

January 30, 2013

Private School Universe Survey (PSS) August 2013—July 2016

Supporting Statement Part A

Request for OMB Review
OMB# 1850-0641 v.5

Submitted by

National Center for Education Statistics
U.S. Department of Education

SUPPORTING STATEMENT
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Request for Clearance for the Private School Universe Survey

This is a request for clearance to conduct the 2013-14 and 2015-16 Private School Universe Survey (PSS) data collections and the 2015-16 PSS frame-development activities.

A. JUSTIFICATION

A1. Why Is This Information Needed?

The National Center for Education Statistics (NCES), within the U.S. Department of Education, conducts PSS, a national survey of private elementary and secondary schools. The PSS is designed to collect biennial data on the total number of private schools, teachers, and students; and create an NCES universe frame of private schools that then serve as a sampling frame for NCES surveys of private schools. This survey is an ongoing project to improve NCES universe and sample data on private schools.

Since 1980, NCES has annually collected descriptive universe data on the number of public school teachers, students, and high school graduates through the NCES Common Core of Data (CCD) for the public schools. Private schools represent approximately 25 percent of all elementary and secondary schools in the United States and enroll an estimated 10 percent of the nation's elementary and secondary students. With increasing policy concern about choice and alternatives in education, the interest and need for data on private education has also increased. NCES has recognized this need to assure that the collection of data on private schools be comparable to public school data.

In 1989, NCES established an Interagency Agreement with the U.S. Census Bureau to collect and process private school data. The PSS was conducted in 1989-90, 1991-92, 1993-94, 1995-96, 1997-98, 1999-2000, 2001-02, 2003-04, 2005-06, 2007-08, and 2009-10 and those data have been released. The 2011-12 PSS data have been collected and are scheduled to be released in April 2013. NCES is authorized to conduct this survey under the Education Sciences Reform Act of 2002 (ESRA: 20 U.S.C., § 9543).

A2. Purpose and Uses of the Data

NCES has conducted several national sample surveys of private elementary and secondary schools beginning in the 1970s. Recently, Schools and Staffing Surveys (SASS) for 1987-88, 1990-91, 1993-94, 1999-2000, 2003-04, 2007-08, and 2011-12 provided estimates of the numbers and characteristics of private schools, teachers, and students for comparison among private schools and with public schools. Even with successive administrations of SASS providing detailed trend data on a sample of private schools¹, there is a need for biennial universe data on a limited number of key statistics and a need to update the private school sampling frame for births/deaths of private schools every several years.

Except for previous PSS, the sampling frames available for private school surveys have not been timely nor have they provided complete coverage. Commercial lists, such as those developed by QED, are not complete and lack sufficient detail on school characteristics to select samples according to NCES specifications. Lists maintained by organizations of private schools are also incomplete because they only contain listings of their member schools. The purposes of this project are, therefore, to: collect biennial data on the total number of private schools, teachers, and students; and create an NCES universe frame of private schools that can serve as a sampling frame for NCES surveys of private schools.

¹SASS is scheduled to end with the 2011-12 collection; it appears at the present time that its replacement, the National Teacher and Principal Survey (NTPS), which is currently under development, will include private school teacher and principal components, but not a private school component.

A3. Appropriate Use of Information Technology

Imaging and CATI

As in the 2003-04, 2005-06, 2007-08, 2009-10, and 2011-12 PSS collections, the data from all 2013-14 and 2015-16 PSS paper questionnaires will be imaged and stored electronically. And, as in all previous PSS collections, CATI follow-up will be used in 2013-14 and 2015-16 for mail/internet nonrespondents (an estimated 20 percent of all responses will be collected by CATI). Furthermore, the 2013-14 and 2015-16 PSS, like the 2011-12, 2009-10, and 2005-06 PSS, will offer an internet response option to most schools (Amish and Mennonite schools will not be offered an internet response option).

A4. Efforts to Identify Duplication

One of the criteria for PSS is to collect only data that are not available elsewhere. The Elementary/Secondary Sample Survey Studies Program reviewed existing private school data collection efforts and found no other private school data collection effort existing or planned that will update the private school universe.

A5. Small Business or Entities

The PSS collects data from elementary and secondary private schools. Private schools are small entities. The respondent burden is minimal because of the limited questionnaire size (22 items) and because the data that are being collected are readily available from the administrative files of most private elementary and secondary schools.

A6. Frequency of Data Collection

The current plan is to continue to conduct the PSS for the entire private school universe biennially. If the PSS were collected less frequently, NCES would be forced to use sampling frames with significantly poorer coverage for its surveys of private schools.

A7. Special Circumstances of Data Collection

There are no circumstances that will require special data collection efforts.

A8. Consultations Outside the Agency

Key offices inside the U.S. Department of Education have reviewed the draft survey. Prior to the first PSS in 1989-90, NCES discussed its data collection plans with a number of private school associations. Representatives from the following private school associations participated in these initial discussions.

Association

Accelerated Christian Education
Agudath Israel of America
American Association of Christian Schools
American Montessori Society
Association of Christian Schools International

Contact

Dr. Donald Howard
Rabbi Morton Avigdor
Dr. Robert Stashesky
Ms. Bretta Weiss
Dr. John Holmes

Association of Evangelical Lutheran Churches
Association of Military Colleges and Schools

Christian Schools International
Council for American Private Education
Evangelical Lutheran Church in America
Friends Council on Education
General Conference of Seventh Day Adventists
Jesuit Secondary Education Association
Lutheran Church, Missouri Synod
National Association of Episcopal Schools
National Association of Independent Schools
National Association of Private Schools for
Exceptional Children
National Catholic Educational Association
National Coalition of Alternative Community Schools
National Independent Private School Association
National Society of Hebrew Day Schools
Oral Roberts Educational Fellowship
Solomon Schechter Day Schools
U.S. Catholic Conference
Wisconsin Evangelical Lutheran Synod

Mr. Kretzman
Lt. General Willard
W. Scott
Dr. Sheri D. Haan
Ms. Joyce McCray
Mrs. Billie Navarro
Ms. Kaye Edstene
Dr. G. L. Plubell
Rev. Carl E. Meirose
Mr. Carl Moser
Ms. Ann Gordon
Dr. Peter Relic
Ms. Sherry L. Kolbe

Mr. Frederick Brigham
Ms. Pat Montgomery
Ms. Carolyn Crider
Rabbi Fishman
Dr. David Hand
Mr. Meir Efrati
Father William Davis
Dr. Daniel Schmeling

Since the 1989-90 PSS, private school group meetings have been held annually with affiliation representatives to inform them of the PSS status. The last meeting was held in November 2012; the following private school groups were represented at the meeting:

Agudath Israel of America
American Association of Christian Schools
Association of Christian Schools International
Association of Christian Teachers and Schools
Council for American Private Education
National Association of Independent Schools

National Catholic Educational Association
National Christian School Association
Oral Roberts University Education Fellowship
Southern Baptist Association of Christian Schools
U.S. Conference of Catholic Bishops
Wisconsin Evangelical Lutheran Synod Schools

David Tanenbaum
Courtney Holloway
George Tryfiates
R. J. Nelson
Joseph McTighe
Amada Torres
Hilary LaMonte
Martha Galindo
Dale McDonald
Philip Patterson
Donnie Peal
Edward Gamble
Suzanne Bellenoit
Scott Gostchock

A9. Payment or Gifts to Respondents

Not applicable.

A10. Assurance of Confidentiality

The law does not require disclosure protection of institutions, such as schools; therefore, no assurance of confidentiality is provided to respondents.

A11. Need for the Use of Sensitive Questions

The questions contained in this survey—grade levels taught, length of the school day and school year, religious orientation, type of school, number of teachers, enrollment, race/ethnicity of students, and number of graduates—are not considered to be sensitive.

A12. Estimates of Information Collection Burden

2013-14 PSS

Approximately 8,000 screener calls will be made to institutions discovered in the area-frame operation (see Part B.2) to determine their eligibility for the PSS. The average length of these calls is 3 minutes, resulting in 400 hours of respondent burden for the area-frame screener operation.²

Survey questionnaires will be sent to all of the cases on the 2013-14 universe. The requested data can be easily obtained from school records. The average completion time will be 20 minutes (based on the 2011-12 PSS experience) per respondent (27,000), for a total of 9,000 hours of questionnaire respondent burden. The total respondent burden for the 2013-15 PSS, frame development (400) plus questionnaire (9,000), is 9,400 hours

Table of 2013-14 PSS Data Collection Instruments

Document Type	Instrument File	Respondents	Responses	Burden Time per Response	Available Electronically	Percent Responding Electronically	Electronic Capability	Total Burden Hours
Private Schools Telephone Script	Appendix C	8,000	8,000	3 min	no	0%	Telephone only	400
PSS Questionnaire	Appendix D	27,000	27,000	20 min	yes	18%	Both electronic and paper versions	9,000
Total Burden		27,000	35,000					9,400

The standard NCES procedure for estimating costs to school staff is to multiply the estimated total survey reporting hours (9,400) by the average salary of school employees (estimated to be \$20.00 per hour). Following these conventions, the “cost” to the respondents is estimated to be about \$188,000 for the 2013-14 PSS.

2015-16 PSS

During the development of the list-frame portion of the 2015-16 PSS universe (see Part B.2), lists of private schools will be requested and received from approximately 100 state agencies and private school associations. It is estimated that each list response will take an hour, resulting in 100 hours of respondent burden. Approximately 6,600 screener calls will be made to institutions discovered in the list-frame operation to determine their eligibility for the PSS. The average length of these calls is 3 minutes, resulting in 330 hours of respondent burden for the list-frame screener operation. Total response burden for 2015-16 PSS list-frame development activities is 430 hours.

² The respondent burden for the 2013-14 PSS list-frame operation is included in the July 2010-June 2013 PSS clearance.

Approximately 8,000 screener calls will be made to institutions discovered in the area-frame operation to determine their eligibility for the PSS. The average length of these calls is 3 minutes, resulting in 400 hours of respondent burden for the area-frame screener operation. The total response burden for 2013-14 PSS frame development is 830 hours.

Survey questionnaires will be sent to all of the cases on the 2015-16 universe.³ The requested data can be easily obtained from school records. The average completion time will be 20 minutes (based on the 2011-12 PSS experience) per respondent (27,000), for a total of 9,000 hours of questionnaire respondent burden. The total respondent burden for the 2015-16 PSS, frame development (830) plus questionnaire (9,000), is (9,830) hours

Table of 2015-16 PSS Data Collection Instruments

Document Type	Instrument File	Respondents	Responses	Burden Time per Response	Available Electronically	Percent Responding Electronically	Electronic Capability	Total Burden Hours
State Agencies (Education, Social Services, Child Care) School List Request Letter	Appendix A	70	70	60 min	no	0.9	Both electronic and paper versions	70
Private School Association School List Request Letter	Appendix B	30	30	60 min	no	0.5	Both electronic and paper versions	30
Private School Telephone Script	Appendix C	14,600	14,600	3 min	no	0	Telephone only	730
PSS Questionnaire	Appendix D	27,000	27,000	20 min	yes	0.18	Both electronic and paper versions	9,000
Total Burden Hours		27,100	41,700					9,830

The standard NCES procedure for estimating costs to school staff is to multiply the estimated total survey reporting hours (9,830) by the average salary of school employees (estimated to be \$21.00 per hour). Following these conventions, the “cost” to the respondents is estimated to be about \$206,430 for the 2015-16 PSS.

The average annual burden for the 2013-14 and 2015-16 collections over the three year period is:

18,034 respondents
25,567 responses
6,410 burden hours

A13. Capital and Operating Costs to Respondents

Respondents will not incur any costs other than their time to respond.

A14. Estimates of Cost to the Federal Government

NCES estimates that the total federal cost for the 2013-14 PSS is approximately **\$3,650,000** (\$132,019 in FY 2012, \$1,511,668 in FY 2013, \$1,737,142 in FY 2014, and \$269,171 in FY 2015), and for the 2015-16 PSS is approximately **\$3,905,000** (\$141,234 in FY 2014, \$1,617,182 in FY 2015, \$1,858,394 in FY 2016, and \$288,190 in FY 17). This estimate was compiled from individual estimates developed within

³ The PSS and the SASS were originally scheduled to both be collected during 2015-16. In the past, the private schools in the SASS sample would receive the SASS private school questionnaire only and not the PSS questionnaire. PSS records for these schools were created electronically from the SASS private school file. The respondent burden hours for these schools were included in the SASS burden hours. Since SASS is scheduled to end with the 2011-12 SASS collection and it is unclear at the present time whether its replacement, the National Teacher and Principal Survey, will have a private school questionnaire, the 2015-16 PSS burden includes the entire data collection burden hours associated with the 2015-16 universe.

each U.S. Census Bureau division involved in the survey. Estimates were based on the universe size, the length of the questionnaire, and required data processing. Administrative overhead, design, printing, and mailing costs were included. Thus the average annual cost for the 2013-14 and 2015-16 collections over the three year period is **\$2,518,333**.

A15. Changes in Burden

The burden associated with the 2013-14 and 2015-16 PSS (9,400 and 9,830 hours respectively) is somewhat greater than that of the 2011-12 PSS (9,127 hours). This increase is the net result of a number of factors. The 2013-14 PSS list-frame development burden was included in the last PSS clearance (2011-2013) and is not included in this clearance. The estimated number of interviews is increased from 26,200 (2011-12 PSS) to 27,000 (2013-14 and 2015-16 PSS), reflecting both the inclusion of 3,000 schools that were included with the 2011-12 SASS collection burden and the reduction in the total number of private schools that has been occurring since 2007. The estimated completion time for the PSS questionnaire is revised upward from 19 minutes (based on the 2007-08 PSS) to 20 minutes (based on the 2011-12 PSS). Additionally, because PSS is biennial, the last OMB 3-year clearance cycle (2010-13) encompassed only one full scale data collection, while the cycle of this request (2013-2016) encompasses two full scale data collections.

A16. Publication Plans/Time Schedule

2013-14 PSS

The first mailing of questionnaires is scheduled for September 25, 2013. A second mailout for schools that did not respond to the first mailout is scheduled for November 2013. Telephone follow-up for nonresponse will begin in January 2014. Personal visit follow-up for mail/internet noninterviews and CATI noninterviews is scheduled for January 2014 through May 2014.

The 2013-14 PSS survey will be conducted according to the following time schedule:

Conduct Screener Calls for Area-Frame Schools	9/3/2013-9/30/2013
1st Survey Mailout	9/25/2013
2nd Survey Mailout	11/2013
CATI/Field Followup	1/2014-5/2014
Check-in, Clerical Edit	9/2013-5/2014
Process Data	11/2013-10/2014
Final File	11/2014
NCES Reports Results	4/2015

2015-16 PSS

The first mailing of questionnaires is scheduled for September 2015. A second mailout for schools that did not respond to the first mailout is scheduled for November 2015. Telephone follow-up for nonresponse will begin in January 2016. Personal visit follow-up for mail/internet noninterviews and CATI noninterviews is scheduled for January 2016 through May 2016.

The 2015-16 PSS survey will be conducted according to the following time schedule:

Request Private School Lists	8/1/2014
Conduct Screener Calls for List-Frame Schools	8/2014-5/2015
Conduct Screener Calls for Area-Frame Schools	9/2015-9/2015

1st Survey Mailout	9/2015
2nd Survey Mailout	11/2015
CATI/Field Followup	1/2016-5/2016
Check-in, Clerical Edit	9/2015-5/2016
Process Data	11/2015-10/2016
Final File	11/2016
NCES Reports Results	4/2017

One of the purposes of this survey is to produce descriptive statistics about the number of private schools, teachers, students, and high school graduates. Survey responses will be weighted to produce national estimates. Tabulations will be produced for each data item. Cross tabulations of data items will be made with selected classification variables such as religious orientation (Catholic—parochial, diocesan, private; other religious—conservative Christian, affiliated, unaffiliated; nonsectarian—regular, special emphasis, special education); size of student body (less than 50, 50 to 149, 150 to 299, 300 to 499, 500 to 749, 750 or more); and level of instruction (elementary, secondary, combined). See Appendix E for examples of table shells (for a more comprehensive set of tables see *Characteristics of Private Schools in the United States: Results From the 2009-10 Private School Universe Survey, NCES 2011-339*, which can be accessed from the PSS web page at <http://nces.ed.gov/surveys/pss>). NCES will publish the 2013-14 survey results in April 2015 and the 2015-16 survey results in April 2017.

A17. Request Not to Display Expiration Date

Not applicable.

A18. Exceptions to the Certifications

Not applicable.