elementary School	238
Aukamm Elementary School	177
Aviano Elementary School	777
Aviano Middle/High School	562
Bahrain Elementary/High School	453
Bamberg Elementary School	617
Bamberg High School	408
Barkley Elementary School	699
Baumholder High School	381
Bechtel Elementary School	758
Bitburg Elementary School	292
Bitburg High School	257
Bitburg Middle School	149
Bitz Intermediate School	484
Bob Hope Primary School	645
Boeblingen Elementary/Middle School	564
Bowley Elementary School	437
Brewster Middle School	538
Brittin Elementary School	739

To select parents, the school sends an individual family invitation to a representative group via electronic and/or print method. The interview session is also posted throughout the school community in order to provide those parents not invited with an opportunity to participate. The number of parents submitted for clearance represents the approximate average of invited parents and parents who volunteer through public recruitment.

There are two methodologies used to select students to participate in the student interviews with the QAR team. One method includes selection of the students by the school. Schools are instructed to select students that are representative of the school in terms of demographics (race, gender, grade level) and achievement. The other method includes selection by the QAR team. Team members are assigned slips to distribute based on a specific demographic group (race, gender, special education and English Language status). Prior to each school visit, the QAR team receives a profile of the school, to include number and percentages of students by grade level, race/ethnicity, and gender. Using this profile as a guide, the QAR Chair ensures that a representative sample of students is included according to grade levels, ethnicity, and gender. Invitations are divided among the QAR team and assignments are made accordingly. Approximately a month prior to the interview session the Accreditation Team Chairs contact the school to advise the school which method will be employed for the student interview session.

Invitations are provided to all parents to attend the parent interviews, and the interviews are usually set to accommodate their schedules. There is always the probability that some of the interviewees (i.e. students and parents) are related, but that is not a determining factor when inviting parents or students to participate in the interview session.

The number of respondents per group depends on the age level of the group and the size of the school. With lower elementary students (K – 3) the group sizes are kept between 5 and 6 students. For upper elementary, middle, and high school the number in each group can range from 6 to 8. The parents are divided into equal groups with one or two Accreditation Team member per group. The Accreditation Team will divide the large group into small groups to make sure all interviewees have the opportunity to express their opinion and to ensure that all questions for the 7 Accreditation Standards are answered. The questions are randomly divided equally between the numbers of small groups.

2. Describe the procedures for the collection, including: the statistical methodology for stratification and sample selection; the estimation procedure; the degree of accuracy needed for the purpose described in the justification; any unusual problems requiring specialized sampling procedures; and any use of periodic (less frequent than annual) data collection cycles to reduce burden.

Responses are collected by team members using a laptop computer and standard word processing software. Stratification of sample selection is based on representative



proportions – the interview groups are intended to match the overall school demographics as closely as possible. Due to the established visitation cycle, less frequent or altered collection cycles is not employed.

3. Describe the methods used to maximize response rates and to deal with nonresponse. The accuracy and reliability of the information collected must be shown to be adequate for the intended uses. For collections based on sampling, a special justification must be provided if they will not yield "reliable" data that can be generalized to the universe studied.

As the data are collected face to face, two issues of non-response are addressed. The first is non-response for participation. Prior history indicates that non-participation of this type is not a factor; almost all potential respondents agree to participate. The second type of non-response that must be addressed is non-response within group. All team members are trained in appropriate techniques to encourage equal participation, such as question rephrasing and direct questioning.

4. Describe any tests of procedures or methods to be undertaken. Tests are encouraged as effective means to refine collections, but if ten or more test respondents are involved OMB must give prior approval.

The North Central Association Commission on Accreditation and School Improvement (NCA CASI), a division of AdvancED, accredits schools using a qualitative process through on-site visits referred to as Quality Assurance Review (QAR) visits. The QAR teams engage in an extensive process of data gathering through three primary means: review of artifacts (documents), conducting interviews with stakeholders, and conducting classroom observations. Review of artifacts/documents provides evidence of school planning, systematic processes that support effective teaching and learning, and that results are being achieved. Interviews and classroom observations are conducted to ensure implementation is occurring.

As the data collected through this submission are qualitative, the answers to the interview questions are constructed responses not selected from answer alternatives. Responses are analyzed by question, as opposed to by theme, in adherence with standard qualitative practices. Throughout the interviews, the QAR team listens for patterns, themes, and trends that are consistent between various stakeholders. The QAR team listens for evidence that school initiatives and plans are being implemented. The first task is to separate all the individual answers from each question into related groups. The next task would be to weigh the answers. For example if you had ten answers to a particular question and five of the answers were similar that answer would receive a higher weight than two similar answers. Evaluative words are then assigned to the weighted answers. For example if an answer was highly rated the descriptive word could be many, strong, or excellent. Each interview question is within a standard and therefore the combined interview answers are used as evidence to support the practices of the school in each of the standard areas. The weighted statements are added to the body of the Quality Assurance

Review Report either in the “Description”, “Strengths”, or “Suggestion and Opportunities for Improvement” for each Standard.

In addition to the interviews, the team also conducts classroom observations, which are used to validate that espoused claims are true, discover evidence that might not be made available through other sources, and corroborate information obtained from interviews and artifacts. Combining all data sources, the QAR teams determine the evidence based on multiple sources of information that reinforce each other and allow for a professional judgment to be made that the school is meeting the AdvancED standards for accreditation. All information is combined and an overall assessment rubric is applied for each of the seven accreditation standards. The evidence is thoroughly reviewed in context of the rubric, standard by standard, and a performance level is given to each standard which includes Not Evident (1), Emerging (2), Operational (3), or High Functional (4). A passing score is a score of 3 or 4.

Once all the standards have been reviewed and rated, the team makes an accreditation status recommendation based on the following accreditation policy:

Accredited - All standards rated at or above Operational

Accredited on Advisement - One or more standards rated Emerging

Accredited Warned - One standard rated Not Evident

Accredited Probation - Two standards rated Not Evident

Deny or Drop - Three or more standards rated Not Evident

5. Provide the name and telephone number of individuals consulted on the statistical aspects of the design, and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

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