

Paperwork Reduction Act Submission Supporting Statement

Annual Mandatory Collection of Elementary and Secondary Education Data through *EDFacts*

Part B. Collections of Information Employing Statistical Methods. Part B applies to the CRDC portion of this collection.

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on Form 83-I is checked “yes,” the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

- 1. Describe the potential respondent universe (including a numerical estimate) and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, state and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.**

This section describes the procedures that will be used for any CRDC that is collected from a sample of LEAs. The potential respondent universe for the CRDC is the universe of elementary and secondary public school agencies in the United States, which comprises approximately 18,000 LEAs. However, for drawing the CRDC sample, ED has used a universe that is limited to certain types of LEAs. The primary source data are collected by *EDFacts* and compiled and maintained by the National Center for Education Statistics (NCES) as the Common Core of Data (CCD) and only CCD types 1, 2, 3, and 4 agencies are included in the CRDC universe¹. Selected charter schools, juvenile justice agencies that provide education services, and state operated programs for special populations of students (such as schools for the deaf and schools for the blind) are added to the universe if they are not already in the CCD list. This CRDC universe includes approximately 14,200 LEAs.

The CRDC, which has collected data from school districts (LEAs) since 1968, has generally included a sample of approximately 6,000 school districts. In 1976 and 2000, data were collected from a universe of school districts. The SY 2009-10 sample size was 7,000 school districts which allowed sampling all districts with more than 3,000 students.

¹ Type 1 is regular school district, type 2 is supervisory union component, type 3 is administrative center of a supervisory union, and type 4 is Regional Educational Service Agency. Types 3 and 4 are included in the universe only if they operate schools with students that attend for at least half day.

This will provide a significantly more comprehensive picture of the access to equal educational opportunity for all students. These data will be used extensively by OCR and by other offices in ED for programmatic and policy purposes.

Approximate counts of the CRDC universe and the sample for the SY 2009-10 CRDC by strata are shown in the table below.

Enrollment stratum	Total in Universe	Total in Sample
1 – 300*	3,044	610
301 – 3,000	7,763	2,887
3001 – 5,000	1,456	1,456
5,001-25,000	1,701	1,701
25001 +	275	275
Total	14,239	6,929

The expected response rate for the SY 2009-10 CRDC is between 95% and 98% of the sample LEAs, which would be approximately 46% to 48% of the LEAs in the universe.

The response rate on the 2006 CRDC, which was the most recent administration of this survey, was 100% of the eligible LEAs in the sample, which was 42% of the LEAs in the universe.

2. Describe the procedures for the collection of information, including:

- **Statistical methodology for stratification and sample selection.**

The potential respondent universe for any sample draw will be the universe of public elementary and secondary school agencies collected by *EDFacts* and compiled and maintained by the National Center for Education Statistics (NCES) as the Common Core of Data (CCD). It includes districts with membership whose agency-type code in the CCD is

- 1—Local school district,
- 2—Local school district component of a supervisory union,
- 3—Administrative center of a supervisory union (only those that operate one or more schools), and
- 4—Regional education service agency.

Districts with no membership or missing membership at the district level are generally excluded, except in some special cases, such as where membership data were available for the associated schools. Additionally, some education agencies not in the above types are included in the sampling frame under the “selected with certainty” provision described below.

The sample drawn for SY 2011-12 includes both LEAs that were “selected with certainty” and LEAs selected by probability through a stratified sampling design.

The following LEAs are “selected with certainty,” that is, all LEAs that meet any one of these criteria are included in the sample:

1. All LEAs in states with 25 or fewer regular public school LEAs.

2. All LEAs with 3,000 or more students.
3. All LEAs currently or recently under Department of Justice court orders.
4. Selected state operated educational programs (such as schools for the deaf, schools for the blind).
5. All LEAs that were granted a deferral for the most recent previous CRDC.
6. Other specified LEAs identified by ED, including selected LEAs identified by ED's Office for Civil Rights and selected juvenile justice education entities, chosen in collaboration with the Department of Justice.

Additional LEAs are selected by probability using a multi-state rolling stratified sample design. This approach used strata divided by size of district, and sub-strata of high/low proportion of minority students. The percentage of LEAs selected varies by state

The certainty districts are removed from the sampling frame and the sample is drawn according to the above design from the reduced sampling frame.

- **Estimation procedure.**

Respondents are asked to submit exact counts, not estimates.

- **Degree of accuracy needed for the purpose described in the justification.**

The Department's Office for Civil Rights (OCR) is responsible for implementing civil rights laws, and the primary purpose of the Civil Rights Data Collection (CRDC) is to provide data to support OCR's compliance and enforcement activities through use of the data from the surveyed LEAs. These data meet the degree of accuracy necessary. The methodology used for selecting the sample and in-depth analysis of non-respondent LEAs and/or schools and missing items within surveys ensure that the state and national projections yield statistically sound conclusions for the universe.

- **Unusual problems requiring specialized sampling procedures, and**

The Department has not found unusual problems requiring specialized sampling procedures beyond those described above.

- **Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

The Department has historically conducted this survey biennially to reduce burden. The SY 2009-10 survey was the first in three years because the planned 2008 survey was not conducted because of a delay in approval of the Department's FY 2009 budget. No survey will be conducted in SY 2010-11. The next survey will be SY 2011-12. This CRDC will be a universe of all LEAs.

3. Describe methods to maximize response and to deal with issues of non-response.

The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield “reliable” data that can be generalized to the universe studied.

Historically the civil rights survey has had a very high response rate. In 2000, the predecessor Elementary and Secondary (E&S) Survey was sent to a universe of all school districts and schools in the United States. The overall response rates were 97% of all school districts and 99% of all schools. The overall response rates for the 2002 E&S Survey were 98% for school districts and 98% for schools. For the 2004 Civil Rights Data Collection, the response rates, including partial respondents to the data collection, were approximately 97% of all districts, and 97% of all schools. The 2006 Civil Rights Data Collection achieved an unprecedented 100% response rate for school districts and a 99.6 % response rate for schools. If school districts fail to respond in a timely manner, the contractor for the data collection, with assistance from OCR as necessary, provides extensive outreach and assistance to the greatest extent possible until the districts respond, or the final deadline for accepting data has passed.

For any CRDC based upon a sample, statistical projections for most items will be calculated for the nation and for each state, basing the calculations on the methodology used for selecting the sample and in-depth analysis of non-respondent LEAs and/or schools and missing items within surveys to yield statistically sound conclusions for the universe. Data will be weighted to compensate for schools that did not provide usable data and values will be imputed on an item-by-item basis to compensate for item non-response. Such analyses for the 2004 and 2006 CRDCs are available on ED’s Web site at: <http://www.ed.gov/about/offices/list/ocr/data.html?src=rt>

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

Content. For the 2009-10 CRDC, the Department conducted five record keeping site visits. The respondents were selected to encompass a group that varies by urbanity, region, size, and level of reporting (LEA vs. state agency). Respondents were asked to provide feedback on the definitions and on any general issues they wished to raise about the CRDC or their recordkeeping practices. They were also provided a mock-up of the survey and asked whether they kept the type of requested data.

Specifically, for each question on the survey, respondents were asked: 1) Can you provide this information using your existing recordkeeping systems? 2) If yes, can you easily provide this data, or will you be required to perform manual or other non-routine operations in order to provide it? Please describe the difficulty of those alternative methods; and 3) if you cannot provide the information requested, why not?

Respondents reported no difficulty providing data for the large majority of the current and proposed CRDC questions using their existing recordkeeping systems. They also reported that the administration of the survey in two parts would not cause difficulties.

To the extent respondents expressed difficulty with any of the requested data elements, it was with 1) responding to SAT and ACT test participation questions, since this information must be gathered from data reported to LEAs by outside agencies; and 2) reporting on harassment and bullying, for which some LEAs do not have reporting mechanisms in place.

Sample. No specific tests of the sampling procedures will be undertaken because of the successful history of these procedures. The rolling stratified sample design with certainty selections was used to select the samples for the 1998, 2002, 2004, and 2006 and 2009-10 civil rights surveys. (The 2000 CRD was a universal collection and thus no sample was drawn.)

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

The CRDC is conducted in collaboration between the Office for Civil Rights, Russlynn Ali, Assistant Secretary; and the Performance Information Management Service, Ross Santy, Director: (202) 401-1259. The data will be collected through *EDFacts*, managed by the Performance Information Management Service.

Technical services for the collection and the analysis of data will be provided by the Department's contractor for *EDFacts*: 2020 Company, Inc., LLC, Haresh Bhungalia, Co-Founder, 800-327-9015.