



**School Survey on Crime and Safety (SSOCS)
2010 and 2012**

OMB Supporting Statement A

September 25, 2009

Contents

| | |
|--|----------|
| Section A. Justification..... | 4 |
| A.1. CIRCUMSTANCES MAKING COLLECTION OF INFORMATION NECESSARY | 4 |
| A.2. PURPOSES AND USES OF INFORMATION | 9 |
| A.3. APPROPRIATE USE OF INFORMATION TECHNOLOGY | 10 |
| A.4. EFFORTS TO IDENTIFY DUPLICATION | 10 |
| A.5. METHODS USED TO MINIMIZE BURDEN ON SMALL ENTITIES | 11 |
| A.6. FREQUENCY OF DATA COLLECTION | 11 |
| A.7. SPECIAL CIRCUMSTANCES OF DATA COLLECTION | 11 |
| A.8. CONSULTANTS OUTSIDE THE AGENCY | 12 |
| A.9. PROVISION OF PAYMENTS OR GIFTS TO RESPONDENTS | 13 |
| A.10. ASSURANCE OF INDIVIDUALLY IDENTIFIABLE DATA PROTECTION FROM DISCLOSURE | 13 |
| A.11. SENSITIVE QUESTIONS | 15 |
| A.12. ESTIMATES OF HOUR BURDEN FOR INFORMATION COLLECTION | 15 |
| A.13. ESTIMATES OF COST BURDEN TO RESPONDENTS OR RECORD KEEPERS RESULTING FROM THE COLLECTION OF INFORMATION | 16 |
| A.14. ESTIMATES OF ANNUAL GOVERNMENT COST | 16 |
| A.15. REASONS FOR CHANGES IN RESPONSE BURDEN AND COSTS | 17 |
| A.16. TIME SCHEDULE | 17 |
| A.17. APPROVAL TO NOT DISPLAY EXPIRATION DATE FOR OMB APPROVAL | 20 |
| A.18. Exceptions to the Certification | 20 |

List of tables

| Table | | Page |
|--------------|---|-------------|
| Table 1A | Schedule of major project activities: SSOCS:2010..... | 17 |
| Table 1B | Schedule of major project activities: SSOCS:2012..... | 17 |

Section A. Justification

The materials in this document are in support of a request for clearance to conduct the 2010 and 2012 implementations of the School Survey on Crime and Safety (SSOCS). The SSOCS survey was conducted in 2000, 2004, 2006, and 2008 (OMB number 1850-0761). Four years separated the first two collections of SSOCS to allow for sufficient time to study the results of the first survey and to allow for necessary re-design work. Plans now call for the SSOCS to be conducted on a biennial basis.

The SSOCS survey is a survey of approximately 3,500 public schools on the topic of school crime and violence. It is a mail survey with telephone and email follow-up and is designed to produce nationally representative data on public schools. Respondents are school principals.

The survey is funded by the Department of Education's Office of Safe and Drug-Free Schools. However, responsibility for the design and conduct of the survey rests with the National Center for Education Statistics (NCES). While two different contractors were used to design and conduct the 2000 and 2004 collections, the 2006 and 2008 collections were done by the Census Bureau through an interagency agreement with NCES. NCES has entered into an interagency agreement with the Census Bureau to conduct the 2010 collection of SSOCS. If this interagency agreement continues to go well, the Census Bureau will also provide data collection services for the 2012 SSOCS. The Census Bureau was the data collection agency for both the 2006 and 2008 SSOCS collections. Westat, Inc., and Abt Associates, Inc., did the earlier collections in 2000 and 2004, respectively.

A.1. Circumstances Making Collection of Information Necessary

SSOCS is the only recurring federal survey collecting detailed information on the incidence, frequency, seriousness, and nature of violence affecting students and school personnel, as well as other indices of school safety from the schools' perspective. As such, it fills an important gap in data collected by NCES and other agencies. It collects information on:

- Frequency and types of crimes at schools, including homicide; rape; sexual battery; physical attacks with or without weapons; threats of attack with or without weapons; robbery with or without weapons; theft; possession of weapons; distribution, possession, or use of illegal drugs or alcohol; and vandalism;
- Frequency and types of disciplinary actions such as removals with no continuing services; transfers to specialized schools; and suspensions for selected offenses;
- Perceptions of other disciplinary problems such as student racial or ethnic tensions; bullying; verbal abuse; disorder in the classroom; gang activities; and cult or extremist group activities;
- Description of school policies and programs concerning crime and safety;
- Description of student, parent, and teacher involvement in efforts intended to prevent or reduce school violence; and
- School characteristics associated with school crime.

The predecessor to SSOCS was a survey done through NCES' Fast Response Survey System in 1996–97. At the time these data were being released in 1997–98, a number of tragic shootings

occurred at schools across the county. Those events took place at Pearl, MS; West Paducah, KY; Jonesboro, AR; and Columbine, CO. When it came to light that neither the Departments of Justice nor Education had a recurring survey by which to measure the frequency of crime and violence at schools, the Department of Education made a commitment to begin such a survey on a regular basis. Thus, planning for the SSOCS began.

The original SSOCS questionnaire (2000) was developed in consultation with a Technical Review Panel (TRP) consisting of some of the nation's top experts on school crime and school programs relating to crime and safety. Revisions for the 2004 questionnaire were based on data received from the SSOCS 2000, a review of current literature in the field, feedback from a TRP and related government agencies, as well as the results of extensive pre-testing conducted by Abt Associates. The questionnaires used in the 2006 and 2008 collections were essentially the same as that used in 2004. NCES has recently been in contact with several SSOCS data users and other experts in the field of school crime and safety to determine the need for revisions in SSOCS 2010. The questionnaire planned for use in 2010 and 2012 is essentially the same as that used in 2008, with a few exceptions, detailed in supporting statement C, Appendix C. As such, SSOCS 2010 will continue to provide a valuable tool to policymakers and researchers who need to know what the level of crime is and how it is changing, what disciplinary actions schools are taking, and what policies and programs related to school crime and violence schools have in place.

Legislative Authorization

The National Center for Education Statistics (NCES) of the Institute of Education Sciences (IES), U.S. Department of Education, is conducting this study, as authorized under Public Law 107-279, Title I, Part C, Section 151(b) and 153(a) of the *Education Sciences Reform Act of 2002* and U.S. Code Title 20 Section 9543 which states:

“The Statistics Center shall collect, report, analyze, and disseminate statistical data related to education in the United States and in other nations, including -

(1) collecting, acquiring, compiling (where appropriate, on a State-by-State basis), and disseminating full and complete statistics (disaggregated by the population characteristics described in paragraph (3)) on the condition and progress of education, at the preschool, elementary, secondary, postsecondary and adult levels in the United States, including data on -

- (A) State and local education reform activities;
- (B) State and local early childhood school readiness activities;
- (C) student achievement in, at a minimum, the core academic areas of reading, mathematics, and science at all levels of education;
- (D) secondary school completions, dropouts, and adult literacy and reading skills;
- (E) access to, and opportunity for, postsecondary education, including data on financial aid to postsecondary students;
- (F) teaching, including---
 - (i) data on in-service professional development, including a comparison of courses taken in the core academic areas of reading, mathematics, and science with courses in noncore academic areas, including technology courses; and
 - (ii) the percentage of teachers who are highly qualified (as such term is defined in section 9101 of the Elementary and Secondary Education Act of 1965 (20 U.S.C.

7801)) in each State and, where feasible, in each local educational agency and school;

(G) instruction, the conditions of the education workplace, and the supply of, and demand for, teachers;

(H) **the incidence, frequency, seriousness, and nature of violence affecting students, school personnel, and other individuals participating in school activities, as well as other indices of school safety, including information regarding ---
the relationship between victims and perpetrators;
(ii) the type of weapons used in incidents, as classified in the Uniform Crime Reports of the Federal Bureau of Investigation;**

(I) the financing and management of education, including data on revenues and expenditures;

(J) the social and economic status of children;

(K) the existence and use of educational technology and access to the Internet by students and teachers in elementary and secondary schools;

(L) access to, and opportunity for, early childhood education;

(M) the availability of, and access to, before-school and after-school programs (including such programs during school recesses);

(N) student participation in and completion of secondary and postsecondary vocational and technical education programs by specific program areas; and

(O) the existence and use of school libraries;

(2) conducting and publishing reports and analyses of the meaning and significance of the statistics described in paragraph (1);

(3) collecting, analyzing, cross-tabulating, and reporting, to the extent feasible, information by gender, race, ethnicity, socioeconomic status, limited English proficiency, mobility, disability, urban, rural, suburban districts, and other population characteristics when such disaggregated information will facilitate educational and policy decisionmaking;

(4) assisting public and private educational agencies, organizations, and institutions in improving and automating statistical and data collection activities, which may include assisting State educational agencies and local educational agencies with the disaggregation of data and with the development of longitudinal student data systems;

(5) determining voluntary standards and guidelines to assist State educational agencies in developing statewide longitudinal data systems that link individual student data consistent with the requirements of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 6301 et seq.), promote linkages across States, and protect student privacy consistent with section 183, to improve student academic achievement and close achievement gaps;

(6) acquiring and disseminating data on educational activities and student achievement (such as the Third International Math and Science Study) in the United States compared with foreign nations;

(7) conducting longitudinal studies, **as well as regular and special surveys and data collections, necessary to report on the condition and progress of education;**

(8) assisting the Director in the preparation of a biennial report, as described in section 119; and

(9) determining, in consultation with the National Research Council of the National Academies, methodology by which States may accurately measure graduation rates (defined as the percentage of students who graduate from secondary school with a regular diploma in the standard number of years), school completion and dropout rates.”

United States Code 20 USC 7131 - Sec. 7131 also calls for research on school crime and safety within the Department of Education as part of its decision to disseminate funds in the interest of drug of violence prevention. This section also encourages the sharing of such information among Federal partners. Specifically:

“(a) Program authorized From funds made available to carry out this subpart under section 7103(2) of this title, the Secretary, in consultation with the Secretary of Health and Human Services, the Director of the Office of National Drug Control Policy, and the Attorney General, shall carry out programs to prevent the illegal use of drugs and violence among, and promote safety and discipline for students.

The Secretary shall carry out such programs directly, or through grants, contracts, or cooperative agreements with public and private entities and individuals, or through agreements with other Federal agencies, and shall coordinate such programs with other appropriate Federal activities.

Such programs may include - (1) the development and demonstration of innovative strategies for the training of school personnel, parents, and members of the community for drug and violence prevention activities based on State and local needs; (2) the development, demonstration, scientifically based evaluation, and dissemination of innovative and high quality drug and violence prevention programs and activities, based on State and local needs, which may include - (A) alternative education models, either established within a school or separate and apart from an existing school, that are designed to promote drug and violence prevention, reduce disruptive behavior, reduce the need for repeat suspensions and expulsions, enable students to meet challenging State academic standards, and enable students to return to the regular classroom as soon as possible; (B) community service and service-learning projects, designed to rebuild safe and healthy neighborhoods and increase students' sense of individual responsibility; (C) video-based projects developed by noncommercial telecommunications entities that provide young people with models for conflict resolution and responsible decisionmaking; and (D) child abuse education and prevention programs for elementary and secondary students; (3) the provision of information on drug abuse education and prevention to the Secretary of Health and Human Services for dissemination; **(4) the provision of information on violence prevention and education and school safety to the Department of Justice for dissemination;** (5) technical assistance to chief executive officers, State agencies, local educational agencies, and other recipients of funding under this part to build capacity to develop and implement high-quality, effective drug and violence prevention programs consistent with the principles of effectiveness in section 7115(a) of this title; (6) assistance to school systems that have particularly severe drug and violence problems, including hiring drug prevention and school safety coordinators, or assistance to support appropriate response efforts to crisis situations; (7) the development of education and training programs, curricula, instructional materials, and professional training and development for preventing and reducing the incidence of crimes and conflicts motivated by hate in localities most directly affected by hate crimes; (8) activities in communities designated as empowerment zones or enterprise communities that will connect schools to community-wide efforts to reduce drug and violence problems; and

(9) other activities in accordance with the purpose of this part, based on State and local needs. (b) Peer review The Secretary shall use a peer review process in reviewing applications for funds under this section.”

In addition, Congress reauthorized the Safe and Drug-Free Schools and Communities Act of 1994 in the year 2002 to support drug and violence prevention programs, including an impact evaluation component and a provision for NCES to collect data on the frequency, seriousness, and incidence of violence in elementary and secondary schools. SSOCS will address both of these actions of Congress by providing statistics on the frequency of violence, the nature of the school environment, and the characteristics of school violence prevention programs.

The Center assures participating individuals and institutions that any data collected under the 2009–10 SSOCS survey shall be in total conformity with NCES’ standards for protecting the privacy of individuals.

A plan for protecting individual data from disclosure has been developed by NCES and the Census Bureau. Under this plan, the SSOCS:2010 will conform to federal legislation and guidelines – specifically, Section 183 of the *Education Sciences Reform Act of 2002 (ESRA 2002)* Public Law 107-279, Section 183, the *Privacy Act of 1974* (5 U.S.C. 552a), *Privacy Act Regulations* (34 CFR Part 5b), Sections 444 and 445 of the *General Education Provisions Act* (20 U.S.C. 1232g, 1232h), the *Federal Information Security Management Act of 2002* and the *NCES Statistical Standards and Policies* handbook. From the initial contact with the participants in this survey through all of the follow-up efforts, careful attention will be paid to informing potential survey respondents that NCES and Census will protect their personal data from disclosure to the fullest extent allowable under law. The Census Bureau will collect the data for NCES by the authority of Public Law 107-279, Title I, Part E, Section 183 of the *Education Sciences Reform Act of 2002* (20 USC 9573), which guarantees the protection of respondents’ data from disclosure in identifiable form, except as required by law.

All survey respondents will be informed that this is a voluntary survey in a survey cover letter signed by the Commissioner of NCES. The cover letter will also state that individual respondent or school results will not be identified in any reports.

All information about individual respondents will be used only for statistical purposes and may not be disclosed, or used, in identifiable form for any other purpose except as required by law in compliance with the *Education Sciences Reform Act of 2002 (ESRA 2002)* Public Law 107-279, Section 183 which, except as amended by the Patriot Act of 2001, states that

No person may--

- use any individually identifiable information furnished under this title for any purpose other than a research, statistics, or evaluation purpose;
- make any publication whereby the data furnished by any particular person under this title can be identified; or
- permit anyone other than the individuals authorized by the Director to examine the individual reports.

The penalty for unlawful disclosure is a fine of no more than \$250,000 (under 18 U.S.C. 3571) or imprisonment for not more than five years (under 18 U.S.C. 3559), or both.

The *U.S.A. Patriot Act of 2001*, (Public Law 107-56) permits the Attorney General to petition a court of competent jurisdiction for an *ex parte* order requiring the Secretary of the Department of Education to provide data relevant to an authorized investigation or prosecution of an offense concerning national or international terrorism. The law states that any data obtained by the Attorney General for such purposes “...may be used consistent with such guidelines as the Attorney General, after consultation with the Secretary, shall issue to protect confidentiality.” This law was incorporated into the *Education Sciences Reform Act of 2002*.

A.2. Purposes and Uses of Information

SSOCS has been designed to meet the congressional mandate for NCES to provide statistics on the frequency of violence, the nature of the school environment, and the characteristics of school violence prevention programs. Such national data are critical, given the tendency to focus on anecdotal evidence of crimes without knowing the true frequency of problems in the schools. Without accurate information, policymakers may make misinformed decisions about school policy, and the public might lose confidence in public schools.

Most items in the 2004, 2006, and 2008 surveys will be repeated in the SSOCS 2010 and 2012 surveys, allowing for comparisons between the fourth and fifth data collections. A complete description of changes from the 2008 to 2010 instrument is provided in the questionnaire changes and rationale section in Supporting Statement C, Appendix C. The data will be used by NCES to prepare summary descriptive reports of the findings, and will be made available as restricted-use databases for use by researchers and policy makers on school crime and safety, as well as public-use databases available on the NCES website.

Data from the previous SSOCS surveys have been released annually in NCES’ *Condition of Education* and *Digest of Education Statistics*, as well as in NCES’ annual *Indicators of School Crime and Safety*. Each iteration of SSOCS data have also been released in a “First Look” report, *Violence in the U.S. Public Schools: 1999–2000 School Survey on Crime and Safety*; *Violence in the U.S. Public Schools: Findings From the School Survey on Crime and Safety 2003–04*, and *Violence in the U.S. Public Schools: Findings From the School Survey on Crime and Safety 2005–06*. All of these publications are available on NCES’ website as well as through the Department of Education’s main publication distribution center, EdPubs. Data are also made available in a complete table library containing cross-tabulations of SSOCS variables by various school characteristics on NCES’ website.

The restricted-use data file and codebook for SSOCS 2008 is slated for release in early May 2009, which will be 11 months following the close of data collection for this administration of SSOCS. The “First Look” report containing data from the SSOCS:2008, *Violence in the U.S. Public Schools: Findings From the School Survey on Crime and Safety 2007–08*, is currently under IES review and will also be released in early May 2009. The associated User’s Manual will be released in September 2009. Finally, a more extensive statistical analysis report titled *School Violence and School Practices: Findings From the School Survey on Crime and Safety 2007–08* will be released in December 2009.

A.3. Appropriate Use of Information Technology

This survey will be conducted by mail with telephone and email follow-up. FAX and email might also be used to deliver questionnaires if respondents so request.

Schools will be asked to provide the email addresses of their principals. Those email addresses will be sent reminder emails, as appropriate, in the data collection period. When emails are sent, addresses will be “masked” so that recipients do not have access to the email addresses of other recipients.

An electronic database will be used to track all sampled cases in order to determine where further follow-up is required.

Computer edits will be performed to verify the completeness of the questionnaire and consistency of the data that are collected. For example, computer edits include whether a subset of responses add to the total, whether skip patterns have been followed correctly, whether values fall outside of the range that is typically found for such schools, and whether some responses might be logically inconsistent.

Because of its small sample size (~3,500 public schools), SSOCS will not offer an Internet option in 2010. The possibility of providing such an option in later administrations will be kept open. The survey design team will closely watch other NCES surveys that offer the option and evaluate the pros and cons of such an option for future iterations of SSOCS.

A.4. Efforts to Identify Duplication

The SSOCS was developed in consultation with the:

- Safe and Drug-Free Schools Program (S&DFS);
- Office of Juvenile Justice and Delinquency Prevention (OJJDP);
- Bureau of Justice Statistics (BJS);
- Office of Special Education Services (OSEP);
- National Institute of Justice (NIJ);
- Office of Community Oriented Policing Services (COPS); and
- National experts on the topic of school crime.

When SSOCS was first developed, extant surveys that touch on the topic of school crime and safety were examined to determine where duplication might exist. While there are other federal surveys that collect information from principals about school crime and safety, these surveys (the National Study of Delinquency Prevention in Schools, 2000, and the School Health Policies and Programs, 1999-2000) do not collect the same information as SSOCS. SSOCS provides more extensive coverage of the types of crime and discipline that occur in schools, as well as the efforts that schools use to combat these problems.

Other surveys that collected similar information as SSOCS are not administered repeatedly. For example, the Safe School Study of 1976, and the 1991 and 1996–1997 FRSS Surveys, the

predecessors to SSOCS:2000, collected data from principals on school crime. These surveys, however, were one-time surveys that will not be repeated. SSOCS' regular and repeated administrations allow for analysis of trends in incidences of school crime and its correlates.

Other federal surveys obtain information about school crime from individuals other than the school-level perspective of principals. For example, the School Crime Supplement to the National Crime Victimization Survey, administered in 1989, 1995, 1999, 2001, 2003, 2005, 2007 and 2009, collected data on school crime and safety from students ages 12 to 18. Students also serve as the primary respondents in the Youth Risk Behavior Surveys and the Monitoring the Future Surveys. These surveys do not provide data from the same perspective as SSOCS.

A.5. Methods Used to Minimize Burden on Small Entities

The burden on small schools and districts is minimized during the SSOCS data collection through the sample design. The design specifies the selection of schools as a function of size, which is defined by the number of students. Small schools and districts are sampled at lower rates because they comprise a smaller proportion of the student population per school.

A.6. Frequency of Data Collection

As indicated earlier, the SSOCS is planned as a biennial survey, and this request is for clearance of SSOCS:2010 and SSOCS:2012. Separate requests will be submitted for SSOCS collections in 2014 and beyond. If these data were collected less frequently it would hamper the ability to monitor trends and provide policy makers with timely data on school crime. If the data were not collected at all, NCES would fail to meet its legislatively required mandate to collect and report such data. In addition, legislators, school officials, and constituents would be without timely data on the incidence and frequency of school crime and characteristics of disciplinary actions, programs, and indicators of disorder in U.S. schools.

A.7. Special Circumstances of Data Collection

The 2010 SSOCS questionnaire will be mailed to respondents on February 22, 2010, with instructions to return on or before March 22, 2010. The data collection period, however, will remain open through June 14, 2010. Schools that do not respond by March 22, 2010, will be contacted again and encouraged to complete their questionnaires.

The 2010 SSOCS replicates the data collection procedures utilized in the 2000, 2004, 2006, and 2008 SSOCS. It is required that the survey be completed in less than 30 days and this is for a number of reasons. One reason is the time of year the survey is administered. The time period for the administration of the survey is designed to correspond to the end of the school year, without overlapping with the beginning of summer vacation. In order to achieve a high response rate, it is necessary to reach the principals prior to the end of the school year to guarantee that they can be reached for follow-up calls if necessary. The timing of the survey administration also is designed to avoid overburdening principals at the very end of the school year when they have other administrative responsibilities.

Another reason for allocating less than 30 days for principals to respond is length of the data collection period. The data collection period is less than four months. The survey collects counts of certain events, such as the number of crimes or disciplinary actions, which occur during the school year. In order to collect information on as much of the school year as possible, the data collection period was kept short and as close to a full school year as possible. Because the data collection period is less than four months long, it is necessary to allow enough time for nonresponse follow up. Most of the schools in the earlier SSOCS collections required some form of nonresponse follow up, and this is the expectation for the 2010 survey, as well.

There are no other special circumstances.

A.8. Consultants Outside the Agency

This survey was developed in consultation with a Technical Review Panel (TRP) that was created to review crime-related surveys sponsored by NCES. Panel members and their affiliations are as follows:

- Lynn Addington, Department of Justice, Law and Society, American University
- Bill Bond, National Association of Secondary School Principals
- Margaret Evans, National Association of Elementary School Principals
- Denise Gottfredson, Department of Criminology and Justice, University of Maryland
- Gary Gottfredson, Gottfredson Associates, Inc.
- Kristen Hayes, Office of Safe and Drug Free Schools
- William Lassiter, Center for Prevention of School Violence
- Colin Loftin, School of Criminal Justice, State University of New York, Albany
- Sister Dale McDonald, National Catholic Education Association
- Shannon Means, Kentucky Center for School Safety
- Michael Rand, Bureau of Justice Statistics
- Bill Smith, Instructional Support Services, Sioux Falls School District

In addition, the feedback on the SSOCS:2008 questionnaire to inform revisions to SSOCS:2010 was provided by the following outside experts:

- Lynn Addington, Department of Justice, Law and Society, American University
- Amanda Nickerson, School Psychology, Department, State University of New York, Albany
- Teresa Sarmiento Brooks, School of Social Work, University of New England

Finally, prior to the 2004 SSOCS, nine administrators from schools varying in locale, level, and district were recruited to identify potential issues with wording, formatting, and content. These nine participants responded to a series of scripted questions related to the survey items that tested the clarity of terms, the appropriateness of response options, and overall ease in responding to specific survey questions. Interviews were conducted at the schools and varied in length from 1 to 2 hours. Participants received a \$50 honorarium for their time and feedback.

After the questionnaire was modified based on the results of the cognitive interview, seven site visits were completed to determine how schools record crime data (i.e., the format and layout of

the data) and the amount of time it takes to obtain the appropriate data. As with the cognitive interviews, administrators were recruited from schools varying in locale, level, and district and were asked to complete a shortened version of the questionnaire. Interviews were conducted at the schools and varied in length from 1 to 3 hours. Participants received a \$100 honorarium for their time and feedback.

To test the wording and format of the questionnaire and to find out how long it took for respondents to complete the SSOCS:2004 instrument in its entirety, a total of eight debriefing interviews were completed. Unlike the cognitive interviews and site visits, the respondents were administrators from public schools only. Principals were asked to complete the survey as if they had received the survey request in the mail, recording the total amount of time it took them to complete the survey. Telephone interviewers then contacted these principals and asked about the amount of time it took to complete the questionnaire, who and what information was needed to respond to the items, whether the questions were clear, and the use and clarity of the instrument provided.

Due to the complexity of this task for SSOCS:2004, its associated cost, and the minimal amount of change to the questionnaire since this thorough undertaking, subsequent consultation with principals about SSOCS survey items has focused on cognitive testing specific items that are new to the survey rather than the entire questionnaire. This was done for SSOCS:2006 and 2008, and will be done for all SSOCS administrations in which substantive revisions are limited to specific items.

A.9. Provision of Payments or Gifts to Respondents

We will not provide any cash payment to survey respondents. The school respondent will be provided with a token non-cash gift of a SSOCS promotional pen as part of the effort to encourage participation. Upon completion of data collection and report/data release, we provide a copy of the “First Look” publication to all schools participating in SSOCS.

A.10. Assurance of Individually Identifiable Data Protection from disclosure

A plan for protecting individual data from disclosure has been developed by NCES and the Census Bureau. Under this plan, the SSOCS:2010 will conform to federal legislation and guidelines – specifically, Section 183 of the *Education Sciences Reform Act of 2002 (ESRA 2002)* Public Law 107-279, Section 183, the *Privacy Act of 1974* (5 U.S.C. 552a), *Privacy Act Regulations* (34 CFR Part 5b), Sections 444 and 445 of the *General Education Provisions Act* (20 U.S.C. 1232g, 1232h), the *Federal Information Security Management Act of 2002* and the *NCES Statistical Standards and Policies* handbook. From the initial contact with the participants in this survey through all of the follow-up efforts, careful attention will be paid to informing potential survey respondents that NCES and Census will protect their personal data from disclosure to the fullest extent allowable under law.

All survey respondents will be informed that this is a voluntary survey in a survey cover letter signed by the Commissioner of NCES. The cover letter will also state that individual respondent or school results will not be identified in any reports.

All information about individual respondents will be used only for statistical purposes and may not be disclosed, or used, in identifiable form for any other purpose except as required by law in compliance with the *Education Sciences Reform Act of 2002 (ESRA 2002)* Public Law 107-279, Title I, Part E, Section 183 which, except as amended by the Patriot Act of 2001, states that

No person may--

- use any individually identifiable information furnished under this title for any purpose other than a research, statistics, or evaluation purpose;
- make any publication whereby the data furnished by any particular person under this title can be identified; or
- permit anyone other than the individuals authorized by the Director to examine the individual reports.

The Census Bureau will collect data under an interagency agreement with NCES.

All Census staff members working on the SSOCS project and having access to the data (including monitoring of interviews) are required to sign the NCES Affidavit of Nondisclosure (see Appendix A). Notarized affidavits are kept on file at Census. SSOCS is conducted under Title 15 and is covered under NCES' confidentiality requirements. Questionnaires are returned to NPC and held in a secure warehouse where only Census Bureau employees and escorted visitors are allowed entry. Documents containing personally identifiable information are shredded when they are no longer needed, which occurs at the commencement of each subsequent data collection. SSOCS 2010 personally identifiable information will be shredded when the SSOCS 2012 data collection begins. In addition, Census takes a number of technological safeguards to ensure that computer systems protect Census confidential data (Title 13), beginning when the units are selected for sample. These safeguards include the use of modernized computer systems and programs that are set up to ensure that a respondent's information is protected from unauthorized access.

NCES and ESSI staff members working on the SSOCS project and having access to the data are required to follow the data security procedures outlined in chapter 3 of IES' *Restricted Use Data Licenses Procedures Manual*. Included in these procedures, all staff having access to the data are required to sign an affidavit of nondisclosure. In addition, printed material containing individually identifiable information shall always be secured from unauthorized access (e.g., locked in a secure cabinet when not in use) and subject data on machine-readable media shall always be secured from unauthorized access (e.g., locked in a secure cabinet when not in use, only necessary copies made). Data are to be copied only when necessary for performing the licensed statistical research; protected at the same level as the original confidential data; made available only to those persons authorized to access the subject data; and destroyed upon completion of the purpose for which the copy was created. Only one backup copy is allowed, and must be protected under the same security procedures as the original database. Under these security procedures, the transportation of data is restricted to an individual with a signed Affidavit of Nondisclosure (that is on file at IES); a "bonded courier," who must sign for the sealed package, and who is responsible for the data during transport; or by certified mail (normal for transporting data between the IES and the Licensee).

As part of the IES data security procedures, the data must always be secured from unauthorized access. Computer rooms/areas that process individually identifiable data must be secure during business hours and locked after close of business. When passwords are used, they shall be unique, 6-8 characters in length, contain at least one non-alphanumeric character, and be changed at least every three months. A notification is required either on the computer screen or affixed to the monitor, stating that unauthorized access to licensed individually identifiable information is a violation of federal law and will result in prosecution. Computers with access to restricted data must automatically shutdown, logout, or lockup when 3-5 minutes of inactivity is detected, and when the data user physically leaves the computer, the computer or room should be locked.

As part of the license agreement, Licensees shall not make routine or system backups of restricted-use data except for the one backup copy of the entire restricted-use database. Overwriting of hard disk data is necessary when a computer containing restricted-use data is no longer used for an NCES project (e.g., reallocated to other projects) or when the computer needs to be repaired (e.g., hard disk crashes).

A.11. Sensitive Questions

SSOCS 2010 is a voluntary survey, and no persons are required to respond to the questionnaire. In addition, respondents may decline to answer any questions in the survey. This voluntary aspect of the survey is clearly stated in the introduction and is stressed in interviewer training.

The items in the SSOCS questionnaire collect information about schools rather than about individual people (see Appendix B for a description and justification of the items and Appendix L for the questionnaire). In this sense, the data are not sensitive. Items about the frequency of crime and disciplinary problems at the school could be viewed as sensitive by some respondents because schools may not want to report data associated with unusually high frequencies of problems. The protection of individually identifiable information from disclosure however is stated in a cover letter to participants as well as the fact that the responses are not in any way tied to funding. In general though, the SSOCS questionnaire asks for information that is in the public domain (e.g., schools communicate their policies to their students and parents in a variety of ways), thus the information is not viewed as sensitive in nature.

A.12. Estimates of Hour Burden for Information Collection

The 2008 SSOCS yielded an unweighted response rate of approximately 75 percent. When the responding schools were weighted to account for their original sampling probabilities, the response rate increased to approximately 77 percent.

An item was included in the 2007–08 SSOCS questionnaire that asked respondents, “How long did it take you to complete this form, not counting interruptions?” Based on an analysis of this item, it is estimated that respondents will need approximately 45 minutes (i.e., 0.75 hours), on

average, to respond to the SSOCS survey.¹ Thus, the overall burden for the survey is computed to be:

2,695 respondents @ .75 hours/respondent = 2,022 burden hours

Assuming that the respondents, mostly principals, would earn \$48.00 per hour,² the cost to respondents for the overall burden would be:

2,022 hours @ \$48.00/hour = \$97,056

[NOTE: The total cost to respondents was estimated to be \$77,234 for the 2007–08 SSOCS. The increase in the total estimated cost for the 2009–10 SSOCS is due to the increase in the overall estimate of principal salary between the two years.]

There are no other costs to respondents.

A.13. Estimates of Cost Burden to Respondents or Record Keepers Resulting From the Collection of Information

The SSOCS does not require any record keeping, so there are no record-keeping costs associated with this collection, and no additional costs to respondents beyond those reported for hour burden.

A.14. Estimates of Annual Government Cost

The Census Bureau is doing the SSOCS 2010 data collection and data file development work for \$898,000 over two years, for an annualized average cost of \$449,000. A task in NCES' Education Statistics Services Institute (ESSI) contract with AIR also supports this survey at about \$1,000,000 over two years, for an annualized average cost of \$500,000. Thus, the 2010 SSOCS will cost the government \$1,898,000 over two years, for a total annualized average cost of \$949,000.

A.15. Reasons for Changes in Response Burden and Costs

This is a reinstatement of a previously approved collection (OMB# 1850-0761 v.3) since ED officially discontinued the collection in December 2008.

The expected number of respondents has slightly increased (from 2,550 to 2,695), while the total annual response burden has decreased (from 2,703 to 2,022 hours), and the estimated annual

¹ The number of minutes estimated to complete the SSOCS:2006 was 63.5 minutes. This estimate was based on cognitive testing for SSOCS:2004. To determine the number of minutes estimated to complete the SSOCS:2008, item C0580 on the SSOCS:2006 questionnaire (“how long did it take you to complete this form, not counting interruptions”), was examined and the estimated response burden was 44 minutes.

² Estimate for principal hourly wage was determined by searching for “Principal” salaries at <http://www.salary.com>.

government cost has remained unchanged (\$949,000) for the SSOCS 2010 and 2012 collections as compared to the 2007–08 SSOCS.

A.16. Time Schedule

NCES is committed to releasing the first publication from a collection as soon as possible after the completion of the data collection. The ultimate goal for all NCES collections is to release a restricted-use data file, First Look report, and supplemental data documentation within 12 months of the data collection end date. This is the goal for the SSOCS 2010 and 2012 collections.

| Table 1A: Schedule of major project activities: SSOCS:2010 | |
|---|----------------|
| Task | Date |
| OMB approval | September 2009 |
| Data collection begins | February 2010 |
| Data collection ends | June 2010 |
| Restricted-use data file finalized | February 2011 |
| First Look report through NCES review | March 2011 |
| First Look report released | June 2011 |
| Restricted-use data file released | June 2011 |
| Public-use data file released | September 2011 |
| Data file user's manual released | September 2011 |
| Statistical analysis report through NCES review | December 2011 |
| Web tables through NCES review | December 2011 |
| Statistical analysis report released | March 2012 |
| Web tables released | March 2012 |

| Table 1B: Schedule of major project activities: SSOCS:2012 | |
|---|----------------|
| Task | Date |
| OMB approval | September 2009 |
| Data collection begins | February 2012 |
| Data collection ends | June 2012 |
| Restricted-use data file finalized | February 2013 |
| First Look report through NCES review | March 2013 |
| First Look report released | June 2013 |
| Restricted-use data file released | June 2013 |
| Public-use data file released | September 2013 |
| Data file user's manual released | September 2013 |
| Statistical analysis report through NCES review | December 2013 |
| Web tables through NCES review | December 2013 |
| Statistical analysis report released | March 2014 |
| Web tables released | March 2014 |

Analysis Tasks

1. First Look Report

This First Look report will use data from the 2009–10 SSOCS to examine a range of issues dealing with school crime and safety, such as the frequency of school crime and violence, disciplinary actions, and school practices related to the prevention and reduction of crime and safety. This publication will largely follow the format and analysis techniques used in prior years, examples of which can be found at:

<http://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2007361>

<http://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2007302rev>

2. Data files and related data documentation

All data files (in several statistical formats) and data documentation (codebooks and user’s manuals) are publicly available on NCES’ website. You can locate examples of data products from prior SSOCS administrations at:

http://nces.ed.gov/programs/crime/pss_data.asp

3. Statistical analysis report

An example from a prior SSOCS collection can be found at:

<http://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2004314>

4. SSOCS web tables

Data from each SSOCS administration are tabulated and released in a table library, accessible through the NCES’ website. Examples of tables from prior SSOCS administrations can be located at: http://nces.ed.gov/programs/crime/crime_tables.asp

Generally, analyses of the SSOCS data follows the research questions presented below. Data will be analyzed in accordance with the research questions. A goal of the data analysis is to provide answers to these questions using various analysis techniques, including t-tests and crosstabs.

Research Questions

The SSOCS instrument is divided into eight main research objectives, each with a series of items addressing a specific research question, as presented below. See Supporting Statement C, Appendix B for a description and justification of the items.

- I. What is the frequency and nature of crime at public schools?
 - a. What is the number of incidents, by type of crime?
 - b. What are the characteristics of those incidents?
 - i. How many incidents were reported to police?
 - ii. How many incidents were hate-crimes?

- iii. How many were gang-related?
 - c. How many schools report violent deaths?
 - d. How many schools report school shootings?
 - e. How many schools report disruptions for violent threats?
- II. What is the frequency and nature of discipline problems and disorder at public schools?
 - a. What types of discipline problems and disorder occur at public schools?
 - b. How serious are the problems?
- III. What disciplinary actions do public schools use?
 - a. What types of disciplinary actions were available to principals?
 - b. How many disciplinary actions were taken, by type of action and offense?
- IV. What practices to prevent/reduce crime and violence do public schools use?
 - a. How do schools monitor student behavior?
 - b. How do schools control student behavior?
 - c. How do schools monitor and secure the physical grounds?
 - d. How do schools limit access to the school?
 - e. How do schools plan for crime and violence?
 - f. How do schools involve law enforcement?
- V. What formal programs designed to prevent/reduce crime and violence do public schools use?
 - a. Which programs target students, teachers, parents, and other community members?
 - b. What are the characteristics of the programs?
 - c. What training is provided to staff?
- VI. What efforts used by public schools to prevent/reduce crime and violence involve various stakeholders (i.e. law enforcement, parents, juvenile justice agencies, mental health agencies, social services, business community)?
 - a. In what activities are stakeholders involved?
 - b. How much are stakeholders involved?
- VII. What problems do principals encounter in preventing/reducing crime and violence in public schools?
- VIII. What school characteristics might be related to the research questions above?
 - a. What are the demographic characteristics of schools?

- b. What are the characteristics of the student population?
- c. What is the average student/teacher ratio?
- d. What are the general measures of school climate, such as truancy or student mobility?

A.17. Approval to not Display Expiration Date for OMB Approval

We are not seeking approval to not display the expiration date of OMB approval.

A.18. Exceptions to the Certification

There are no exceptions to the certification statement.