

Memorandum

United States Department of Education
Institute of Education Sciences
National Center for Education Statistics

DATE: May 24, 2016

TO: Robert Sivinski, OMB

THROUGH: Kashka Kubzdela, OMB Liaison, NCES

FROM: Stephanie Miller, CRDC Project Officer, NCES

SUBJECT: 2015-16 Civil Rights Data Collection (CRDC) Research & Evaluation (1850-0803 v.158)
Responses to OMB Passback

This memorandum provides response to the OMB request for additional information regarding the CRDC Research & Evaluation general clearance request.

OMB Comment 1: What's the benefit of doing this through site visits rather than phone interviews?

Associated text (3. Purpose): For the site visits, we are first seeking to understand more about how compatible the new data collection tool and procedures were with 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 reporting.

NCES: By visiting sites, we are able to ask for and go through hard copy materials with on-site staff as examples of particular problems and discuss problems in more depth than over the phone or email. The most challenging data to report are those that are filled out in hard copy forms or narrative text. This information also typically has student names associated with it, and is difficult to acquire not on-site.

Additionally, site visits are important to building on-going relationships with districts—specifically their staff that are critical to reporting CRDC data—and to reinforce the importance of ensuring good data are reported in a timely manner.

OMB Comment 2: Why not use the current instruments? What are the differences between the current instruments and the 2013-2014 instruments? Describe any testing or development procedures for the current instruments.

Associated text (3. Purpose): Although the 2015-16 CRDC has been approved by OMB under OMB# 1870-0504, this study will use instruments and online tool from the concluded 2013-14 CRDC.

NCES: We apologize for the confusion. We revised the Volume I text to state: “The 2013-14 and 2015-16 CRDC survey instruments are nearly identical, and for the pilot test we will use the 2013-14 CRDC tool that was used in the last data collection and is already fully programmed (approved under OMB# 1870-0504)”.

OMB Comment 3: It's not clear how you would use so many different criteria to select such small samples.

Associated text (4. Design): The sites proposed for each of the phases will reflect a diverse set of districts (and also states in phase 1), selected based on the following criteria...

NCES: The criteria will assist with prioritizing the types of districts we would most like to hear from. Each district will fall into multiple criteria (e.g., large urban district with charter schools that certified late in 2013-14 and submitted using the online submission tool) and we will try to recruit districts so that each criterion will be covered by multiple districts, but we intend to recruit at least one district per criteria so that across all participating districts, we have information from at least one district under each criterion.

OMB Comment 4: Break this out by phase.

Associated text (9. Estimate of Cost Burden). There is no direct cost to respondents. The total cost of this research to the government, including planning, data collection, and reporting, is approximately \$410,000.

NCES: The cost breakdown is: Site Visits \$140,000; Cognitive Interviews \$90,000; Pilot \$100,000. We mistakenly included another task and meetings in the initial overall total. The overall total is approximately \$330,000.