MEMORANDUM

UNITED STATES DEPARTMENT OF EDUCATION

INSTITUTE OF EDUCATION SCIENCES

National Center for Education Statistics

DATE: March 19, 2015

TO: Shelly Martinez, OMB

THROUGH: Kashka Kubzdela, NCES data collection clearance coordinator

FROM: Christopher Chapman, Associate Commissioner of Sample Surveys Division, NCES

SUBJECT: Office of Management and Budget terms of clearance for Private School Survey (OMB#

1850-0641 v.5)

On June 24, 2013, the Office of Management and Budget (OMB) issued a Notice of Office of Management and Budget Action (NOA) clearing the National Center for Education Statistics (NCES) to continue work needed for the every-other-year collection of the Private School Survey (PSS). The NOA included terms of clearance to explore the possibility of expanding PSS to collect data on private preschool providers.

Options for collecting data for this population were subsequently discussed in meetings in the fall of 2013 and again in early 2014. Participants in these meetings included senior staff from OMB; NCES; the U.S. Department of Education's Office of Early Learning, the Office of Planning, Evaluation and Policy Development, the National Center for Special Education Research, and the Budget Service; the U.S. Department of Health and Human Services Administration for Children and Families; and researchers from the State of Preschool Study. Discussions about preschool integration into PSS indicated that this would not be an efficient approach to collect needed information about the preschool provider population in the United States. Related discussions indicated that expanding other existing federal data collections would also not efficiently capture information about these providers. The discussions followed the structure of the summary provided below.

Preschool providers are a difficult population to study. The primary reason for the difficulty is that the providers have diverse sources of support (public, private, and mixed) and come into and go out of existence at high frequencies. Both traits make efficient universal frame development difficult. The challenge can be illustrated by a review of existing collections that gather data on providers. Currently, preschools that are run through public school systems are captured through the Common Core of Data (CCD). However, CCD cannot capture information on all publicly provided preschools because many publicly supported preschools are not managed by public school systems. For example, Head Start programs are ubiquitous, but are not systematically managed by school systems. Data are available for Head Start centers, but these do not fill in information about all public providers missed by CCD. Many other publicly supported preschool programs are managed outside of both school systems and Head Start.

Expanding PSS to include private preschool providers could significantly improve information about nonpublic providers. However, the expansion would be expensive if including providers not attached to schools with at least a kindergarten as a low grade was considered. This would be equivalent to expanding CCD to collect data on all public providers irrespective of whether the providers were managed by school systems, and would fundamentally change the PSS collections. To clarify what the effect of the expansion

might be, the National Survey of Early Care and Education (NSECE) estimates that there are 130,000 preschool providers (http://www.acf.hhs.gov/sites/default/files/opre/characteristics of cb fact sheet final 111014.pdf). This matches the number of existing public and private schools indicating that expanding CCD and PSS to integrate preschools would effectively double the operational work for these studies.

An alternative approach could be similar to that pursued by U.S. Department of Health & Human Services' Administration for Children and Families (ACF) with the NSECE. The study provided considerable nationally representative information about preschool providers using area sampling approaches to identify representative samples of providers. The advantage of the NSECE approach over expansion of CCD and PSS is that it provides national information without the high expense of full census collections. Additionally, the NSECE collected data using common forms with comparable items that focused on issues integral to preschool provision, thereby helping to avoid potential duplication issues associated with providers funded by public and private sources.

NCES proposes to convene meetings with OMB and ACF to determine what data would be most useful to have available on a regular basis, and resources needed to collect and report these data.