

**Public Comments Received During the 30-day Comment Period
February 2019
Private School Universe Survey 2019-2020 and 2021-2022
ED-2018-ICCD-0119 Comments on FR Doc # 2019-00106**

Document: ED-2019-ICCD-0119-0010
Name: Carol Burris, Network for Public Education

The Network for Public Education (NPE) submits these comments in support of the Private School Universe Survey (“PSS”). The Network for Public Education is a national public school advocacy organization with 330,000 supporters.

Collecting data from private schools is critical to understanding the schools and students participating in these programs, especially in regard to the civil rights protections of students attending with tuition subsidized by public funding.

We suggest the PSS questionnaire should also include the following questions:

1. Does this school or program participate in or enroll students using a state-authorized private school scholarship, voucher program, “ESA” account, or tax credit scholarship?

If so:

Please identify the private school scholarship, voucher, ESA, or tax credit scholarship program(s).

2. How many students attending the school use funds from such programs to pay for or supplement their tuition?
3. What is the approximate amount of funding, or percentage of this school’s funding, that comes from these programs?
4. How many students enrolled in grades K-12 and comparable ungraded levels who attend the school or program using state-authorized private school scholarships, ESAs, or tax credit scholarships were:
 - English language learners?
 - Students with disabilities?
 - Participants in or eligible for the National School Lunch Program?
 - Students who receive Title I services?
 - Hispanic or Latino?
 - White?
 - Black or African American?
 - Asian American?
 - Native Hawaiian or Pacific Islander?
 - American Indian or Alaskan Native?
 - Two or more races?
5. How many persons teaching at this school or program are providing special education or other services specifically for students with disabilities? Are there restrictions on the kinds of disabilities that are serviced by the school?
6. Do the policies of the school discourage the enrollment of, or employment of, LGBT persons?
7. Is the school faith-based? If so, does it allow students to “opt out” of participation in religious instruction or services?

Thank you for your consideration.

Document: ED-2019-ICCD-0119-0014

Name: Public Funds Public Schools (PFPS)

Public Funds Public Schools (“PFPS”) submits these comments in support of the Private School Universe Survey (“PSS”). PFPS is an initiative of Education Law Center and the Southern Poverty Law Center concerned with issues including the rapid expansion of state-authorized private school scholarships, Education Savings Accounts (“ESAs”), and tax credit scholarship programs, and the need for additional data regarding their use. Collecting data from private schools is critical to understanding the schools and students participating in these programs.

In addition to its current content, we suggest the PSS questionnaire should also include the following questions:

1. Does this school or program participate in or enroll students using a state-authorized private school scholarship, “ESA” account, or tax credit scholarship? If so:
 - a. Please name the private school scholarship, ESA, or tax credit scholarship program(s).
 - b. How many students attending the school use funds from such programs to pay all or part of their tuition?
 - c. What is the approximate amount of funding, or percentage of this school’s funding, that comes from these programs?
2. Around the first of October, how many students enrolled in grades K-12 and comparable ungraded levels who attend the school or program using state-authorized private school scholarships, ESAs, or tax credit scholarships were:
 - a. English language learners?
 - b. Students with disabilities?
 - c. Participants in the National School Lunch Program?
 - d. Students who receive Title I services?
 - e. Hispanic or Latino?
 - f. White?
 - g. Black or African American?
 - h. Asian?
 - i. Native Hawaiian or Pacific Islander?
 - j. American Indian or Alaskan Native?
 - k. Two or more races?
3. Around the first of October, how many persons teaching at this school or program were providing special education or other services specifically for students with disabilities?

These data points will provide the U.S. Department of Education and the public with additional, valuable information about private schools and their students.

NCES Response:

Dear Ms. Burris and Public Funds Public Schools (PFPS),

Thank you for your feedback posted on February 25, 2019 and February 26, 2019, respectively, responding to a 30-day request for comments on the proposed 2019–20 and 2021-22 Private School Universe Survey (PSS). The National Center for Education Statistics (NCES) appreciates your interest in the PSS survey. I have provided a response to each of your comments below.

Network for Public Education (NPE) Comments 1-4 and PFPS Comments 1-2

Since the purposes of the PSS are to produce basis statistics on private schools and to serve as a private school sampling frame for NCES sample surveys, we strive to keep the questionnaires as short as possible to keep response rates as high as possible. The collection of more detailed information is usually reserved for the NCES sample surveys.

Collecting finance data from private schools through a voluntary survey is particularly problematic. Although NCES has long recognized the need for data on private school revenues and expenditures, some private schools have been reluctant to provide finance data. In the last NCES field test of a finance data collection for private schools, only about one third (33.8 percent) of schools responded. NCES will explore options for collecting information on participation in these programs from publicly available sources. We will also discuss the ability and willingness of private schools to provide this information at an upcoming meeting with private school association representatives.

NPE Comment 5 and PFPS Comment 3

Assignment specific information for teachers is collected on the teacher questionnaire of the National Teacher and Principal Survey (NTPS). The data support national estimates of teachers of students with disabilities. The number of special education aides is collected on the private school questionnaire of the NTPS as well. A question on restrictions on the kinds of disabilities serviced would require cognitive testing and would be more appropriate on a sample survey like the NTPS, which already asks questions about students with disabilities. NCES will conduct research on including in a future NTPS collection items to measure restrictions on the kinds of disabilities serviced and will make a determination on whether such items can be added to NTPS based on the results of that research.

NPE Comment 6

Currently, for space considerations, the PSS does not ask school policy questions. Some LGBT items are being developed for public schools in the NTPS. At a meeting of private school association representatives held at NCES in 2017, many of the representatives indicated that such questions could lead them to discourage participation of member schools. Because of the effects on response rates, NCES decided not to pursue this topic with private schools at this time.

NPE Comment 7

The PSS has asked if the school has “a religious orientation or purpose” since 1989. Currently for space considerations the PSS does not ask any school policy questions. The “opt out” item would also be more appropriate on a sample survey like the NTPS. NCES will conduct research on including in a future NTPS collection an “opt out” items and will make a determination on whether such items can be added to NTPS based on the results of that research.

Sincerely,

Steve Broughman
Private School Universe Survey
Cross-Sectional Surveys Branch
National Center for Education Statistics (NCES)
U.S. Department of Education
Office: 202-245-8338

Document: ED-2019-ICCD-0119-0011

Name: Dale McDonald

The National Catholic Educational Association (NCEA) welcomes the opportunity to comment on the notice

of the proposed revision [Docket No. ED-2018-ICCD-0119] regarding Agency Information Collection Activities: Submission to the Office of Management and Budget for Review and Approval; Comment Request; Private School Universe Survey (PSS) 2019-20 and 2020-22.

NCEA offers the following comments to the U.S. Department of Education, National Center for Education Statistics (NCES) in support of continuing the data collection:

1) Necessity for functioning of the Department:

The U.S. Department of Education's mission statement includes "collecting data on America's schools and disseminating research." The statement does not reference, nor claim, it represents only public schools. Since private schools account for about 26 percent of all schools in the nation and educate approximately 9 percent of all school children across the country, it is important that data pertaining to that sector of the educational landscape be included in all data that describe the condition of education in the United States. With the growing alternatives for educating students the need for data on private education has become more important. NCES has and should continue to make the collection of data on private elementary and secondary schools a significant component of any survey if the accuracy and authenticity of educational data are to be maintained.

2) Processed and used in a timely manner:

NCES must make greater efforts for a more timely publication of the data. The last publication of data tables available contains results from the 2015-2016 collection. If data are to be used effectively, they should be more current than three school years and should be congruent with the publication of public school data.

NCEA appreciates the opportunity to offer these comments. The National Catholic Educational Association is the largest, private professional education association in the world. NCEA works with Catholic educators to support the ongoing faith formation and the teaching mission of the Catholic Church. The NCEA membership includes more than 150,000 educators serving 1.8 million students in Catholic schools. NCEA focuses on leadership development for superintendents, presidents, principals, pastors, and governing bodies; professional development for teachers; and serving as the voice for Catholic school education.

Dale McDonald, PBVM, PhD
Director of Public Policy and Educational Research

Document: ED-2019-ICCD-0119-0013

Name: Michael Schuttloffel, Council for American Private Education (CAPE)

The Council for American Private Education (CAPE) welcomes the opportunity to comment on the notice of the proposed rulemaking and to offer our support for continuing the data collection. CAPE is a coalition of national organizations and state affiliates serving private elementary and secondary schools. CAPE member organizations represent about 80 percent of private school enrollment nationwide.

Continuing Need for Data on Private Schools

The U.S. Department of Education's mission statement includes "collecting data on America's schools and disseminating research." Importantly, the statement does not claim that the Department only represents public schools. Since private schools account for approximately twenty-six percent of all schools in the nation and educate approximately nine percent of all school children across the country, it is important that data pertaining to that sector of the educational landscape be included in all data that describe the condition of education in the United States. With the increasing availability of alternatives for educating students, the need for data on private education has become even more important. NCES has and should continue to make the collection of data on private elementary and secondary schools a significant component of any survey if the accuracy of educational data is to be maintained.

Need for Increased Timeliness of Data Publication

It is our view that NCES should endeavor to bring about more timely publication of the data. The most recent data tables available contain results from the 2015-2016 collection. If the data are to be used effectively, it should be more current than three school years old and should be congruent with the publication of public school data.

CAPE appreciates the opportunity to offer these comments.

Sincerely,

Michael Schuttloffel, Executive Director

NCES Response:

Dear Dr. McDonald and Mr. Schuttloffel,

Thank you for your feedback posted on February 25, 2019 and February 26, 2019, respectively, responding to a 30-day request for comments on the proposed 2019–20 and 2021-22 Private School Universe Survey (PSS). The National Center for Education Statistics (NCES) appreciates your interest in the PSS survey.

NCES recognizes that the publication of data should be timely. To this end, NCES has a requirement that a substantive report be released from studies like PSS within a year of the end of data collection. Given that PSS data are collected every other year, the latest PSS data that have been published are for the 2015-16 school year. The 2017-18 data have now been processed and the 2017-18 PSS report is about to enter the review process. PSS reports are scheduled to be publically released in the summer within one year of the end of data collection.

For NCES sample surveys, the publication of private and public school data occur at the same time. This however is not possible for the PSS because the PSS collection schedule does not match that of the public school universe collection. The public school universe data are collected through the Common Core of Data (CCD) annually, whereas the PSS data are collected every two years. At this time NCES does not have the resources to conduct the PSS annually. Also, the CCD employs a state administrative records collection methodology, rather than contacting individual schools as must be done in the PSS, and thus CCD can be accomplished significantly more readily and cost efficiently on an annual basis as compared to PSS.

Sincerely,

Steve Broughman
Private School Universe Survey
Cross-Sectional Surveys Branch
National Center for Education Statistics (NCES)
U.S. Department of Education
Office: 202-245-8338

Document: ED-2019-ICCD-0119-0012

Name: James Harvey, National Superintendents Roundtable

Notably absent from the description of data collected in the PSS is any mention of private school finance. In consequence, the "Digest of Educational Statistics" includes only a very limited estimate of private school expenditures, a well-intentioned estimate that seems to be little more than educated guesswork. The "Condition of Education" is completely silent on private school funding.

At a minimum it would seem useful to explore the size of school budgets and the source of funding (tuition, endowment, church support, etc.) It would also be helpful to examine private schools on metrics widely used

in public schools, such as enrollment of students of color, students with disabilities, students eligible for Title I services, and the proportion of low-income students.

As public funds increasingly find their way into private school budgets via for-profit charter entities, vouchers, and Education Savings Accounts, information on the amount and source of public funds in private schools is badly needed for policy making purposes.

NCES Response:

Dear Mr. Harvey,

Thank you for your feedback posted on February 25, 2019 responding to a 30-day request for comments on the proposed 2019–20 and 2021-22 Private School Universe Survey (PSS). The National Center for Education Statistics (NCES) appreciates your interest in the PSS survey. I have provided a response to each of your comments below.

Since the purposes of the PSS are to produce basis statistics on private schools and to serve as a private school sampling frame for NCES sample surveys, we strive to keep the questionnaires as short as possible to keep response rates as high as possible. The collection of more detailed information is usually reserved for the NCES sample surveys.

Collecting finance data from private schools through a voluntary survey is particularly problematic. Although NCES has long recognized the need for data on private school revenues and expenditures, some private schools have been reluctant to provide finance data. In the last NCES field test of a finance data collection for private schools, only about one third (33.8 percent) of schools responded. NCES believes that the collection of private school finance data would not be comprehensive, complete, and comparable in the current environment.

Charter schools, even those managed by a for-profit entity, are classified as public schools and would not be eligible for the PSS. A charter school is defined as a school providing free public elementary and/or secondary education to eligible students under a specific charter granted by the state legislature or other recognized public chartering agency, and designated by such authority to be a charter school. Finance data for charter schools are reported to the Common Core of Data (CCD) fiscal collections: the National Public Education Financial Survey (NPEFS), the Local Education Agency Financial Survey (Form F-33), and the School Level Finance Survey (SLFS)

Student enrollment by race/ethnicity is already collected by the PSS. The number of students with disabilities, receiving Title I services, and the percentage of students approved for free or reduced-price lunches under the National School Lunch Program is collected by the National Teacher and Principal survey (NTPS).

Sincerely,

Steve Broughman
Private School Universe Survey
Cross-Sectional Surveys Branch
National Center for Education Statistics (NCES)
U.S. Department of Education
Office: 202-245-8338