

NATIONAL CENTER FOR EDUCATION STATISTICS

Volume I

Supporting Statement

*2013-14 Civil Rights Data Collection (CRDC)
Improvement Study
Pilot Test*

OMB# 1850-0803 v.110

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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 obligation of the nation's public school districts and elementary and secondary schools to provide equal education opportunity to their students. To fulfill this goal, the CRDC collects a variety of information, including data on student enrollment and education programs and services 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 (with flat file submissions and paper surveys 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 (OMB# 1870-0504).

Feedback from prior CRDC administrations indicates that some LEAs experience difficulty responding to the CRDC. The documented issues 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 of the data collected as part of the CRDC, especially the data 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 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 first sought 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, problems they face in meeting the CRDC request for information, and comprehension of the data elements and definitions. Understanding of these areas will help us develop tools and procedures that better facilitate reporting and improve data quality. To research these issues, we conducted a process improvement and feasibility study that consisted of in-person site visits with schools, LEAs, SEAs, and OCR regional offices, and in-depth cognitive interviews with staff at 20 LEAs.

Based on this information, we have revised instructions for CRDC data and developed a new online tool that will be used in the 2013-14 data collection. This request for clearance is to pilot test this new tool with 40 to 50 LEAs. The supporting documents listed below provide the final materials and example screen shots of the new tool that will be used in the 2014 CRDC Pilot Test.

Supporting Documents in this Submission

Findings and recommendations from the site visits to schools, LEAs, and SEAs: The CRDC Improvement Project: Recommendation for the 2013-14 and 2015-15 Collections and Beyond (Final Draft)

- This report presents an overview of the main goals of the CRDC Improvement Project, a summary of the research tasks, a description of the challenges encountered by LEAs that contribute to the excessive response burden, comprehensive recommendations for achieving the project goals based on known issues and site visits, key challenges for implementing improvements, and a suggested timeline for improvement activities.

Findings and recommendations from cognitive interviews with LEAs and SEAs

- This report summarizes the feedback received from the cognitive interviews and provides recommendations based on this feedback. The methodology used for these interviews is described first, followed by the feedback and recommendations organized by the table layout in the CRDC School Form. The CRDC School Form used in the interviews is attached.

Revised 2013-14 CRDC questions prompts, instructions and reorganization to align with the manner in which LEAs collect, store, and report CRDC data

- This document provides the revised question structure and instructions text based on findings from the cognitive interviews. Definitions remain as approved by OMB for the 2013-14 CRDC.
- Also included are representative screen shots of how the question text will be displayed on the online data entry tool.

Revised 2013-14 Flat File Specifications

- This document provides instructions for LEAs in preparing csv files of CRDC data for submission.

Revised 2013-14 CRDC Data Element Specifications for Flat Files:

- This document provides the flat file specifications for each individual data element including its permitted values, length and required data element name.

3. Purpose

The pilot test will gather feedback from LEAs on the tool's usability and functionality. It will ensure that data integrity, skip patterns, validations, and all other key functionality of all modes of input—including flat file submissions—perform to the specifications in the requirements documentation. Feedback will be prioritized and used to make decisions about needed changes for the immediate 2013-14 collection and for future collections.

The pilot data will be used only to improve the online tool and data submission process. No pilot data will be published or used for any other purpose by the contractors, NCES, or OCR.

4. Design

The LEAs will be provided access to the system for their use for a two-week period. The pilot will be hosted on ED servers. The CRDC online tool contractors, Sanametrix and AIR, will be in communication with the pilot LEAs throughout the process, will provide them with a mechanism for reporting their suggestions using an online feedback tool, and will respond to questions. At least two pilot LEAs will be designated to test the flat file upload. LEAs using the flat file submission will be asked to report data for all their schools. However, to minimize burden in the pilot, LEAs entering data into the online tool will be asked to report data for 4 schools – one elementary school, one middle school, one high school, and one ungraded school. If an LEA does not have one of these types of schools, they will need to submit for only the types of schools they have.

Recruitment

Sites will be recruited by Sanametrix and AIR, in consultation with NCES. Depending on the contact information available, recruitment will be conducted by phone calls or emails to superintendents, CRDC points-of-contact, or other key personnel. Since not all sites recruited will be able to participate in the pilot due to scheduling conflicts, NCES anticipates contacting approximately 60 LEAs in order to recruit the target 40-50 LEAs. The recruitment process is expected to take 10-20 minutes per entity.

Individuals responsible for data collection and entry will be recruited from within each site. All recruitment communication will contain the following key information:

- Purpose of the study, including that the data will be used for testing purposes only,
- Study sponsorship,
- Voluntary nature of participation,
- Importance of participation, and
- Estimated burden.

Materials

The recruitment text to be sent or read to participants is provided in the attachments. The survey content has been approved by OMB in the 2013-14 clearance package for the main study (OMB# 1870-0504).

5. Consultations outside the Agency

The proposed design and content for CRDC 2013-14 and 2015-16 was sent out for public comment in the summer of 2013. Feedback on design and content is also provided by a CRDC working group maintained by OCR, 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. Additionally, in early 2014, NCES conducted 15 site visits and 20 cognitive interviews with LEAs, SEAs, and schools to gather information about the CRDC submission process and data collection procedures, data elements, and definitions.

6. Payments to Respondents

Respondents will not receive payments.

7. Assurance of Confidentiality

The study will not collect personal data about the respondents, therefore no confidentiality will be promised. Participation in the study is voluntary and the study recruitment phone calls and emails will notify the LEA of the study sponsorship and voluntary nature.

8. Estimate of Hour Burden

We expect each LEA to spend 8 hours over a period of two weeks responding to the pilot survey.

Entity Participating	Estimated Number of Respondents	Estimated Number of Responses	Estimated Burden Hours per LEA	Total Estimated Burden Time (hrs)
LEA Recruitment	60	60	0.333	20
LEA Pilot Test	50	50	8.000	400
Total	60	110	-	420

9. Estimate of Cost Burden

There is no direct cost to respondents.

10. Reporting Plans

The contractors will compile LEA suggestions and provide NCES with the compilation, annotated for levels of criticality and feasibility, along with an Excel file of the pilot data submitted by LEAs. Based on these results, NCES will identify content changes (e.g., text refinements) and any critical technical issues to address. The pilot data will be used solely to improve the online tool and data submission process.

11. Project Schedule

Recruitment will begin upon OMB's approval. The pilot data collection is expected to begin on August 29, 2014, and be completed by September 30, 2014.

Attachment A: Recruitment Materials

Email Text

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 education 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 will be willing to participate in a pilot test of the Department's new data collection tool. The test will be conducted from August 29 to September 12, 2014. 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 pilot, we will ask you to submit data for four schools in your district – an elementary school, a middle school, a high school, and an ungraded school. If you don't have one of these schools, then you only need to provide data for the schools you do have. If you will be submitting data as a flat file submission, then we will ask you to submit your flat file upload for all schools.

Your data will be used for testing purposes only. It will not be used or retained for any other purpose.

We expect it will take about 8 hours per LEA to complete the pilot. We will leave the submission window open for two weeks for data entry, and our data collection contractors, Sanametrix and AIR, will be available to answer any questions and provide help. You will also be able to leave feedback about the data collection tool. Participation is voluntary.

If you agree to participate, someone from NCES CRDC team will be in touch with you when the system is ready for submission. Additionally, 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, or CRDC, 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 to serve as the foundation for the new system. We are recruiting a diverse group of LEAs to pilot test the new CRDC data collection tool.

I am calling to ask your LEA to participate in this pilot test. Let me tell you about what's involved and answer any questions you may have.

The test will be conducted from August 29 to September 12, 2014. During this time, we will ask you to submit data for four schools in your district – an elementary school, a middle school, a high school, and an ungraded school. If you don't have one of these schools, then you only need to provide data for the schools you do have. If you will be submitting data as a flat file submission, then we will ask you to submit your flat file upload for all schools.

Your data will be used for testing purposes only. It will not be used or retained for any other purpose.

We expect it will take about 8 hours per LEA to complete the pilot. We will leave the submission window open for two weeks for data entry. Our data collection contractors, Sanametrix and AIR, will be available to answer any questions and provide help. You will also be able to leave feedback about the data collection tool. Participation is voluntary.

Do you have any questions?

[Pause]

Would you be willing to participate in the pilot?

[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, someone from the NCES CRDC team will let you know when the pilot is open.

[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.