

NATIONAL CENTER FOR EDUCATION STATISTICS

Volume I

Supporting Statement

*2013-14 Civil Rights Data Collection (CRDC)
Data Submission System
Process Improvement and Feasibility Study*

OMB# 1850-0803 v.90

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1. Submittal Related Information

This material is being submitted under the generic National Center for Education Statistics (NCES) clearance agreement (OMB #1850-0803), which provides for NCES to conduct various procedures (e.g. exploratory, cognitive, usability, or follow-up interviews; focus groups; feasibility studies; pilot tests, etc.) to develop, test, and improve its data collection instruments and methodologies.

2. Background and Study Rationale

The purpose of the U.S. Department of Education (ED) Civil Rights Data Collection (CRDC) is to obtain data related to the nation's public school districts and elementary and secondary schools' obligation to provide equal educational opportunity. To fulfill this goal, the CRDC collects a variety of information, including student enrollment and educational programs and services data that are disaggregated by race/ethnicity, sex, limited English proficiency, and disability. The CRDC is a longstanding and critical aspect of the overall enforcement and monitoring strategy used by the Department's Office for Civil Rights (OCR) to ensure that recipients of the U.S. Department of Education's federal financial assistance do not discriminate on the basis of race, color, national origin, sex, and disability. The CRDC data are also used by other ED offices as well as by policymakers and researchers outside of ED for research and statistical purposes.

The U.S. Department of Education has collected CRDC data on school characteristics, programs, services, and student outcomes directly from local education agencies (LEAs) on a biennial basis since 1968. For many years, the collection operated as the Elementary and Secondary School Civil Rights Compliance Report (OMB# 1870-0500). Since 2004, the CRDC has been conducted primarily online (flat file submissions and paper surveys were also allowed). With the exception of two SEAs, each participating LEA submits an LEA summary survey and a survey about each school in the LEA.

Feedback from prior CRDC administrations indicates that some LEAs experience difficulty responding to the CRDC. The issues documented fall into two categories: content and data collection tool. In the category of content, one of the issues is reporting burden. For example, respondents report that some of the requested data are already submitted to their SEAs (although these data items are not currently submitted by their SEAs to ED) and that other requested data are not maintained by schools or LEAs at the level of granularity required by the CRDC. Other content issues include a lack of clarity around definitions of key terms. Respondents also report that the current CRDC data collection tool has performance issues; in particular, respondents mention that there are not enough built-in edits and that some of the edit messages they receive are unclear. Further, analysts have raised concerns about the quality of some questions or items collected as part of the CRDC, especially the items collected for the first time by the 2009-10 CRDC.

In light of these and other concerns, the National Center for Education Statistics (NCES), within the U.S. Department of Education, has partnered with OCR to improve the CRDC data collection process. This is a continuation of the successful partnership within ED. Beginning with the 2004 CRDC, the CRDC has been a part of the ED initiative to better coordinate and consolidate data reporting from SEAs and LEAs across ED through a data collection known as *EDFacts*. Under *EDFacts*, the CRDC transitioned from being primarily a paper form-based data collection system to a primarily web-based collection system designed and operated by *EDFacts* as part of their data collection contract. The partnership between the CRDC and *EDFacts* has been a successful partnership that continues with the transition of *EDFacts* to the Administrative Data Division of NCES, which took place in the fall of 2013.

Numerous NCES studies, including the Schools and Staffing Survey and the School Crime Survey, are planning to supplement their data collections with data from the CRDC. Therefore, in partnership with OCR, NCES is committed to redesigning all aspects of the CRDC data submission process and improve alignment of CRDC data with other surveys. In the initial stage, NCES is now working to develop a new data collection tool for the 2013-14 CRDC that will improve data quality, reduce burden on respondents, and improve the usability of the data collection tool and data feedbacks reports.

As part of the design of the new tool, we are first seeking to understand more about how LEAs access and house the data they need to report during the CRDC data collection period, the procedures they have in place for reporting data, and problems they face in meeting the CRDC request for information. Understanding of these areas will help us develop tools and procedures that better facilitate reporting and improve data quality. To research these issues, we are requesting clearance to conduct a process improvement and feasibility study that will consist of in-person site visits with schools, LEAs, SEAs, and OCR regional offices.

3. Purpose

The site visits will be used to identify reporting procedures, periodicity of data availability, problems with specific data elements, and data formats. The site visits will also gather information on ways in which the online data collection tool can assist in improving data quality and to learn what types of feedback reports LEAs, SEAs, schools, and other users would like to be receiving from the CRDC system.

A key goal of the site visits is to understand the process that LEAs use to complete a submission and to retrieve examples of data sources, forms, or spreadsheets that are used to find or collect data within the LEA. The overarching research questions for the site visits are:

1. To what extent are data collected by the CRDC currently maintained as part of a state longitudinal data system? Do SEAs currently have the capacity to provide LEAs or ED with data that is collected by the CRDC?
2. When and how often do SEAs/LEAs collect CRDC-related data?
3. Who are the points-of-contact (POCs) and what is their data collection role?
4. What is the data collection cycle like?
5. What actions do LEAs need to take to complete their submissions?
6. What format do SEAs/LEAs store the data in?
7. What current CRDC tools are useful for POCs? (webinars, PSC, forms, templates, online tool)
8. Which data elements are difficult for LEAs or schools to report? Which data elements are easy to report?
9. What is the process for verifying and certifying LEA data? Are subject matter experts consulted for specific elements of the CRDC?
10. What are the reasons LEAs/SEAs collect the CRDC data? How are the data used? Are there specific data elements collected just for the purpose of the CRDC reporting?
11. How do schools report data to LEAs? What is the reporting process and cycle?
12. What can be improved about the CRDC communication process with POCs and other leadership?
13. What other general feedback do LEAs/SEAs/schools/OCR offices have?

4. Design

Members of the study team will conduct a 2-day visit in pairs to each of the 15 selected LEAs across 10 states, one school in each LEA, and 2 OCR regional offices. The sites proposed will reflect a diverse set of districts in terms of size, urbanicity, level of sophistication of SEA and LEA data systems, and programs offered.

Recruitment

Sites will be recruited by NCES contractors, Sanamatrix and AIR, in consultation with NCES. Recruitment will be conducted by phone calls or emails, depending on the information available, to superintendents, CRDC points-of-contact, or other key personnel. Since not all sites recruited will be able to participate in the site visits due to scheduling conflicts or time constraints, NCES anticipates contacting approximately 20 LEAs and 12 SEAs in order to recruit the target 15 LEAs and 10 SEAs. Staff of each recruited LEA will suggest a school to interview and help schedule the visit. Only two OCR field offices will be contacted for recruitment as the offices are expected to participate upon request. The recruitment process is expected to take 5-20 minutes per entity.

The recruitment protocol will be tailored to the specific person, LEA, SEA, school, or OCR office being contacted. 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 of 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. The interview will be partitioned according to role(s) of the individuals within the selected site(s). However, all recruitment communication will contain the following key information:

- Purpose of the study
- Study sponsorship
- Importance of participation
- Voluntary nature of participation
- Estimated burden

Site visits

Site visits will be conducted by Sanamatrix and AIR and will include: 1) an in-person interview with an SEA data coordinator; 2) on-site interviews with at least two LEA officials, such as the assistant superintendent and the data coordinator, depending on the size of the district; 3) at least one interview with a school administrator; and 4) interviews with a CRDC knowledgeable staff member at two OCR regional offices. Both researchers on each site visit team will attend all interviews. All interviews will be audio-recorded (with participant approval), and the site team will produce detailed notes. Throughout the data collection process, we will hold regular debriefing meetings about site visits.

Training

All data collection staff will participate in site visit training to ensure familiarity with and understanding of the purpose of the study, content of the protocols, and site visit procedures. The study team will be trained in what to look for on-site and, using objective and non-biased interview techniques, how to motivate respondents to provide accurate and complete information during interviews. The team will also be trained in key procedural issues such as guidelines for ensuring privacy during interviews, taking high-quality interview notes, and providing required follow-up communications.

Materials

The advance letter to be sent to participants and the protocols to guide the site visits are provided in the attachments A-G.

5. Consultations Outside the Agency

The CRDC 2013-14 and 2015-16 proposed design and content was sent out for public comment, which was received in August 2013. Additionally, OCR maintains a CRDC working group, which currently consists of 12 LEA and SEA contacts from 12 different states: California, Louisiana, Massachusetts, New Jersey, Kansas, Missouri, North Carolina, Virginia, Ohio, Washington, and Wisconsin. Florida has also been a long-standing member of the working group, but is currently not part of the group due to a recent change in staffing. The working group provides feedback on design and content.

6. Payments to Respondents

Respondents will not receive payments.

7. Assurance of Confidentiality

The study will ask about data holdings and processes of public institutions and will not collect personal data, therefore no confidentiality will be promised. Participation in the study is voluntary and participating sites will receive a letter before interviews are conducted with the following statement noting the study sponsorship and voluntary nature: “Sanametrix and the American Institutes for Research are conducting this study for the National Center for Education Statistics (NCES) of the U.S. Department of Education. This study is authorized by law under the Education Sciences Reform Act (ESRA, 20 U.S.C. §9543). Your participation is voluntary.”

8. Estimate of Hour Burden

We expect to spend approximately 4 hours visiting each entity per state – SEA, LEA, and school. Various LEA, SEA, and school staff will participate in the research, so each respondent will only participate in a portion of questioning. This estimated to be about 1-hour per type of respondent if there are multiple individuals fulfilling the various CRDC responsibilities (official contact, data gatherer, data inputer/technical, data certifier). Per PRA, the burden for federal employees at the two OCR regional offices is not counted in the total. Therefore we anticipate contacting up to 47 non-federal respondents (SEAs, LEAs, and schools), for up to 97 responses (47 recruitment calls + 40 interviews), over 172 burden hours.

Entity Interviewed	Estimated Number Contacted	Estimated Recruitment Time (min)	Number Interviewed	Estimated Interview Time (hrs)	Total Estimated Burden Time
SEA	12	10	10	4	42
LEA	20	20	15	4	67
School	15	10	15	4	63
OCR regional offices	2	5	2	4	8
Total	47	-	40	-	172

9. Estimate of Cost Burden

There is no direct cost to respondents.

10. Reporting Plans

After each site visit, the researchers will prepare a summary report that includes: concerns about the collection tool and suggested improvements that could be made to reduce burden and improve data quality. Additionally, post-visit follow-up will include sending a state-specific report to the state staff involved in the site visits. These reports will be provided to each state within 3 weeks of the state site visit.

11. Project Schedule

Recruitment will begin upon OMB approval. The site visits will begin as soon as possible thereafter. Visits are expected to be completed by February 28, 2014.

A report will be prepared and sent to each site 3 weeks after the site visit.

Attachment A: Recruitment Materials

Recruitment Script

Email

The U.S. Department of Education is preparing for the next Civil Rights Data Collection (CRDC), which will collect data for the 2013-14 school year. As you know, the CRDC is a valuable source of information about access to educational opportunities in our nation's public schools.

For the upcoming 2013-14 CRDC, the National Center for Education Statistics (NCES) and the Office for Civil Rights (OCR) are collaborating to design a new submission tool to reduce the reporting burden on school districts and provide actionable reports to improve the quality of CRDC data. To accomplish this goal, we need active participation and feedback from school districts to guide our development efforts.

We hope your [LEA or SEA] will be willing to participate in a site visit to guide the Department's improvements to the CRDC data collection process. Your input into the design of the new collection tool will ensure that future data collections are less burdensome and the resulting data are more helpful to you and other districts, states, schools, and data users

During the visit, staff from the NCES contractors, Sanametrix and AIR, will ask you about your plans and procedures related to the CRDC, ask you to look at data forms or spreadsheets that you use in gathering data, and talk with you and your colleagues about any problems you may have had or anticipate having in reporting the required data. To gather input, we would like to involve individuals responsible for coordinating the CRDC, data submission (e.g., technical programming for flat file submissions or data entry for web-based submissions), and certification. [LEA Only: We would also like your help recruiting a school within your LEA to better understand to process for collecting storing, and submitting data at the school level.]

The interviews are estimated to take about 4 hours, or half a day. This would be about 1-hour per type of respondent if there are multiple individuals fulfilling the various CRDC responsibilities (official contact, data gatherer, data inputer/technical, data certifier). Participation in these site visits is voluntary.

If you agree to participate, someone from NCES CRDC team will be in touch with you to discuss scheduling a site visit and to go over what to expect during the site visit. We will also work with you to provide information about the site visit to a school within your LEA. Please feel free to contact, Abby Potts, at Abby.Potts@ed.gov or (202) 502-7566 with any questions or concerns.

Phone Script

Hello, my name is _____. I work at the U.S. Department of Education and am calling in regards to the upcoming Civil Rights Data Collection, or CRDC, for the 2013-14 School Year.

[Alternative intro for contractors: I am calling from _____ on behalf of the National Center for Education Statistics in regards to the upcoming Civil Rights Data Collection for the 2013-14 school year.]

In preparation for the next CRDC, the National Center for Education Statistics (NCES) and the Office for Civil Rights (OCR) are collaborating to design a new submission tool to reduce the reporting burden on school districts.

In order for this new tool to be successful in improving the CRDC process, we need thoughtful and honest feedback from LEAs and SEAs to serve as the foundation for the new system. We are recruiting a diverse group of LEAs and SEAs to provide feedback on their experience reporting data for the 2011-12 CRDC and ways to improve the submission process for 2013-14.

I am calling to ask your [LEA or SEA] to participate in a site visit. Let me tell you about what's involved and answer any questions you may have.

During the visit, staff from the NCES contractors, Sanametrix and AIR, will ask you about your plans and procedures related to the CRDC, ask you to look at data forms or spreadsheets that you use in gathering data, and talk with you and your colleagues about any problems you may have had or anticipate having in reporting the required data. Your input into the design of the new collection tool will ensure that future data collections are less burdensome and the resulting data are more helpful to you and other districts, states, schools, and data users. Our team would also like to visit a school to better understand the process of collecting, storing, and submitting CRDC data at the school-level.

The interviews are estimated to take about 4 hours, or half a day. This would be about 1-hour per type of respondent if there are multiple individuals fulfilling the various CRDC responsibilities (official contact, data gatherer, data inputer/technical, data certifier). Participation in this site visits is voluntary.

Do you have any questions?

[Pause]

Would you be willing to participate in a site visit?

[If yes] Fantastic. Thank you for agreeing. Your input will help ensure an improved reporting system for the 2013-14 CRDC. As the next step, I'll have someone from the NCES CRDC team reach out to you to discuss scheduling options. We will also send you an introductory letter to share with a school within your LEA that may be willing to also participate in the site visit.

[If no] We know that there are many demands on your time. I completely understand. As always, you can reach out to any member of the CRDC team if you have questions about the upcoming collection or want to provide feedback to the team.

School Recruitment Materials

Introductory letter

Dear [Recipient Name]:

Your school district has agreed to assist the U.S. Department of Education's efforts to improve the Civil Rights Data Collection (CRDC) by participating in a site visit interview. The feedback collected during these interviews will improve the design of a new data collection tool led by the National Center for Education Statistics (NCES) in partnership with the Office of Civil Rights (OCR).

We hope your school will also participate in an interview to help us better understand the process of collecting, storing, and submitting CRDC data at the school-level. Your input will ensure that future data collections are less burdensome and the resulting data are more helpful to you and other districts, states, schools, and data users.

During the interview, staff from NCES's contractors, Sanametrix and AIR, will ask you about your plans and procedures related to the CRDC, ask you to look at data forms or spreadsheets that you use in gathering data, and talk with you and your colleagues about any problems you may have had or anticipate having in reporting the required data.

The interviews are estimated to take about 4 hours, or half a day. Participation in these site visits is voluntary, and your help is greatly appreciated.

If you agree to participate, someone from our CRDC team will be in touch with you to discuss scheduling a site visit and to go over what to expect during the site visit.

Sanametrix and the American Institutes for Research are conducting this study for the National Center for Education Statistics (NCES) of the U.S. Department of Education. This study is authorized by law under the Education Sciences Reform Act (ESRA, 20 U.S.C. §9543). Your participation is voluntary.

FAQ

What is the Civil Rights Data Collection?

The Civil Rights Data Collection (CRDC) is a biennial (*i.e.*, every other school year) survey required by the U.S. Department of Education's (Department) Office for Civil Rights (OCR) since 1968. The 2013–14 and 2015–16 CRDC proposes to collect data from a universe of all public local educational agencies (LEA) and schools, including juvenile justice facilities, charter schools, alternative schools, and schools serving students with disabilities.

Why are these site visits occurring?

The National Center for Education Statistics (NCES) has recently begun designing a new data collection tool for the biennial CRDC in partnership with the Office of Civil Rights. The new data collection tool aims to reduce the reporting burden on school districts and provide actionable reports to improve the quality of CRDC data. To accomplish this goal, NCES needs active participation and feedback from schools and school districts to guide development efforts. Your input into the design of the new collection tool will ensure that future data collections are less burdensome and the resulting data are more helpful to you and other districts, states, schools, and data users.

Your input into the design of the new collection tool will ensure that future data collections are less burdensome and the resulting data are more helpful to you and other districts, states, schools, and data users.

Do I have to participate?

No. Participating is voluntary.

How long will the interview take?

The interviews are estimated to take about 4 hours.

What is expected during the site visit?

During the visit, staff from NCES's contractors, Sanametrix and AIR, will ask you about your plans and procedures related to the CRDC, ask you to look at data forms or spreadsheets that you use in gathering data, and talk with you and your colleagues about any problems you may have had or anticipate having in reporting the required data

Visit Advance Letter

[on NCES letterhead]

December 10, 2013

[Recipient Name]

[Title]

[Company Name]

[Street Address]

[City, ST ZIP Code]

Dear [Recipient Name]:

Thank you for agreeing to assist us in the U.S. Department of Education's efforts to improve the Civil Rights Data Collection (CRDC). The National Center for Education Statistics (NCES) has recently begun designing a new data collection tool for the biennial CRDC in partnership with the Office of Civil Rights. Your input into the design of the new collection tool will ensure that future data collections are less burdensome and the resulting data are more helpful to you and other districts, states, schools, and data users. We greatly appreciate your help.

NCES has contracted with Sanametrix and the American Institutes for Research (AIR) to conduct the site visits. Your site visit is scheduled for [MONTH DAY, YEAR]. The interviews are estimated to take about 4 hours, or half a day. During the visit, staff from Sanametrix and AIR will ask you about your plans and procedures related to the CRDC, ask you to look at data forms or spreadsheets that you use in gathering data, and talk with you and your colleagues about any problems you may have had or anticipate having in reporting the required data. To the extent possible, please have any materials your school district used related to the CRDC data submission available for your scheduled site visit. Your input will help us design better procedures and a new data collection tool.

Someone from Sanametrix or AIR will be in touch with you to confirm your appointment and to go over what to expect during the site visit. Please feel free to contact Abby Potts at Abby.Potts@ed.gov or (202) 502-7566 with any questions or concerns.

Sincerely,

Ross Santy
Associate Commissioner
Administrative Data Division
National Center for Education Statistics
U.S. Department of Education

Seth Galanter
Principal Deputy Assistant Secretary
Office for Civil Rights
U.S. Department of Education

Sanametrix and the American Institutes for Research are conducting this study for the National Center for Education Statistics (NCES) of the U.S. Department of Education. This study is authorized by law under the Education Sciences Reform Act (ESRA, 20 U.S.C. §9543). Your participation is voluntary.