

**MEMORANDUM****OMB # 1850-0803 v.23**

DATE: March 5, 2010

TO: Shelly Martinez  
Office of Information and Regulatory Affairs, Office of Management and Budget

FROM: Kashka Kubzdela  
National Center for Education Statistics

SUBJECT: System Clearance for Cognitive, Pilot, and Field Test Studies Burden Change Request

This change request is to increase the number of responses and burden hours allowed under the generic clearance for the National Center for Education Statistics (NCES) to conduct various tests of questionnaires and survey procedures, especially to test new questions, forms, or other methodologies. These procedures include but are not limited to experiments with levels of incentives for various types of survey operations, focus groups, cognitive laboratory activities, pilot testing, experiments with questionnaire design, and usability testing of electronic data collection instruments.

The system clearance for NCES Cognitive, Pilot, and Field Test Studies was approved on September 26, 2007 (OMB# 1850-0803 v.8), with a burden change approved on July 23, 2008 (OMB# 1850-0803 v.13) allowing for a total of 3,540 responses and 4,442 burden hours per year.

There are two primary reasons for our request to increase burden:

The first reason is that in previous clearances we were not including screeners and other recruitment activities in the studies' burden calculations. Based on recent OMB's guidance, we have begun doing so in the list two cognitive study generic clearances (Certifications cog labs – OMB# 1850-0803 v.21 and NHES cognitive interviews OMB# 1850-0803 v.22). In both cases, the inclusion of the screeners in the burden calculations increased the number of responses 12 times as what it would have been without including the screener, and the number of burden hours increased 1.5 to 2.2 times. Based on these examples, we can estimate that submitting studies at the previously approved burden level would translate into 42,480 number of responses (3,540\*12) and 8,884 burden hours (4,442\*2).

The second reason is that due to OMBs' guidance we received at the end of September 2009 as part of the terms of clearance for a PEQIS study (OMB# 1850-0733 v.21) and in December 2009 as part of an OMB workshop at NCES, we anticipate a significant increase in cognitive laboratory study clearances the Center will request of OMB. The exact impact of that increase on the annual number of responses and burden hours the Center will need to conduct such studies is hard to predict at this early stage. As a result, at this time we propose no more than a modest rounding up of the annual burden estimated above, namely to 45,000 number of responses and 9,000 burden hours per year.

We therefore respectfully request an increase in burden hours to 9,000 per year, and in the number of responses to 45,000 per year.