

# Public Comments Received During the 60-day Comment Period and NCES Response

July 2019

## National Public Education Financial Survey (NPEFS) 2019-2021: Common Core of Data (CCD)

ED-2019-ICCD-0053

Comment on FR Doc # 2019-08682

### Submitter Information

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Your data collection ignores getting information from parents about how their children are served. Tell that to my clients whose children have not been classified (in suburban districts) or who have been passed from one grade to the next even though their reading ability remains below grade level - all low income, all minorities - in an urban district. Or to my clients whose children have been given false passing grades because the districts have power, but the parents don't.

Please add a survey for at least 10,000 parents from a variety of districts whose children have IEPs, plus 5,000 parents whose children have been declassified within the last 3 years. Divide the surveys into types of districts: urban, suburban and rural. Ask for comments on satisfaction from the people who matter - the parents!

### NCES RESPONSE:

Thank you for your comment. Although the National Public Education Financial Survey (NPEFS) does not collect data from or about individuals, parent questionnaires and data collected through them can be found in the following studies currently being conducted by the National Center for Education Statistics (NCES): the Early Childhood Longitudinal Studies (ECLS) program studies; the National Household Education Surveys (NHES); the High School Longitudinal Study of 2009 (HLS:09); and the Middle Grades Longitudinal Study (MGLS:2017).

The ECLS program currently includes three longitudinal studies that examine child development, school readiness, and early school experiences. The birth cohort of the ECLS-B is a sample of children born in 2001 and followed from birth through kindergarten entry. The kindergarten class of 1998-99 cohort is a sample of children followed from kindergarten through the eighth grade. The kindergarten class of 2010-11 cohort followed a sample of children from kindergarten through the fifth grade. Parents participated in every round of these three ECLS studies. Parents from all geographic areas, including urban, suburban, and rural areas participated in the three ECLS studies. Parents will also respond to questions set forth in the newest study, the Early Childhood Longitudinal Study, Kindergarten Class of 2022-23 (ECLS-K:2023). The ECLS-K:2023 cohort is currently planned to follow a sample of children beginning in the spring before their kindergarten year through the fifth grade and will commence national data collections in 2022.

The ECLS program provides national data on children's status at birth and at various points thereafter; children's transitions to nonparental care, early education programs, and school; and children's experiences and growth through the eighth grade. The ECLS program also provides data to analyze the relationships among a wide range of family, school, community, and individual variables with children's development, early learning, and performance in school. While there are in excess of 10,000 parents in each ECLS study, the sample size for parents of students with Individualized Education Plans (IEPs) is smaller than the full sample. However, the sample size is large enough for national representation of these students and to make statements about the parent reports on this representative child cohort.

A recent summary of questions asked of parents in the most recently-released ECLS data set can be found in the kindergarten-fourth grade public-use data user's manual for the ECLS-K:2011 in section 2.1.3 (Parent Interview) of <https://nces.ed.gov/pubs2018/2018032.pdf>. The parent interviews were conducted during every round of the ECLS-K:2011; this manual provides the greatest detail on the parent interviews that were conducted during the spring fourth-grade data collection of ECLS-K:2011 (again, the most recent round for which public-use ECLS data are available). The spring fourth-grade parent interview included many of the same questions that were included in the kindergarten, first-grade, second-grade, and third-grade rounds of the study, for example, questions about parent involvement in the

child's school; homework; time children spent playing video games; children's participation in out-of-school activities; whether there had been a change in the relationship of one of the parent figures to the child (e.g., adoption); and child health and well-being. The ECLS study instruments can be found online at: <https://nces.ed.gov/ecls/>.

NHES collects nationally representative, descriptive data on the educational activities of children and adults in the United States. NHES surveys are conducted every 3 years on topics including early education, family involvement in schools, homeschooling, and adult training and education. These data may be used to analyze trends over time. In 2019, NHES will collect data about young children's care and education before kindergarten, parent involvement in education from kindergarten to high school, and homeschooling. The survey covers a broad array of parental involvement topics (<https://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2017102>).

Data about school-age children are currently collected in the NHES's Parent and Family Involvement in Education (PFI) Survey. Parents are the respondents in the PFI survey, which collects data about students who are enrolled in kindergarten through grade 12 and asks questions about satisfaction with school, child's IEP status, satisfaction with the service provider/school in implementing the child's IEP, school choice, and various aspects of parent involvement in education, such as help with homework, family activities, and parent involvement at school ([https://nces.ed.gov/nhes/parent\\_involvement.asp](https://nces.ed.gov/nhes/parent_involvement.asp)).

The *Digest of Education Statistics* utilizes NHES to create a table that demonstrates whether parents were satisfied or dissatisfied with various aspects of their children's schools. A typical summary tabulation can be found at: [https://nces.ed.gov/programs/digest/d17/tables/dt17\\_206.50.asp?current=yes](https://nces.ed.gov/programs/digest/d17/tables/dt17_206.50.asp?current=yes).

HSLs:09 is a nationally representative, longitudinal study of over 23,000 ninth graders from 944 schools in 2009, with a first follow-up in 2012, and a second follow-up in 2016. This study follows students throughout their secondary and postsecondary years assessing student trajectories, major fields of study, and career paths. The HSLs:09 contains surveys of students, their parents, math and science teachers, school administrators, and school counselors. Parents of sampled students were asked to select the highest level of education that they expected their child to complete as part of HSLs:09. There are questions about disabilities, for parents of students with and without IEPs in HSLs:09. See the following links for the parent surveys: [https://nces.ed.gov/surveys/hsls09/pdf/2009q\\_parent.pdf](https://nces.ed.gov/surveys/hsls09/pdf/2009q_parent.pdf) and [https://nces.ed.gov/surveys/hsls09/pdf/2012\\_parent.pdf](https://nces.ed.gov/surveys/hsls09/pdf/2012_parent.pdf). At several points over time, students were also asked to select the highest level of education they expected themselves to complete. The Data Point report entitled *Parent and Student Expectations of Highest Education Level (2019-015)* presents data on changing expectations throughout students' high school years and the three years after (<https://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2019015>). A table focusing on student expectations for highest education level for students with and without IEPs can be found in the HSLs:09 Table Library, at: [https://nces.ed.gov/surveys/hsls09/tables/ed\\_expect\\_special.asp](https://nces.ed.gov/surveys/hsls09/tables/ed_expect_special.asp).

MGLS:2017 is the first study to follow a nationally representative sample of students as they enter and move through the middle grades. The MGLS:2017 was designed to provide data on students' development and learning that occurs during the middle grade years (grades 6 through 8) and that are predictive of future success, along with the school and non-school factors related to that positive development. Parent questionnaires are being utilized in MGLS:2017. Variables under development for the final data collection instruments include but are not limited to parent involvement (contact with school about behavior, school schedule, and guidance for assisting with homework); parental participation in IEP development; parental satisfaction with student services received; parent-child relationship (monitoring, discipline); and support for students with disabilities.

The results and reports from these studies are available on the NCES website at <https://nces.ed.gov/> (MGLS:2017 data are most recent and thus forthcoming). Thank you again for your comment and please do not hesitate to contact staff from those studies (contact information is provided on the NCES website) with questions.

Sincerely,

Stephen Q. Cornman  
Project Director  
National Public Education Financial Survey (NPEFS)  
School District Finance Survey (F-33)  
School-Level Finance Survey (SLFS)  
National Center for Education Statistics (NCES)  
U.S. Department of Education

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## Submitter Information

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**Organization:** Public Funds Public Schools

**Document:** ED-2019-ICCD-0053-0005

Public Funds Public Schools (“PFPS”) submits these comments in support of the National Public Education Financial Survey (“NPEFS”). 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 vouchers, Education Savings Accounts (“ESAs”), and tax credit voucher programs, and the need for additional data regarding both public and private schools. Collecting data regarding public school revenues and expenditures is critical to understanding public school funding, the use of public funds to support private schools, and the impact of such expenditures on public schools.

We believe it is important that the NPEFS continue to collect the following data, listed in the proposed survey form for 2019-2021:

1. Item Code E14: Tuition and Voucher Payments Outside the State, to Private Schools, Individuals, and Other
2. Item Code E4D: Direct Program Support for Private School Students

In addition to continuing to collect these data, we suggest that the NPEFS further disaggregate these categories of expenditures to isolate the payments made to private schools and individuals under specific programs, such as private school voucher programs, ESA programs, and textbook programs.

Continuing to collect these data – and including the additional details suggested above – will provide the U.S. Department of Education and the public with valuable information about the use of public funds for private education.

### NCES RESPONSE:

Thank you for your comment and for your support of the National Public Education Financial Survey (NPEFS). NPEFS collects data on the use of public funds for tuition and voucher payments within the following two variables:

1. Tuition and Voucher Payments Outside the State, to Private Schools, Individuals, and Other (Item Code E14).
2. Tuition and Voucher Payments to Other LEAs and Charter Schools Within the State (Item Code E15).

In particular, “payments made through private school voucher programs” are encompassed in the NPEFS E14 variable.

NPEFS also collects data on the use of public funds to support students in non-public school programs within the following two variables (expenditures such as those for “textbook programs” which support private school students are included in E4D and E9A):

3. Direct Program Support for Private School Students (Item Code E4D).
4. Non Public School Programs (Item Code E9A).

Additional information on data collected under the above mentioned four variables and the ability to is provided below.

- 1. Tuition and Voucher Payments Outside the State, to Private Schools, Individuals, and Other (Item Code E14):** Included in this item are payments made for an individual to attend elementary and secondary school in an LEA other than the one in which he or she resides, excluding payments to other LEAs and charter schools within the state.
- 2. Tuition and Voucher Payments to Other LEAs and Charter Schools within the State (Item Code E15).** This category consists ONLY for tuition paid from one LEA to another within the same state for educating students (e.g. an LEA pays tuition to another LEA to provide a student a special program that is not available in the LEA where the student resides). It includes payments to charter schools in the state, including charter schools that receive private funding or are otherwise in partnerships with private entities.
- 3. Direct Program Support for Private School Students (Item Code E4D):** Included in this item are payments made by the state to support students attending private schools and other schools established by agencies other than the federal, state, or local government. Direct program support is the amount of expenditures made by SEAs for, or on behalf of, local education agencies (LEAs). Expenditures reported here may include both tuition and support services. This item is only used as a means for those states that cannot correctly report these expenditures within the appropriate, function-specific categories. The data reported in E4D are more accurately captured on the

NPEFS fiscal data plan, a supplemental questionnaire completed by all NPEFS respondents that: (a) provides additional detail about the amounts reported on the main NPEFS survey for verification and clarification purposes and (b) allows us to determine how well SEAs can provide fiscal data of interest that are not collected on the main NPEFS survey. In Question 4e of the NPEFS fiscal data plan, states are asked to report the amount of “direct program support for private school students” to provide additional detail to Item Code E4D. Responses to the fiscal data plan are published annually in Appendix F of the NPEFS documentation. In FY 2016, five states reported \$390 million in direct program support expenditures in E4D. In Question 4e of the fiscal data plan, seven states reported \$398 million in direct program support expenditures for private school students. The two states that provided data in question 4e but did not provide data in E4D, included their direct program support expenditures in the E14 and “Non-Public School Programs” (Item Code E9A) categories. Efforts are underway to encourage states to report direct program support for private school students in either Item E14 (if the expenditures are for tuition or vouchers) or Item E9A (if the expenditures are for support services for students attending private schools or other non-public school programs).

- 4. Non Public School Programs (Item Code E9A).** This item includes expenditures for services for students attending private schools and other schools established by agencies other than the federal, state, or local government. The services consist of such activities as those involved in providing textbooks, instructional services, attendance and social work services, health services, and transportation services for nonpublic school students.
- 5. Education Savings Accounts (ESAs).** In the FY 2019 NPEFS data collection, included is a question on the NPEFS fiscal data plan requesting the names and amounts of programs where students or families receive funds for payment of elementary and secondary education expenses, to determine how well SEAs can provide such data. The question reads: “In your state, does the state education agency (SEA) provide funds directly to students or families for payment of elementary/secondary education expenses?” followed by: “If yes, please provide the amount [Non-Property] and specify the program names(s).” This question is aimed at identifying the amounts distributed to Education Savings Accounts (ESAs) and other types of private school choice programs funded by the state. Responses to this question will be published with the FY 2017 survey documentation.

In general, in order to add new data items or subitems on the NPEFS, NCES and U.S. Census Bureau staff initially engage the State Education Agency (SEA) fiscal coordinators in discussions pertaining to the feasibility of and the likely time burden involved in providing data for each new proposed item/subitem (SEA fiscal coordinators are respondents in NPEFS). First and foremost, there must be a match between the data being requested by NPEFS and the data that can be provided by the SEAs. If both feasibility and burden are deemed acceptable, then clearly articulated definitions for each new proposed item/subitem are carefully developed based on extensive consultation with SEA coordinators. Once new items/subitems have been deemed developed and approved by OMB, NCES and the U.S. Census Bureau offer SEAs significant technical assistance in producing the requested data.

Many states do not currently separately account for tuition and direct program support payments made to private schools and individuals under specific programs, such as private school voucher programs, ESA programs, and textbook programs. Given the annual NPEFS data collection cycle (see table below for NPEFS 2019), we do not have sufficient time to consider adding such disaggregation for NPEFS 2019. Subject to the development process for new NPEFS items/subitems described above, disaggregating expenditures to isolate tuition and direct program support payments made to private schools and individuals under specific programs, such as private school voucher programs, ESA programs, and textbook programs will be considered for future NPEFS collections.

	<b>NPEFS 2019 Survey Collection, Processing, and Publication</b>
Late January 2020	Mail instructions to respondents and open NPEFS website to receive data SEAs can begin to submit accurate and complete data
March 15, 2020	SEAs are urged to have finished submitting accurate and complete data
April/May, 2020	Training for new state fiscal coordinators
July, 2020	Training for all state fiscal coordinators
August 15, 2020	Mandatory final submission date
September 3, 2020 (Tuesday following Labor day)	Response by SEA’s to requests for clarification, reconciliation, or other inquiries from NCES or Census. All data issues to be resolved by this date. Close NPEFS file on Tuesday following Labor Day. No files are accepted for program funding purposes after close-out.
December, 2020	Provisional files available for internal use but not publication
March, 2021	Provisional per-pupil expenditure data available
March/April, 2021	NCES review of files, file documentation, and short reports
June/July, 2021	Files become public and NCES web database updated

Thank you again for your comment and please do not hesitate to contact us with questions.

Sincerely,

Stephen Q. Cornman

[stephen.cornman@ed.gov](mailto:stephen.cornman@ed.gov)

Project Director

National Public Education Financial Survey (NPEFS)

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