NATIONAL CENTER FOR EDUCATION STATISTICS

Volume I
Supporting Statement

Civil Rights Data Collection (CRDC)
Burden Research Study

OMB# 1850-0803 v.281

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Appendices

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1) Submittal-Related Information

The following material is being submitted under the National Center for Education Statistics (NCES) generic clearance agreement (OMB# 1850-0803), which provides NCES the capability to improve data collection instruments by conducting testing such as usability tests, focus groups, and cognitive interviews to improve methodologies, survey questions, and/or delivery methods. This request is to conduct in-depth interviews to obtain Civil Rights Data Collection (CRDC) participant feedback needed to evaluate and update ED's estimates of the level of burden of the CRDC on public school districts in the United States.

2) Background and Study Rationale

Since 1968, ED has conducted the CRDC to collect data on key education and civil rights issues in our nation's public schools. The CRDC collects a variety of information including student enrollment and educational programs and services. It is a longstanding and important aspect of the ED Office for Civil Rights (OCR) overall strategy for administering and enforcing the civil rights statutes for which it is responsible; it is mandatory for public school districts to respond to the CRDC. The most recent CRDC administration collected data about the 2017-18 school year. OCR is preparing the next data collection which is proposed for the 2020-21 school year. Every data collection is submitted to OMB for approval. Part of the OMB submission requires OCR to estimate the burden on schools and school districts. The burden estimates are based on information that is at least ten years old and some school officials have indicated the burden estimates are inaccurate. Therefore, OCR wishes to conduct research which will update the burden estimates and hopefully better inform OCR in how to conduct future data collections.

The National Center for Education Statistics (NCES) supports OCR in conducting research and evaluation to help improve the accuracy of the CRDC and reduce burden on school districts. As part of this collaborative effort, NCES is assisting OCR with evaluating and updating the estimated burden hours for school districts to prepare for, report on, and validate their CRDC submission. To ensure that appropriate and relevant feedback is obtained from diverse school districts, NCES is proposing to conduct in-depth qualitative interviews with 36 school districts about the time and effort they spend on the CRDC. The most recent CRDC (the 2017-18 school year which was retrospectively reported in 2019, with validation in 2020) will be used as the burden estimate benchmark year.

This research will obtain relevant feedback from district and school administrators. The interviews are expected to provide important feedback on the activities which districts undertake to respond to the CRDC and estimates of staff time needed to accomplish these activities. Activities include preparing data systems for the CRDC, gathering information, communication and coordination among schools, districts, and state education agencies, entering and uploading data, and reviewing and correcting data.

3) Recruitment and Data Collection

Recruitment

The American Institutes for Research (AIR) has an existing contract with NCES for various services. NCES has contracted with AIR to conduct this burden research study. They will be

responsible for the overall management of the project, as well as recruitment and administration. AIR will seek to find participants from the 2017-18 CRDC contact list, maintained by OCR. The list will be stratified in order to recruit districts representing the 12 OCR regional offices, as well as districts with a mix of student enrollment sizes. Recruitment will be by an email invitation (Appendix A.1) which will provide a link for districts to respond to a voluntary, online recruitment questionnaire (Appendix B.1). The recruitment questionnaire is expected to take no more than 5 minutes to complete and will contain questions needed to identify school district characteristics that will ensure a diverse sample of districts are selected for interview.

To keep the level of burden minimal for any one school district, we will send only one email invitation requesting participation and, therefore, expect only 20 percent of districts to respond to the recruitment questionnaire. In order to obtain a diverse set of school districts from which to draw the in-depth interview sample, we will email 3,600 school districts to yield approximately 720 districts responding to the screener, from which we will draw three samples of 36 districts; the three samples include the main sample and two reserve samples. The reserve samples will only be used if any of the main sample of 36 districts drop out of the study and need to be replaced.

To confirm a sampled district is still willing to participate in an interview they will be contacted by phone (Appendix A.2) and/or emailed (Appendix A.3) to schedule an interview at their earliest convenience. After a district agrees to participate, they will be sent an email to confirm their agreement and provide details about the interview and project information (Appendix A.4). School districts that responded to the recruitment questionnaire but are not selected for an in-depth interview will receive an email notification that they were not selected to participate (Appendix A.6).

The recruitment procedure will ensure that:
- Participants will be informed of the objectives, purpose, and participation requirements of the data collection effort, as well as the activities that it entails, as stated within the interview protocol.
- Up-to-date contact information including telephone numbers, email, and postal contact information is collected for the in-depth interviews.
- Districts representing the 12 OCR regional offices are recruited, as well as a mix of student enrollment sizes.
- Participants will receive an email reminder at least 24 hours prior to the interview to confirm participation (Appendix A.5).

Data Collection

AIR will conduct 1-hour interviews with participants from 36 school districts. We will request participation from one participant per participating school district but will accept additional participants as many districts split the CRDC reporting responsibilities among several staff members. Even if there are multiple participants, there will only be one interview conducted per participating school district.

Interviews will be conducted online by a researcher from AIR, using either GoToMeeting or Microsoft Teams online meeting software. We will provide the interview protocol (Appendix

B.2) to participants in advance of the interview. Interviews will be recorded. Interviewers will undergo training on the prepared interview protocol, and each interview will have an observer/notetaker.

After the interviews, findings from the notes taken and from the interview recordings will be compiled and included in a report that will describe the methodology used, the results of the recruitment questionnaire and in-depth interviews, and the study limitations.

4) Consultations Outside the Agency

NCES and OCR have collaborated to provide input into the research effort. In prior and separate research about past CRDC administrations (2013-14 and 2015-16), OCR has gathered school, district, state education agency, and OCR regional office input into the procedures used to respond to the CRDC and which sections of the CRDC are most burdensome. Findings from this research informed the development of the burden research study interview protocol. Further, the tasks of recruitment and data collection will be carried out by employees of AIR, as detailed above.

5) Justification for Sensitive Questions

No sensitive questions about district respondents or students are anticipated. This research is focused exclusively on the process of responding to the CRDC and estimates of time burden. Interviewers will not ask for any data that is collected in the CRDC.

6) Paying Respondents

No payments will be made to respondents.

7) Assurance of Confidentiality

The study will not retain any personally identifiable information. Prior to the start of the study, participants will be notified that their participation is voluntary and that the information they provide may be used only for statistical purposes and may not be disclosed, or used, in identifiable form for any other purpose except as required by law (20 U.S.C. §9573 and 6 U.S.C. §151).

8) Estimate of Hourly Burden

The estimated burden for recruitment assumes 20 percent of districts will respond to the recruitment questionnaire (yielding 720 respondents) and a screener completion time of 5 minutes (1/12, or .083, of an hour). The in-depth interview will be 1 hour. We have also allowed for 1 additional hour of preparation time so districts can review the interview questions (Appendix B.2 to be included as attachment to Appendix A.5) and prepare or discuss responses in advance. To allow for multiple respondents per school district, we have assumed we may potentially speak with 3 respondents per district, which yields a maximum of 108 respondents and responses (36 districts x 3 respondents). Table 1 details the estimated burden.

Table 1. Response Burden

Activity	Number of respondents	Number of responses	Hours per response	Total hrs (rounded up)
Recruitment screener	720	720	0.083	60
Interview preparation + Interviews	108*	108	2	216
Total Burden	828	828	-	276

*Although all respondents will be parts of districts that participated in the recruitment screener questionnaire, because many districts split the CRDC reporting responsibilities among several staff members, there may be multiple participants per interview, including respondents that did not participate in the screener questionnaire.

9) Costs to Federal Government

The estimated cost for the research described in this submittal is $40,000 as shown in Table 2.

Table 2. Estimate of Costs

Activity	Provider	Estimated Cost
Research design, preparation, administration (including recruitment, data collection, and documentation), data analysis, and reporting	AIR	$40,000

10) Schedule

Table 3. High-Level Schedule of Milestones

Activity	Dates
Recruitment	December 2020
In-depth interviews	January 2021
Report	March 2021