SUPPORTING STATEMENT
U.S. Department of Commerce
U.S. Census Bureau
Current Population Survey (CPS) October School Enrollment Supplement
Office of Management and Budget (OMB) Control No. 0607 - 0464

#### A. JUSTIFICATION

# 1. Circumstances Making the Collection of Information Necessary

The School Enrollment Supplement is jointly sponsored by the U.S. Census Bureau, the Bureau of Labor Statistics (BLS), and the National Center for Education Statistics (NCES). Collected in October each year as a supplement to the Current Population Survey (CPS), these data provide basic information on the school enrollment status of various segments of the population necessary as background for policy formulation and implementation. This supplement is the only annual source of data on public/private elementary and secondary school enrollment, as well as the characteristics of private school students and their families.

As part of the Federal Government's efforts to collect data and provide timely information to government entities for policymaking decisions, this supplement provides national trends in enrollment and progress in school. The basic school enrollment questions have been collected annually in the CPS for more than 50 years. Consequently, this supplement is the only source of historical data at the national level on the age distribution and family characteristics of college students, and on the demographic characteristics of preprimary school enrollment. Discontinuance of these data would disrupt a data series that has reliably and consistently informed Federal, state and local governments, and program and policy makers on the state of education in our nation for half of a century.

Title 13 U.S.C. Sections 8(b), 141, 182, and Title 29, U.S.C. Sections 1-9 authorize the collection of this information on individuals and households. Title 20 U.S.C. Sections 3475, 9543, 9544, and 9546 authorize the National Center for Education Statistics to collect this information.

The CPS advance letter presently in use (Attachment B) is generic for all CPS collections, and although the legal authorities cited within the letter do not match those in this statement, the Census Bureau has plans to revise the letter, whereby the authorities will match those given above.

# 2. Purpose and Use of Information Collection

The purpose and use of specific data items collected in the October School Enrollment Supplement to CPS are noted below. The proposed questions are in Attachment A.

a. Items for Adults on Basic School Enrollment (See Items SSCHOL, PUBLIC, and GRADE in Attachment A)

Institutions responsible for the education of preprimary, elementary, secondary, college, and vocational students use the basic school enrollment data collected in the October supplement. These institutions include federal agencies; state, county, and city governments; and private organizations. Employers and analysts who need current information on the educational characteristics of the population to anticipate the composition of the labor force in the future also use these data. As part of its mission as the primary collector and distributor of data on the American work force, the BLS publishes a wide array of data about school-age youth. Since 1959, the BLS has relied on the October supplement to the CPS to supply labor force data on youths by their school enrollment status. This single statistical series includes historical trends on the hours worked, occupations held, and unemployment rates of youths by whether they are full-or part-time students, recent high school graduates or dropouts, or attending any type of vocational school.

Although we obtain current enrollment status for 16 to 24 year-olds monthly in the CPS basic program, the BLS and the Census Bureau are still dependent on the CPS October supplement questions to obtain recency of high school graduation or dropping out to analyze the impact of these events on the labor force participation of young adults.

b. Items for Children on Basic School Enrollment (See Items SCH35, SCH614, CHPUB, and CHGRDE in Attachment A).

The October supplement has included the items that concern nursery and kindergarten enrollment of 3- and 4-year-old children since 1967. These questions are designed to measure differences between social and economic groups in the extent to which young children are exposed to nursery school and kindergarten experiences before entrance into regular school. The BLS uses these data in comparing labor force status of mothers with young children enrolled and not enrolled. Enrollment rates in public and private schools by demographic characteristics, such as income, provide policy-relevant information on access to public and private schools.

c. Items on Higher Education (See Items FULL, STYPE, VOCA, and LASTYR in Attachment A).

In addition to providing data on school-age children and young adults, this supplement provides a total aggregation of all people enrolled in or recently graduated from high school and enrolled in college or vocational school. The basic school enrollment data also show the total number of adults returning to school to complete high school or to obtain post-secondary education. The school enrollment data for adults of all ages are essential in understanding both changes in the "quality" of the labor force and the "health" of higher education.

d. Items on School Completion and Dropouts (See Items LASTGD, YRATT, YRDEG, YRDIP, GED(1-3), S56, and S57 in Attachment A).

Labor force participation data for all students, by current enrollment status, and for dropouts and graduates provide necessary measures of economic well-being. This supplement provides the only annual data on enrollment status or date of school completion and labor force status by personal and family characteristics. It also provides general-purpose enrollment data for the entire population and is used extensively by the Office of Planning and Budget of the Department of Education.

The estimate of high school dropout rates and characteristics obtained from this survey will enable the NCES to comply with its legislative mandate to collect and report information on the condition of education in the United States.

# 3. Use of Improved Information Technology and Burden Reduction

Since January 1994, the Census Bureau has collected the CPS data using computer-assisted interviewing. Interviewing may take place in person or by telephone using a computer-assisted questionnaire. We designed the supplemental questions to obtain the required information on school enrollment from survey respondents as efficiently as possible and with minimal respondent burden. Question paths are automatically built into the instrument to ensure that interviewers ask the appropriate set of questions based on the composition of the respondent's household and responses to prior questions. This approach minimizes the need to ask respondents questions that do not apply to their household. The proposed items and interviewer procedures have been developed over years of consultation among the Census Bureau, the BLS, and other government agencies. The use of computer-assisted personal and telephone interviewing is determined to be the most appropriate collection methodology for this collection given information technology currently available.

#### 4. Efforts to Identify Duplication

The basic school enrollment questions have been collected annually in the CPS for more than 50 years. The Census Bureau has consulted with other government agencies, such as the Department of Education, NCES, and BLS, and has determined that the CPS October supplement is the only source of historical data at the national level on school enrollment by demographic characteristics. Government agencies and private firms have relied upon this series for decades as the main source of national school enrollment data.

A number of questions in this supplement may appear in the American Community Survey (ACS) and in other demographic surveys. However, this supplement's comprehensive set of questions does not duplicate any other single information collection, and ensures the historical continuity of a data series.

The CPS October supplement is a yearly source of annual data on enrollment in all schools by demographic, social, and economic characteristics. There are no comparable data that can be replicated, substituted, or modified to address the needs described in Item 2 above. Surveys such as the Survey of Income and Program Participation (SIPP), ask some education questions on a regular basis, but they do not collect the same set of information across all age groups that the CPS does.

This supplement to the CPS is the historical source of annual enrollment data for children 3 through 14 years old, which includes children in preprimary and elementary school. Progress in school (modal grade) by student and family characteristics, such as ethnicity, was used in evaluation of trends toward equality in schooling. The CPS has provided important data for the debate over federal support for private education in terms of the population affected and cost to the government.

Other surveys obtain, or will obtain, data on subpopulations of the CPS sample. Except for the ACS, these surveys often use smaller samples.

- a. The SIPP includes school enrollment items for people 15 years old and over in the core items. It includes items on enrollment in high school, college, or vocational school; year of enrollment; full-time status; and financial aid. The SIPP only includes a small portion of the items that are in the CPS. It does not obtain detail on college and vocational enrollment but does include questions on financial aid that may be used in combination with detailed household income data, not available in the CPS October 2015 Supplement.
- b. The Integrated Postsecondary Education Data System Survey of the Department

of Education provides administrative data on numbers of students for the universe of postsecondary schools (biennially by race and age). This data source does not provide any social or economic data on students or any data for comparison with nonstudents.

c. The Schools and Staffing Survey (SASS), conducted by the Census Bureau for the NCES, provides data on school districts, school administrators, and school teachers in public, private elementary, and secondary schools across the country. This survey

has little or no overlap with the CPS.

Each of the above surveys except the SASS can include a portion of the CPS data for different populations at different times. Analysts cannot aggregate the data from these surveys to get a complete enrollment picture at a common point in time. Definitions are not consistent, and the amount of detail varies. The CPS provides comparable measures of enrollment in all levels of school so that analysts can trace year-to-year progression in school.

We can collect preprimary enrollment data only in a large household survey, since the eligible population is small and a large sample is necessary to obtain reasonable data. Also, most preprimary schools are not part of regular public school systems and do not provide administrative data. This is one of the changing areas of education, as the proportion of children involved in preprimary education has risen in the past two decades and as some full-day preprimary enrollment has become enmeshed in the issue of day care for children of working mothers.

Analysts can calculate high school dropout rates by grade, gender, and race from the CPS, as well as enrollment and employment status of recent high school graduates. Although the SIPP can provide similar data, the sample is significantly smaller. Comparisons of race groups or grades, which are of concern on the federal and local levels, may be impossible. The Department of Education uses the CPS data as a critical component of their congressionally mandated annual study "Dropout Rates in the United States."

Analysts widely use enrollment data for adults from the CPS for small population groups. Recently, college enrollment of young high school graduates by race has been widely discussed, as the college enrollment rate of young Black or African American high school graduates has not increased as much as for young Whites. Because of the sample size difference, differences between the estimates by race are more difficult to detect with the SIPP. The changes in enrollment rates of young Black or African Americans could not have been detected in the SIPP as the difference would not have been statistically significant. The confidence intervals on education data in the SIPP are about two-thirds larger than similar estimates in the CPS.

Type of school for college students is not available in the SIPP. Although the SIPP will be useful in tracking educational transitions, the sample size of the CPS is crucial in making annual cross-sectional data useful.

Although the SIPP and the CPS have a few enrollment items in common, the surveys do not duplicate each other. The SIPP school enrollment items relate to receipt of certain types of income and participation in government programs by adults. Enrollment data are not the focus of the survey but provide supporting data as do the demographic characteristics of respondents. They elaborate on the economic status of the population as related to the focus of the survey. The SIPP does not provide the depth of data necessary for analysis of enrollment in postsecondary school. It provides limited information on secondary school and nothing on elementary school.

#### 5. Efforts to Minimize Burden on Small Business

The collection of school enrollment information does not involve small businesses or other small entities.

We designed the supplemental questions to obtain the required information with minimal respondent burden. The proposed items and interviewer procedures have been developed over the years as a result of consultation between the Census Bureau, the BLS, and other government agencies. Further, there are no legal issues that influence respondent burden.

#### 6. Consequences of Less Frequent Collection

We must collect the school enrollment data annually in order to track trends in enrollment at all levels. Shifts in trends affect educational institutions and the bodies governing them in several areas such as government expenditures, employment patterns of youth, and labor force demands within the teaching profession. Planning for areas such as these requires accurate and current data. These data are part of the Department of Education's Annual Report to Congress on the Condition of Education.

# 7. Consistency with Office of Management and Budget (OMB) Guidelines

These data will be collected in a manner consistent with the OMB guidelines.

#### 8. Consultations Outside the Agency/Comments in Response to the Federal Register

Over the past year, we have consulted the following people concerning the development of the supplement:

Christopher Chapman National Center for Education Statistics U.S. Bureau of Labor Statistics 202-502-7414

Dorinda Allard 202-691-6471

In addition, a statement soliciting comments for improving the CPS data is prominently placed in all the Census Bureau publications that cite the CPS data. We include a similar statement in the technical documentation that accompanies the microdata files.

We published a notice of our intent to ask the school enrollment questions in the April 21, 2015 edition of the Federal Register (see Vol. 80, No.76 pg 22163). We received no comments. The CPS advance letter (see Attachment B) provides respondents with an address at the Census Bureau to which they can submit general comments on the survey and specifically those comments regarding respondent burden.

#### **Explanation of any Payment/Gift to Respondents** 9.

The Census Bureau does not make any payments or provide any gifts to individuals participating in the CPS and its monthly supplements.

#### **10.** Assurance of Confidentiality Provided to Respondents

The Census Bureau will comply with the Privacy Act of 1974 and the OMB Circular A-130 requirement in terms of notification to the respondent. Each sample household receives an advance letter approximately one week before the start of the CPS initial interview (see Attachment B). The letter includes the information required by the Privacy Act of 1974, explains the voluntary nature of the survey, and states the estimated time required for participating in the survey. Interviewers must ask if the respondent received the letter and, if not, provide a copy and allow the respondent sufficient time to read the contents. Also, interviewers provide households with the pamphlet, The U.S. Census Bureau Respects Your Privacy and Protects Your Personal *Information*, which further states the confidentiality assurances associated with this data collection effort and the Census Bureau's past performance in assuring confidentiality (see Attachment C).

All information given by respondents to Census Bureau employees is held in strict confidence under Title 13, United States Code, Section 9. Each Census Bureau employee has taken an oath to protect the confidentiality of respondents' data and is subject to a jail penalty and/or substantial fine if he/she discloses any information given to him/her.

#### 11. Justification for Sensitive Questions

The CPS October supplement does not include any questions of a sensitive nature.

# 12. Respondent Burden

There will be approximately 59,000 households selected for interview, with one respondent per household. Each interview takes approximately three minutes; therefore, the total estimated respondent burden for the CPS October 2015 supplement is 2,950 hours for fiscal year 2016. We base these estimates on previously conducted October school enrollment supplements. The actual interview time is dependent upon the size of the household and the educational characteristics of the household members.

# 13. Other Costs to Respondents

There are no costs to the respondents other than that of their time to respond.

#### 14. Cost to Federal Government

The estimated cost of the School Enrollment Supplement is \$200,000, and is borne by the Census Bureau, BLS and NCES for the fiscal year.

# 15. Reason for Change in Burden

There is no change in burden since the previous request for clearance.

# 16. Time Schedule, Analysis, and Publication Date

We will conduct the CPS, of which this supplement is a part, during the week of October 18-25, 2015. We expect to produce the basic school enrollment tabulations by March 2016. We plan to publish a final report by October 2016.

### 17. Displaying the OMB Expiration Date

The October School Enrollment Supplement is administered as part of the CPS monthly interview. However, the supplement (as well as all the CPS supplements) bears an OMB control number and expiration date different from the basic CPS interview. The OMB control number and expiration date for the CPS basic interview is included in the advance letter we give respondents (see Attachment B). Because of respondent confusion involved with communicating a separate control number and expiration date to CPS respondents for the supplement questions, we wish to follow

the established precedent agreed to with OMB, and not display the OMB control number and expiration date for the supplement.

# 18. Exceptions to the Certification

There are no exceptions to the certification.