



December 5, 2013

## MEMORANDUM

**To:** Shelly Martinez, OMB; Kashka Kubzdela, NCES

**From:** Abby Potts, NCES

**Subject:** Responses to OMB Passback on 2013-14 Civil Rights Data Collection (CRDC) Data Submission System Process Improvement and Feasibility Study (OMB# 1850-0803 v.90 )

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This memo provides responses to the OMB passback sent on 12/4.

1. From the advance materials provided, it is not clear how individuals within a site will be selected and how different portions of the interviews will be partitioned, though we think that is the intent.

*NCES:* Individuals responsible for data collection and entry (e.g., technical programmer for flat file submissions or data entry for web-based submissions), coordinating the process the CRDC data submission and certification of the CRDC submission will be recruited from within each site. Depending on the LEA, one person or several individuals within the selected site may fulfill all of these responsibilities. Based on records from the 2011-12 CRDC, NCES will likely be able to determine whether one or several individuals within the LEA are responsible for these CRDC functions. However, due to staff changes, the specific contacts may have changed or well as their specific roles and responsibilities.

The initial site recruitment will be directed to the primary point of contact for the 2011-12 CRDC. The recruitment script has been edited to clarify that the site visits are designed to gather feedback from individuals responsible for data collection and entry, coordinating the submission, and certification. During the scheduling process, we will gather the names of the specific individuals within the site that will participate in the interviews as well as their roles and responsibilities. This information will be used to determine the applicable portions of the interview protocol for each respondent. For example, for individuals solely responsible for reviewing and certifying the CRDC, the interview protocol will skip from question #1 to question #6.

2. We do not see any information about burden being provided to prospective participants, as is required. Please explain and direct us to this information if we are missing it.

*NCES:* The expected length of the interview is provided as part of the recruitment email and script. The anticipated burden has also been added to the site visit confirmation letter along with clarification about the burden for sites with multiple individuals with CRDC responsibilities.

3. Where are respondents told to collect materials in advance to have ready for the interview?

*NCES:* The advance letter to school districts clarifies that materials related to the CRDC submission process should be gathered in advance and available for the scheduled site visit. Additionally, once the LEA has agreed to participate, we will review the expectations for the site visit, including the availability of any CRDC data-gathering materials, before scheduling a date and time for the site visit.

4. In the FAQs, one might interpret the phrase "long-hidden data" as accusing the respondent of hiding something. That might not be very well received.

*NCES:* This phrase has been removed from the FAQ.