



June 21<sup>st</sup>, 2013

# MEMORANDUM

**To:** Shelly Martinez, OMB  
**Through:** Kashka Kubzdela, NCES  
**From:** Stephen Broughman, NCES  
**Subject:** Responses to OMB Passback (received on 6-10-2013) for the 2013-14 and 2015-16 Private School Universe Survey (PSS) Clearance Package (OMB# 1850-0641 v.5)

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1. The burden estimates found in ROCIS and in SS A12 do not match. Please reconcile and correct whichever is incorrect. This includes the “annual cost burden,” which is currently listed at \$0 in ROCIS.

Per our email communications with OMB and the U.S. Department of Education’s (ED) Office of Management (OM), between June 10th and 11th, ED reports the highest annual # for the Generic ICRs such as the NAEP, but for most non-generic/other ICRs, ED reports an annual average. Since PSS is a biennial ICR, the average annual burden is less than in the years when PSS is administered. ROCIS asks for annual burden, and it would be helpful for ROCIS to add Year 1, 2 and 3 burden fields, at least for surveys, to show the more accurate yearly burden counts instead of the annual average. In the case of PSS, we reported the annual average, but the Supporting Statement Part A breaks provides the yearly estimated burden for the public to see. We can report the highest burden year if requested, but it will show a higher than actual overall burden for this collection.

For the annual costs, ED has very few ICRs where costs are reported in the ROCIS field, in which ED reports only the A13 costs, which for PSS are \$0. We would like to remain consistent with ED’s reporting for all ICRs.

2. Why does this collection exclude pre-K from its universe? Is NCES planning to revisit this exclusion soon?

Including pre-K in the universe would present a serious challenge. NCES would have to devise a new system of list building to capture pre-Ks to have adequate coverage. NCES experimented in the 1995-96 PSS with getting some pre-k lists from states – the lists we received were very extensive and very difficult to work with. One of the problems was that it was hard to identify pre-k programs on the lists due to the large variation in terminology used to describe these programs.

By expanding the definition of a “school” to include pre-k, NCES would probably likely more than double the number of school in the PSS collection. This and the additional list building would significantly increase the cost of the PSS. NCES would also have to devise a way to get what we would consider pre-Ks to self-identify themselves on the questionnaire.

Due to the recent policy focus on early childhood education, NCES staff have been discussing early education information collections and the NCES Commissioner is planning to form a committee for pre-k through 12 grade issues such as the one brought up by OMB.

3. Given the policy import and attention to pre-K, why doesn’t NCES at least separate out pre-K as its own category from preschool and other similar categories in questions 2a(1) and 5b?

We suspect OMB meant questions 2b (1). This portion of the questionnaire serves as the screener and is designed to identify in-scope schools; having a pre-k does not make a school eligible for the PSS currently.

With regards to question 5b (revised to # 4b), the Nursery and prekindergarten grade levels were added to item 5 (revised to # 4) to give respondents a category to report their preschool students rather than having them stick

them in some other category. Given the current eligibility requirement for the PSS, NCES would not be able to generate pre-k program or student estimates if a separate pre-k category was added. As above, NCES would have to devise a way to get programs with what we would consider pre-Ks students to self-identify those students. This will be one of the issues evaluated by the Commissioner's P-12 grade topics committee.

4. Please provide more information about the Internet response option offered to schools and how schools would know about it. Is there an advance letter or cover letter to the mail questionnaire? The "letter" inside the questionnaire does not mention the Internet response option.

We inadvertently omitted to include in the initial submission materials the advance letter that will be sent to private schools prior to the questionnaire. It has been added to Appendix C.

5. Please clarify the percent of responses received by Internet in the last administration and the percent estimates for the next cycle (SS B3 says "the majority").

We have amended Pat B.3 to state that in the 2011-12 administration of PSS, we received 18% of responses by internet and, as been the case for the past two decades, about 58% of responses by a self-administered mode (internet/mail). We expect a similar distribution of responses by mode in the 2013-14 and 2015-16 administrations of PSS.

6. Please justify when NCES needs to ask EVERY single respondent to track time expended to complete the form EVERY single administration. This seems unnecessarily burdensome. Absent a strong rationale, we suggest dropping those two questions this round since they were collected last round and the questionnaire is changing only modestly.

We have included these questions every year because the burden associated with them was minimal, but we have now removed these items (originally # 4 and # 19) from the 2013-14 questionnaire. Should we change the length of the questionnaire in the future, we will include these items again to evaluate the imposed burden.

7. What does a "major role" to support homeschooling mean? What does NCES know about the quality of responses to this question?

This question (originally item 13a, now revised to # 12a) is used primarily to identify homeschools and has been performing well. It is used in conjunction with total enrollment (originally item 6, now revised to # 5), total teachers (originally item 11, now revised to # 10), and the school being located in a private home (originally item 13b, now revised to # 12b) to screen off homeschooling families and "schools" that only assist home schoolers without providing instruction. Over the years, most "schools" that have checked yes to this item also checked that they are located in private homes, have zero teachers, and a handful of students. NCES does not report statistics on this variable, and uses it primarily as a screener question.

8. Is footnote 1 in SS A still correct (i.e., that it is unclear whether SASS/NTPS will include private schools)?

It appears that SASS/NTPS will include private school teacher and principal components, but not a private school component. The PSS burden hours were calculated assuming that the entire burden associated with the PSS items in 2015-16 would be included in the PSS burden hours. We have updated the footnote 1 in the Supporting Statement Part A.

9. Please describe how the 2015-2016 PSS may need to change in light of the ongoing SASS/NTPS redesign and what testing or other collections OMB might see related to the PSS over the next year or so in preparation.

The SASS private school items will probably be on the SASS/NTPS private school principal questionnaire. It is possible that we may need to add some of the SASS private school items to the PSS (for all or a sample of PSS cases). If any SASS items that are added to the PSS require testing, NCES will request clearance for that testing in a separate clearance. Similarly, if NCES decides to add items to the 2015-16 or future PSS, NCES will request to amend OMB clearance for PSS.