

Private School Universe Survey (PSS) June 2016 - May 2019

Supporting Statement Part A

OMB# 1850-0641 v.8

Submitted by

National Center for Education Statistics
U.S. Department of Education

February 2016

SUPPORTING STATEMENT
TABLE OF CONTENTS

A. JUSTIFICATION.....2

- A1. Importance of Information.....2
- A2. Purpose and Uses of the Data.....2
- A3. Appropriate Use of Information Technology.....3
- A4. Efforts to Identify Duplication.....3
- A5. Small Business or Entities.....3
- A6. Frequency of Data Collection.....3
- A7. Special Circumstances of Data Collection.....3
- A8. Consultations Outside the Agency.....3
- A9. Payment or Gifts to Respondents.....4
- A10. Assurance of Confidentiality.....4
- A11. Need for the Use of Sensitive Questions.....5
- A12. Estimates of Information Collection Burden.....5
- A13. Capital and Operating Costs to Respondents.....6
- A14. Estimates of Cost to the Federal Government.....6
- A15. Changes in Burden.....6
- A16. Publication Plans/Time Schedule.....6
- A17. Request Not to Display Expiration Date.....7
- A18. Exceptions to the Certifications.....7

- APPENDIX A. STATE LIST REQUEST LETTER**
- APPENDIX B. ASSOCIATION LIST REQUEST LETTER**
- APPENDIX C. SCHOOL COMMUNICATION MATERIALS**
- APPENDIX D. PSS QUESTIONNAIRE**
- APPENDIX E. EXAMPLES OF TABLE SHELLS**

A. JUSTIFICATION

This request is to conduct the 2017-18 Private School Universe Survey (PSS) data collection and the 2017-18 and 2019-20 PSS frame-development activities.

A1. Importance of Information

The National Center for Education Statistics (NCES), within the U.S. Department of Education, conducts PSS, a national survey of private elementary and secondary schools. The PSS is designed to collect biennial data on the total number of private schools, teachers, and students; and to create an NCES universe frame of private schools that serve as a sampling frame for NCES surveys. This survey is an ongoing project to improve NCES universe and sample data on private schools.

Since 1980, NCES has annually collected descriptive universe data on the number of public school teachers, students, and high school graduates through the NCES Common Core of Data (CCD) for the public schools. Private schools represent approximately 25 percent of all elementary and secondary schools in the United States and enroll an estimated 10 percent of the nation's elementary and secondary students. With increasing policy concern about choice and alternatives in education, the interest and need for data on private education has also increased. NCES has recognized this need to assure that the collection of data on private schools be comparable to public school data.

In 1989, NCES established an Interagency Agreement with the U.S. Census Bureau to collect and process private school data. The PSS was conducted in 1989-90, 1991-92, 1993-94, 1995-96, 1997-98, 1999-2000, 2001-02, 2003-04, 2005-06, 2007-08, 2009-10, 2011-12, and 2013-14, and those data have been published (<http://nces.ed.gov/surveys/pss/>). The 2015-16 PSS data are currently being collected and are scheduled to be released in April 2017. NCES is authorized to conduct this survey under the Education Sciences Reform Act of 2002 (ESRA: 20 U.S.C., § 9543).

A2. Purpose and Uses of the Data

NCES has conducted several national sample surveys of private elementary and secondary schools beginning in the 1970s. The Schools and Staffing Surveys (SASS) for 1987-88, 1990-91, 1993-94, 1999-2000, 2003-04, 2007-08, and 2011-12 provided estimates of the numbers and characteristics of private schools, teachers, and students for comparison among private schools and with public schools. The SASS has been replaced with the National Teacher and Principal Survey (NTPS). The 2015-16 NTPS did not contain private schools and at this point it is unclear whether the 2017-18 NTPS will contain private schools. Even with successive administrations of NTPS providing detailed trend data on a sample of private schools, there is a need for biennial universe data on a limited number of key statistics and a need to update the private school sampling frame for openings and closings of private schools every several years.

Except for previous PSS, the sampling frames available for private school surveys have not been timely nor have they provided complete coverage. Commercial lists, such as those developed by QED, are not complete and lack sufficient detail on school characteristics to select samples according to NCES specifications. Lists maintained by organizations of private schools are also incomplete because they only contain listings of their member schools. The purposes of this project are, therefore, to: collect biennial data on the total number of private schools, teachers, and students; and to create an NCES universe frame of private schools to serve as a sampling frame for NCES surveys of private schools.

A3. Appropriate Use of Information Technology

As in the 2003-04, 2005-06, 2007-08, 2009-10, 2011-12 , 2013-14, and 2015-16 PSS collections, the data from all 2016-19 paper questionnaires will be imaged and stored electronically. And, as in all previous PSS collections, CATI follow-up will be used in 2016-19 for mail/internet nonrespondents (an estimated 20 percent of all responses will be collected by CATI). Furthermore, the 2017-18, like the 2009-10, 2011-12, 2013-14, and 2015-16 PSS, will offer an internet response option to most schools (Amish and Mennonite schools will not be offered an internet response option). In addition, NCES will conduct a small test for the 2017-18 PSS to determine whether school e-mail addresses can be successfully obtained through clerical operations and whether survey invitations sent by e-mail will improve response rates.

A4. Efforts to Identify Duplication

One of the criteria for PSS is to collect only data that are not available elsewhere. The Elementary/Secondary Sample Survey Studies Program reviewed existing private school data collection efforts and found no other private school data collection effort existing or planned that will update the private school universe.

A5. Small Business or Entities

The PSS collects data from elementary and secondary private schools. Private schools are small entities. The respondent burden is minimal because of the limited questionnaire size (22 items) and because the data that are being collected are readily available from the administrative files of most private elementary and secondary schools.

A6. Frequency of Data Collection

The current plan is to continue to conduct the PSS for the entire private school universe biennially. If the PSS were collected less frequently, NCES would be forced to use sampling frames with significantly poorer coverage for its surveys of private schools.

A7. Special Circumstances of Data Collection

There are no circumstances that will require special data collection efforts.

A8. Consultations Outside the Agency

Key offices inside the U.S. Department of Education have reviewed the draft survey. Prior to the first PSS in 1989-90, NCES discussed its data collection plans with a number of private school associations. Representatives from the following private school associations participated in these initial discussions.

Association

Accelerated Christian Education
Agudath Israel of America
American Association of Christian Schools
American Montessori Society
Association of Christian Schools International
Association of Evangelical Lutheran Churches
Association of Military Colleges and Schools
Christian Schools International

Contact

Dr. Donald Howard
Rabbi Morton Avigdor
Dr. Robert Stashesky
Ms. Bretta Weiss
Dr. John Holmes
Mr. Kretzman
Lt. General Willard W. Scott
Dr. Sheri D. Haan

Council for American Private Education
 Evangelical Lutheran Church in America
 Friends Council on Education
 General Conference of Seventh Day Adventists
 Jesuit Secondary Education Association
 Lutheran Church, Missouri Synod
 National Association of Episcopal Schools
 National Association of Independent Schools
 National Association of Private Schools for
 Exceptional Children
 National Catholic Educational Association
 National Coalition of Alternative Community Schools
 National Independent Private School Association
 National Society of Hebrew Day Schools
 Oral Roberts Educational Fellowship
 Solomon Schechter Day Schools
 U.S. Catholic Conference
 Wisconsin Evangelical Lutheran Synod

Ms. Joyce McCray
 Mrs. Billie Navarro
 Ms. Kaye Edstene
 Dr. G. L. Plubell
 Rev. Carl E. Meirose
 Mr. Carl Moser
 Ms. Ann Gordon
 Dr. Peter Relic
 Ms. Sherry L. Kolbe

 Mr. Frederick Brigham
 Ms. Pat Montgomery
 Ms. Carolyn Crider
 Rabbi Fishman
 Dr. David Hand
 Mr. Meir Efrati
 Father William Davis
 Dr. Daniel Schmeling

Since the 1989-90 PSS, private school group meetings have been held annually with affiliation representatives to inform them of the PSS status. The last meeting was held in October 2015. The following private school groups were represented at the meeting:

Agudath Israel of America
 American Association of Christian Schools
 Association of Christian Schools International
 Association of Christian Teachers and Schools
 Council for American Private Education
 National Association of Independent Schools
 National Catholic Educational Association

 Association
 Oral Roberts University Education Fellowship
 Lutheran Church Missouri Synod
 National Independent Private School Association
 The Association of Christian and Classical Schools
 Islamic School League of America
 The Jewish Education Project
 Christian Schools International

David Tanenbaum
 Jamison Coppola
 George Tryfiates
 R. J. Nelson
 Joseph McTighe
 Amada Torres
 Dale McDonald
 National Christian School
 Philip Patterson
 Donnie Peal
 Matthew Bergholt
 Allan Blau
 David Goodwin
 Seema Imam
 Martin Schloss
 David Koetje

A9. Payment or Gifts to Respondents

Not applicable.

A10. Assurance of Confidentiality

The law does not require disclosure protection of institutions, such as schools; therefore, no assurance of confidentiality is provided to respondents.

A11. Need for the Use of Sensitive Questions

The questions contained in this survey—grade levels taught, length of the school day and school year, religious orientation, type of school, number of teachers, enrollment, race/ethnicity of students, and number of graduates—are not considered to be sensitive.

A12. Estimates of Information Collection Burden

2017-18 and 2019-20 PSS Frame Development

During the development of the list-frame portion of the 2017-18 PSS universe (see Part B.2), lists of private schools will be requested and received from approximately 100 state agencies and private school associations. It is estimated that each list response will take an hour, resulting in 100 hours of respondent burden. Approximately 6,600 screener calls will be made to institutions discovered in the list-frame operation to determine their eligibility for PSS. The average length of these calls is estimated to be 3 minutes, resulting in 330 hours of respondent burden for the list-frame screener operation. Total response burden for 2017-18 PSS list-frame development activities is 430 hours. The same procedures and burden estimates apply to the 2019-20 PSS Frame Development.

2017-18 PSS data collection

Approximately 8,000 screener calls will be made to institutions discovered in the area-frame operation (see Part B.2) to determine their eligibility for the PSS. The average length of these calls is 3 minutes, resulting in 400 hours of respondent burden for the area-frame screener operation. Survey questionnaires will be sent to all of the cases on the 2017-18 universe. The requested data can be easily obtained from school records. Based on the 2011-12 PSS experience, the average completion time is estimated to be 20 minutes per respondent (27,000), for a total of 9,000 hours of questionnaire respondent burden.

2017-18 PSS Data Collection and 2017-18 and 2019-20 PSS Frame Development Burden Estimate

Document Type	Affected Public	Respondents per Administration	Responses	Burden Time (min)	Years Applicable	Can Be Submitted Electronically	Percent Responding Electronically	Electronic Capability	Obligation to Respond	Total Burden Hours
State School List Request Letter	State Agencies (Education, Social Services, Child Care)	70	70	60 min	2017-18 and 2019-20	Yes	90%	Electronic and paper versions	Voluntary	70
Association School List Request Letter	Private School Associations	30	30	60 min	2017-18 and 2019-20	Yes	50%	Electronic and paper versions	Voluntary	30
Eligibility Telephone Script (list-frame)	Private Schools	6,600	6,600	3 min	2017-18 and 2019-20	No	0%	Telephone only	Voluntary	330
Subtotal for 2017-18 & 2019-20 Frame Developments (2 Administrations)		13,400	13,400	-	-	-	-	-	-	860
Eligibility Telephone Script (area-frame)	Private Schools	8,000	8,000	3 min	2017-18	No	0%	Telephone only	Voluntary	400
PSS Questionnaire	Private Schools	27,000	27,000	20 min	2017-18	Yes	18%	Electronic and paper versions	Voluntary	9,000
Subtotal for 2017-18 Data Collection		27,000	35,000	-	-	-	-	-	-	9,400
Total Burden		27,200*	48,400							10,260

* Unduplicated count of contacted respondents.

The standard NCES procedure for estimating costs to school staff is to multiply the estimated total survey reporting hours (10,260) by the average salary of school employees (estimated to be \$44.13 per hour¹). Following these conventions, the “cost” to the respondents is estimated to be about \$452,774 for the 2017-18 PSS data collection and 2017-18 and 2019-20 PSS frame development time burden.

A13. Capital and Operating Costs to Respondents

Respondents will not incur any costs other than their time to respond.

A14. Estimates of Cost to the Federal Government

NCES estimates that the total federal cost for the 2017-18 PSS is approximately **\$4,297,988** (\$303,240 in FY 2016, \$1,441,477 in FY 2017, \$2,279,570 in FY 2018, and \$273,701 in FY 2019), and for the portion of the 2019-20 PSS covered by this clearance is approximately **\$814,506** (\$315,370 in FY 2018, and \$499,136 in FY 2019). This estimate was compiled from individual estimates developed within each U.S. Census Bureau division involved in the survey. Estimates were based on the universe size, the length of the questionnaire, and required data processing. Administrative overhead, design, printing, and mailing costs were included. Thus the average annual cost for the 2017-18 and 2019-20 collections over the three year period is **\$1,704,115**.

A15. Changes in Burden

There is no change in the estimated number of respondents or burden per respondent from the last approved PSS administration. The apparent increase in total burden hours is due to the last clearance request listing burden of two data collection years based on a three-year average, while this request list total burden requested from June 2016 through May 2019.

A16. Publication Plans/Time Schedule

2017-18 PSS

The first mailing of questionnaires (web invitation or paper questionnaire) is scheduled for October 3, 2017. A second mailout (paper questionnaire only) for schools that did not respond to the first mailout is scheduled for November 2017. A third mailout (paper questionnaire) for schools that did not respond to the first or second mailout is scheduled for December 2017. Telephone follow-up for nonresponse will begin in January 2018. Personal visit follow-up for mail/internet noninterviews and CATI noninterviews is scheduled for January 2018 through May 2018.

The 2017-18 PSS survey will be conducted according to the following time schedule:

Request Private School Lists	7/5/2016
Conduct Screener Calls for List-Frame Schools	8/2016-5/2017
Conduct Screener Calls for Area-Frame Schools	9/5/2017-9/30/2017
1 st Survey Mailout (Web invitation or paper questionnaire)	10/3/2017
2 nd Survey Mailout (Paper questionnaire only)	11/2017
3 rd Survey Mailout (Paper questionnaire only)	12/2017
CATI/Field Followup	1/2018-5/2018
Check-in, Clerical Edit	10/2017-5/2018

¹ Source: BLS Occupation Employment Statistics, <http://data.bls.gov/oes/> datatype: Occupation codes Education Administrators (11-9032); accessed on January 15, 2016.

Process Data	11/2017-10/2018
Final File	11/2018
NCES Reports Results	4/2019

2019-20 PSS Frame Development

Data collection for the 2019-2022 PSS will be conducted under the future 2019-22 PSS OMB clearance.

The 2019-20 PSS frame development will be conducted according to the following time schedule:

Request Private School Lists	7/2/2018
Conduct Screener Calls for List-Frame Schools	8/2018-5/2019

One of the purposes of this survey is to produce descriptive statistics about the number of private schools, teachers, students, and high school graduates. Survey responses will be weighted to produce national estimates. Tabulations will be produced for each data item. Cross tabulations of data items will be made with selected classification variables such as religious orientation (Catholic—parochial, diocesan, private; other religious—conservative Christian, affiliated, unaffiliated; nonsectarian—regular, special emphasis, special education); size of student body (less than 50, 50 to 149, 150 to 299, 300 to 499, 500 to 749, 750 or more); and level of instruction (elementary, secondary, combined). See Appendix E for examples of table shells (for a more comprehensive set of tables see *Characteristics of Private Schools in the United States: Results From the 2011-12 Private School Universe Survey, NCES 2013-316*, which can be accessed from the PSS web page at <http://nces.ed.gov/surveys/pss>). NCES will publish the 2017-18 survey results in April 2019.

A17. Request Not to Display Expiration Date

Not applicable.

A18. Exceptions to the Certifications

Not applicable.