

Justification for Submission under DOI Programmatic Clearance for Customer Satisfaction Surveys (OMB Control Number 1040-0001)

U.S. Department of the Interior Office of Policy Analysis (PPA)	PPA Tracking Number: (for PPA use only) CSS-4
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		Date Submitted to PPA:	
1.	Survey Title:	Parent Survey-Special Education	
2.	Bureau:	Bureau of Indian Education, Division of Performance and Accountability	

3.	<p>Abstract: The Parent Satisfaction Survey – Special Education is for parents of students with disabilities enrolled in Bureau of Indian Education (BIE) funded schools. The survey is designed to gather information about school interactions with the support of parents to better meet the educational needs of their students with disabilities. This twenty-five (25) question customer satisfaction survey (Developed by the National Center for Special Education Accountability Monitoring (NCSEAM) as part of a larger survey) has been statistically validated as sufficient to meet the required reporting to the Department of Education’s Office of Special Education Programs (OSEP).</p> <p>The survey referenced in this document will be used to respond to Indicator 8 of the State Performance Plan (SPP) as is required by the Office of Special Education (OSEP). Individuals with Disabilities Education Act (IDEA,) P.L. 108-446, requires the submission of specific data as a requisite to the receipt of Federal funding to support services for students with disabilities attending public schools and Bureau of Indian Education (BIE) schools. Indicator 8 of the SPP addresses parental involvement and requires reporting the percent of parents who indicate their child’s school facilitated parent involvement, which resulted in improved educational results for the child. The responses will help guide efforts to improve services and results for children and families.</p>
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4. Bureau/Office Point of Contact Information					
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5. Principal Investigator (PI) Information					
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6.	Name of Program or Office Conducting Survey: Division of Performance & Accountability				
7.	Description of Customers and Services Provided:				
	Customers: Parents of students with disabilities attending Bureau-funded schools.				
	Services: Special Education/IDEA compliance				
8.	Survey Dates for current SPP/APR reporting requirements		(mm/dd/yyyy)	to	(mm/dd/yyyy)
			03/14/2016	to	06/10/2016
9.	Type of Information Collection Instrument (Check ALL that Apply)				
	<input checked="" type="checkbox"/> Intercept	<input type="checkbox"/> Telephone	<input type="checkbox"/> Mail	<input checked="" type="checkbox"/> Web-based	<input type="checkbox"/> Focus Groups
	<input type="checkbox"/> Other	Explain:			

10. Survey Development:

(Who assisted in survey content development statistics? Was the survey pretested? How were improvements integrated? Which of the six topic areas will be addressed?)

This survey is a part of a larger survey that was developed by the National Center for Special Education Accountability Monitoring (NCSEAM) between 2002-2005. To develop that larger survey, stakeholder input was obtained from representatives across the nation; the group generated over 500 items that were submitted to an expert panel. A national validation study of the survey was done during which item responses were obtained in six states (NM, FL, NH, NJ, MS, GA). During the validation process parents of Native American students were included. NCSEAM maintains an item bank of calibrated items.

11. Survey Methodology:

(Use as much space as needed; if necessary include additional explanation on separate page).

Respondent Universe	All parents, guardians or primary caretakers of students with disabilities (students with an Individual Education Plan in place) who are attending BIE schools are potential responders to this survey. Each school will be requested to work with all parents in this category with students attending their school for completion of the survey.
Sampling Plan/Procedure	<p>This survey will be a census survey. Opportunities will be provided for all parents of students with disabilities attending BIE schools to respond to the parent satisfaction survey. The list of individuals to be contacted by the schools will be generated by school staff employees with approved access to the demographic data for students with disabilities who have a current IEP utilizing the Native American Student Information System (NASIS), the BIE secured access internet portal.</p> <p>The data collection process could involve face-to-face assistance via a school parent liaison and/or electronically via the NASIS parent portal survey tool for parents who have been granted school level access to their child(s) NASIS Parent Portal. For parents without access to electronic media, a paper-copy version of the survey will be provided. Parents may be given the opportunity to respond when they come to the school for any reason, i.e., registration, IEP meetings, to check students out of dorms, parent nights, and so forth. For parents not reached in this manner, home visits will be made.</p> <p>BIE-DPA will produce a Special Education Parent Survey letter that will provide information to parents about the survey (explanations for the need of parent program information collection), methods to collect parent survey (NASIS parent portal and paper-copy), an offering of school and DPA level assistance to parents in completing the parent survey, due dates for information collection). BIE-DPA will distribute the Special Education Parent Survey letter to schools for distribution to the homes of all parents of students with disabilities of the school.</p>
Instrument Administration	The manners of administration will be face-to-face intercept and the BIE's NASIS secured access internet portal. Each school will be requested to work with the parents of students with disabilities to provide access to, and completion of, the survey. Interpreters will be available to orally interpret any part or all of the survey in a language the parents understand for both face-to-face and NASIS completed surveys. This process was used in the development of the survey and analysis showed no response pattern difference between Native American and other minorities and white response patterns.
Expected Response	There are approximately 7,000 students with disabilities (SWD)

<p>Rate and Confidence Levels</p>	<p>receiving their education in BIE funded schools at any given time. It is anticipated that 60% will participate in the survey. Recent collection history using only face-to-face collection has demonstrated the following response rates FY2013: 50.91%, FY2012: 57.43%, and FY 2011: 52.17%. With the face-to-face and electronic (via the NASIS parent portal survey tool) options for parents to complete the survey, higher response rates than the recent past are expected. This is based on several factors. Feedback from the schools on the method (electronic submission) and instrument (NASIS) being utilized to administer the data collection has been positive. Most schools have previously provided access to the NASIS Parent Portal for all parents with students of the school. This is the means many of the schools utilize to communicate information to parents: their child's grade, assignments, school announcements. Some schools are utilizing the NASIS parent portal survey tool to gather information from parents for school improvement.</p>	
<p>Strategies for dealing with potential non-response bias</p>	<p>With face-to-face intercept and internet portal survey models, and the ability to translate for individual parents, a 60% response rate is expected. The face-to-face intercept model will be supported by home visits made by Home School Liaison personnel at each school. The internet portal survey model can utilize the bulletin board in NASIS to provide reminders to parents to complete the survey and provide reminders of due dates. Each school will develop a follow up plan for non-response to keep non-response bias as low as possible.</p> <p>This is a survey that will include, by individual school, a potential pool of responses ranging from an 'n' of one (1) to an 'n' of 160. It is anticipated there will be a varied level of survey completion by school. All responses will be collated to provide system-wide data for state reporting (OSEP). Limitations to school level reporting will be identified if data is not reliable due to the 'n' size. Individual school reports will not be made if the 'n' is too small to infer valid results or if the 'n' is so small as to allow individual student/parent identification.</p> <p>Demographic information data (age/grade/race/disability), will be suppressed if representation of the group is so small within the population that it could provide individual student/parent information.</p>	
<p>Description of any pre-testing and peer review of the methods and/or instrument (recommended)</p>	<p>BIE-DPA proposes to utilize the NASIS parent portal survey tool and/or paper-copy form for the collection of parent data. BIE school administrative staffs can identify and provide access to parents of students with disabilities that need access to the survey and to NASIS. Several BIE funded schools and the NASIS program staffs have the ability to, and do on occasion, collect parent input for education program improvement utilizing the NASIS parent portal survey tool. The NASIS parent portal survey tool has been through extensive testing and troubleshooting by Infinite Campus, the program developer, prior to respondent usage.</p> <p>The BIE has utilized the NCSEAM paper-copy form of the survey for collection for the past eight years. BIE intends to provide the content from the paper-copy form to the NASIS electronic survey tool.</p>	
<p>12.</p>	<p>Total Number of Initial Contacts and Expected Number of Respondents</p>	<p>7,000 contacts / 4,200 respondents</p>
<p>13.</p>	<p>Estimated Time to Complete Initial Contact and Time to Complete</p>	<p>5 minutes contact 15 minutes to complete instrument</p>

	Instrument	
14.	Total Burden Hours Contacts Respondents ----- Total	$[(7,000 \times 5) + (4,200 \times 15)] / 60 = 1,633.3 \text{ hours}$
<p>15. Reporting Plan: Data and analysis of that data will be used to report in the BIE APR to OSEP, on a yearly basis. The information will also be provided to each school so they may review the information with the school community, including parents that participated in the survey. Information will be used to improve parent involvement in the educational programming for their children with disabilities. Records will be maintained at BIE/DPA. Copies of all reports will be forwarded to the Office of Policy Analysis, upon request.</p>		
<p>16. Justification, Purpose, and Use:</p>		
Survey Justification and Purpose	<p>The survey referenced in this document will be used to respond to Indicator 8 of the State Performance Plan (SPP) as is required by the Office of Special Education (OSEP). PL 108-446 Individuals with Disabilities Education Act (IDEA) requires the submission of specific data as a requisite to the receipt of federal funding to support services for students with disabilities attending public schools and BIE schools. Indicator 8 of the SPP addresses parental involvement and requires reporting the percent of parents who indicate their child's school facilitated parent involvement which resulted in improved educational results for the child.</p>	
Survey Goals	<p>The survey goal is to have a parent reported indicator of the percent of parents responding in a manner which indicate that the school involved them in their child's education planning and this improved results for their child.</p>	
Utility to Managers	<p>The utility to BIE/DPA will be at several levels. At the Central Office level the data gathered will be used a) to report as required on this issue to OSEP, b) to better understand the issue of parent involvement in the schools, parent satisfaction levels, opportunities for improving services and plan future system-wide activities to address the issue if needed, and c) to understand which Bureau funded schools are doing a good job with the parental involvement issue and which schools would benefit from technical assistance and support. At the school level a) there will a better understand how the parents of students with disabilities believe their school is involving them in a meaningful way in the educational planning for their child, b) parents will have been given the opportunity to provide input to the school, and c) the school can address areas identified as a need by the surveys completed at the school. Managers in both instances described above would be the education administrators.</p>	
How will the results of the survey be analyzed and used?	<p>The surveys will be completed utilizing the NASIS Parent Portal survey tool or by paper-copy forms. The scoring and analysis will be conducted by BIE-DPA staff. The survey in question was developed by a national center with an OSEP provided grant, the purpose of which was to systematically gather a set of data relative to parents of students with disabilities across the United States. In that development of the survey protocols for analysis were also developed. In order to maintain consistency and validity of the survey, use of the same process from data</p>	

	<p>gathering to data analysis, is important.</p> <p>Use of the NCSEAM instruments to address the parent/family indicators requires the determination of a standard. For Part B, the standard is defined as the measure at which there is adequate evidence of a schools' facilitation of parent involvement.</p> <p>In July 2005, NCSEAM convened a national group of stakeholders including parents, and state Part B directors, advocates, service providers, and researchers, to recommend standards for the Part B indicators. Their recommendations are reported in the NCSEAM Summer Institute Plenary Session presentation.</p> <p>Procedure The standard setting process implemented by NCSEAM was a modification of the process described in Stone, G>E> (2001). Objective Standard Setting (or Truth in Advertising), Journal of Applied Measurement, 2(2), 187-201.</p> <ul style="list-style-type: none"> • Convene a workgroup with broad representation of families, state and local agencies, advocates, and other key stakeholders. • Distribute a list of all items constituting the scale for which a standard is to be set. The items should be in their calibration order from lowest (greatest amount of agreement) to highest (lowest amount of agreement). The items will have been scaled such that the item calibrations represent a combined .95 likelihood of a response across the three agree categories (agree, strongly agree, very strongly agree). • Reach consensus as to the highest item with which participants would require an "agree" response in order to have confidence that the meaning of the indicator (e.g., schools are facilitating parent involvement) is being achieved. Descriptively, "If families don't agree with this item" – and, by implication, with all those below it – "then we could not say that we had acceptable quality in this area." • The measure that corresponds to the selected item – or items, when several items are in the same statistical range - represents the standard. • Performance on the indicator is calculated as the percent of parents or families with measures at or above the established standard. • To take measurement error into consideration, construct a confidence interval around the percent based on the estimate of measurement error. We will then have 95% confidence that the true percent of parents at or above the measure is within this % interval.
<p>How will the data be tabulated? What Statistical Techniques will be used to generalize the results to the entire customer population? How will limitations on use of data be handled? If the survey results in a lower than</p>	<p>Data will be collected and tabulated electronically for both the NASIS parent portal survey and the paper-copy survey. BIE-DPA, with the assistance of the IDEA Data Center staff, will conduct the scoring and analysis of the data collection. Acceptable statistical methodology will be used. Limitations in the data generated by the survey will be addressed in the analysis. Limitations will be recognized and identified as to the source of the limitations so that planning for subsequent survey</p>

<p>anticipated response rate, how will you address this when reporting the results?</p>	<p>collections can address the limitations in a manner determined by the nature of the limitation. If a single school has a low response rate BIE will request the school to do face-to face follow up. If there are lower numbers due to the school not making a strong effort to contact each parent they will be asked to do home visits as a follow up. If a parent has been properly given the opportunity to respond and chooses to not do so that will be recorded. When BIE is unable to achieve desired responses from parents, the reporting will identify schools in which there was less than 60% participation so results can be interpreted accordingly. Example: If all schools except those on Hopi get a response rate of at least 60% the report will include as a limitation that the general conclusions may not apply to Hopi. If there is a lower than desired response rate overall for one or more items these will be identified in the report and if statistically warranted, will be identified as a limitation in results that must be taken into account in interpretation of the resultant data.</p>
<p>Is this survey intended to measure a Government Performance and Results Act (GPRA) performance measure? If so, please include an excerpt from the appropriate document.</p>	<p>This survey is intended to measure an SPP indicator for reporting to OSEP. See indicator as follows: (The indicator is taken directly from the OSEP SPP guidance.)</p> <p>State Performance Plan / Annual Performance Report</p> <p>Indicator 8: Percent of parents with a child receiving special education services who report that schools facilitated parent involvement as a means of improving services and results for children with disabilities. (20 U.S.C. 1416(a)(3)(A))</p> <p>Measurement: Percent = [(number of respondent parents who report schools facilitated parent involvement as a means of improving services and results for children with disabilities) divided by the (total # of respondent parents of children with disabilities)] times 100.</p>

CERTIFICATION FORM FOR SUBMISSION UNDER OMB CONTROL NUMBER 1040-0001

This form should only be used if you are submitting a collection of information for approval under the DOI Programmatic Clearance for Customer Satisfaction Surveys. If the collection does not satisfy the requirements of the Programmatic Clearance, you should follow the regular PRA clearance procedures described in 5 CFR 1320.

Bureau/Office Subgroup or Program: Bureau of Indian Education			
Title (Please be specific): Parent Survey-Special Education			
Estimated Number Contacts Respondents	7,000 contacts 4,200 respondents	Time per Response Contacts Respondents	Contact 5 minutes Respondent 15 minutes
		Total Burden Hours Contacts Respondents ----- Total	$[(7000 \times 5) + (4200 \times 15)] / 60 = 1633.3$ hours
Bureau/Office Contact (who can best answer questions about content of the submission):			
Name	Don Griffin	Phone	(505)563-5384
Certification: The collection of information requested by this submission meets the requirements of OMB control number 1040-0001			
Bureau/Office Qualified Statistician			DATE
Peter Grigelis			
Bureau/Office Information Collection Clearance Officer			DATE
Ashley Fry			
Office of Policy Analysis			DATE
Ben Simon			