

Private School Universe Survey (PSS) 2019-20 and 2021-22

Supporting Statement Part A

OMB# 1850-0641 v.13

Submitted by

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

October 2018
revised March 2020
second revision June 2020
third revision March 2021

SUPPORTING STATEMENT
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A. JUSTIFICATION

This request is to conduct the 2019-20 and 2021-22 Private School Universe Survey (PSS) data collections and the 2021-22 PSS frame-development activities. In March 2021, NCES resubmitted this package, materially unchanged from previous submissions, to request an extension for data collection activities. The current OMB clearance expires in April 2022, but data collection activities are currently scheduled to extend into late May 2022.

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, 2013-14, and 2015-16 and those data have been published (<http://nces.ed.gov/surveys/pss/>). The 2017-18 PSS data are currently being processed and are scheduled to be released in June 2019. NCES is authorized to conduct this survey under the Education Sciences Reform Act of 2002 (ESRA 2002, 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 2017-18 NTPS contained private schools and the 2019-20 NTPS will also contain them. 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 all PSS data collections since 2003-04, the data from all 2019-20 and 2021-22 paper questionnaires will be imaged and stored electronically. And, as in all previous PSS collections, CATI follow-up will be used in 2019-20 and 2021-22 for mail/internet nonrespondents (an estimated 18 percent of all responses will be collected by CATI). Furthermore, the 2019-20 and 2021-22 PSS, like all previous PSS administrations

starting in 2009-10, will offer an internet response option to all schools, except for Amish and Mennonite schools, which will not be offered an internet response option.

A4. Efforts to Identify Duplication

One of the criteria for PSS is to collect only data that are not available elsewhere. The Cross-sectional Survey Branch 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 (20 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
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

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
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 2017. The following private school groups were represented at the meeting:

United States Conference of Catholic Bishops
 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

Oral Roberts University
 Evangelical Lutheran Education Association
 National Independent Private School Association
 The Association of Christian and Classical Schools
 Islamic School League of America
 The Jewish Education Project
 Council of Islamic Schools in North America
 Wisconsin Evangelical Lutheran Synod
 National Christian School Association
 Association of Military Colleges and Schools of the US
 American Montessori Society

Greg Dolan
 Jamison Coppola
 George Tryfiates
 R. J. Nelson
 Joseph McTighe
 Amada Torres
 Dale McDonald
 National Christian School Association
 Philip Patterson
 Kim Boyd
 Gayle Denny
 Allan Blau
 David Goodwin
 Seema Imam
 Martin Schloss
 Sufia Azmat
 Scott Gostchock
 Kelly Moore
 Raymond Rottman
 Tracy Sulak

Both 60-day and 30-day Federal Register notices were published for this data collection. No public comments were received during the 60-day comment period.

A9. Payment or Gifts to Respondents

Not applicable.

A10. Assurance of Confidentiality

Data security and confidentiality protection procedures have been put in place for the 2019-20 and 2021-22 PSS to ensure that all contractors and agents working on 2019-20 and 2021-22 PSS comply with all privacy requirements including, as applicable:

1. The Inter-agency agreement with NCES for this study;
2. *Privacy Act of 1974* (5 U.S.C. §552a);
3. *Privacy Act Regulations* (34 CFR Part 5b);
4. *Computer Security Act of 1987*;
5. *U.S.A. Patriot Act of 2001* (P.L. 107-56);
6. *Education Sciences Reform Act of 2002* (ESRA 2002, 20 U.S.C. §9573);
7. *Confidential Information Protection and Statistical Efficiency Act of 2002*;
8. *E-Government Act of 2002*, Title V, Subtitle A;
9. *Cybersecurity Enhancement Act of 2015* (6 U.S.C. §151);
10. The U.S. Department of Education General Handbook for Information Technology Security General Support Systems and Major Applications Inventory Procedures (March 2005);
11. The U.S. Department of Education Incident Handling Procedures (February 2009);
12. The U.S. Department of Education, ACS Directive OM: 5-101, Contractor Employee Personnel Security Screenings;
13. NCES Statistical Standards; and
14. All new legislation that impacts the data collected through the inter-agency agreement for this study.

The U.S. Census Bureau will collect data under an interagency agreement with NCES, and maintain any individually identifiable information per the agreement, including:

1. Provisions for data collection in the field;
2. Provisions to protect the data-coding phase required before machine processing;
3. Provisions to safeguard completed survey documents;
4. Authorization procedures to access or obtain files containing identifying information; and
5. Provisions to remove printouts and other outputs that contain identification information from normal operation (such materials will be maintained in secured storage areas and will be securely destroyed as soon as practical).

U.S. Census Bureau and contractors working on the 2019-20 and 2021-22 PSS will comply with the Department of Education's IT security policy requirements as set forth in the Handbook for Information Assurance Security Policy and related procedures and guidance, as well as IT security requirements in the Federal Information Security Management Act (FISMA), Federal Information Processing Standards (FIPS) publications, Office of Management and Budget (OMB) Circulars, and the National Institute of Standards and Technology (NIST) standards and guidance. All data products and publications will also adhere to: the revised NCES Statistical Standards, as described at the website: <http://nces.ed.gov/statprog/2012/>.

By law (20 U.S.C. §9573), a violation of the confidentiality restrictions is a felony, punishable by imprisonment of up to 5 years and/or a fine of up to \$250,000. All government or contracted staff working on the NTPS study and having access to the data, including NTPS field staff, are required to sign an NCES Affidavit of Nondisclosure and have received public-trust security clearance. These requirements include the successful certification and accreditation of the system before it can be implemented. Appropriate memoranda of understanding and interconnection security agreements will be documented as part of the certification and accreditation process.

From the initial contact with the participants in this survey through all of the follow-up efforts, potential survey respondents will be informed that (a) the U.S. Census Bureau administers PSS on behalf of NCES; (b) NCES is authorized to conduct PSS by the Education Sciences Reform Act of 2002 (ESRA 2002, 20 U.S.C. §9543); and (c) that their participation is voluntary. The law does not require disclosure protection of institutions, such as schools, and thus no assurance of confidentiality will be provided to respondents.

The following language will be included in respondent contact materials and on data collection instruments:

The National Center for Education Statistics (NCES), within the U.S. Department of Education, conducts PSS as authorized by the Education Sciences Reform Act of 2002 (ESRA 2002, 20 U.S.C. §9543).

The data will be used to produce a web-based private school search tool and statistical summaries about the providers of private education in the United States.

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this voluntary information collection is 1850-0641. The time required to complete this information collection is estimated to average 20 minutes per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of the time estimate, suggestions for improving this collection, or comments or concerns about the contents or the status of your individual submission of this questionnaire, please e-mail: pss@census.gov, or write directly to: Private School Survey (PSS), National Center for Education Statistics, Potomac Center Plaza, 550 12th Street SW, Room #4176, Washington, DC 20202.

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

2019-20 and 2022-23 PSS data collections

For each, 2019-20 and 2022-23 PSS data collection, approximately 11,800 screener calls will be made to institutions discovered in the area-frame operation (see Supporting Statement Part B section B.2) to determine their eligibility for the PSS. The average length of these calls will be 3 minutes. Survey questionnaires will be sent to all of the cases within that year's 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.

2022-23 PSS Frame Development

During the development of the list-frame portion of the 2021-22 PSS universe (see Supporting Statement Part B section 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 about an hour. Approximately 22,330 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.

Based on the estimated hourly rate for school administrators of \$46.85⁰, and based on 6,577 average annual burden hours for PSS activities, the total estimated annual burden time cost to respondents is \$308,132.

2019-20 and 2021-22 PSS Data Collection and 2021-22 PSS Frame Development Burden Estimate

Document Type	Sample Size	Estimated Response Rate	Respondents per Administration	Responses	Time per Response (min)	Total Burden Hours
State School List Request Letter	70	100%	70	70	60	70
Association School List Request Letter	30	100%	30	30	60	30
School Eligibility Telephone Script (list-frame)	22,330	100%	22,330	22,330	3	1,117
2021-22 List Frame Development Total	-	-	22,430	22,430	-	1,217
School Eligibility Telephone Script (area-frame)	11,800	100%	11,800	11,800	3	590
School Questionnaire	30,560	85.08%	26,000	26,000	20	8,667
Data Collection Administrations Subtotal	-	-	26,000*	37,800	-	9,257
2019-20 & 2021-22 Data Collection Total	-	-	52,000	75,600	-	18,514
Total Burden	-	-	74,430	98,030	-	19,731
Average Annual Burden	-	-	24,810	32,677	-	6,577

* Unduplicated count of contacted respondents.

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 PSS 2021-22 is approximately **\$5,200,000** (\$455,000 in FY 2020; \$1,624,000 in FY 2021; \$2,700,000 in FY 2022; and \$421,000 in FY 2023) and, for the portion of PSS 2019-20 covered by this clearance it is approximately **\$3,809,811** (\$725,196 in FY 2019; \$2,694,000 in FY20; and \$390,615 in FY 21). 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 2019-20 and 2021-22 collections over the three year period is **\$3,003,270**.

A15. Changes in Burden

While there is no change in the burden per respondent from the last approved PSS administration, the estimated number of screener calls has increased for both list-frame and area-frame schools (this is caused by

⁰ Source: BLS Occupation Employment Statistics, <http://data.bls.gov/oes/> datatype: Occupation codes Education Administrators (11-9032); accessed on May 18, 2018.

lists of private schools we receive from private school organizations and states having on average less information than in the past, necessitating more screener calls to potential new schools). However, this is more than offset by a decrease in the number of expected PSS survey respondents from the last approved PSS administration (this decrease in expected PSS respondents is based on the 2013-14, 2015-16, and 2017-18 response rates and reflects the increasing reluctance of private schools to respond to PSS), and thus the overall annual burden for PSS has decreased.

A16. Publication Plans/Time Schedule

2019-20 PSS

The first mailing of questionnaires (web invitation or paper questionnaire) is scheduled for October 1, 2019 (see Appendix C-2). A second mailout (paper questionnaire only) for schools that did not respond to the first mailout is scheduled for October 15, 2019. A third mailout (paper questionnaire) for schools that did not respond to the first or second mailouts is scheduled for October 28, 2019. Telephone follow-up for nonresponse will begin in January 2020. Emails (web invitation) to CATI noninterviews are scheduled to be sent out on April 15th, May 6th, May 20th, and June 9th. Personal visit follow-up for mail/internet noninterviews is scheduled for January 2020.

The 2019-20 PSS survey is being conducted according to the following time schedule:

Request Private School Lists	7/5/2018
Conduct Screener Calls for List-Frame Schools	8/13/2018-3/4/2019
Conduct Screener Calls for Area-Frame Schools	9/5/2019-9/30/2019
1 st Survey Mailout (Web invitation or paper questionnaire)	10/1/2019
2 nd Survey Mailout (Paper questionnaire only)	10/15/2019
3 rd Survey Mailout (Paper questionnaire only)	10/28/2019
CATI/Field Followup	1/13/2020-5/29/2020
Emails to CATI Nonrespondents	4/15/2020, 5/6//2020, 5/20/2020, and 6/9/2020
Check-in, Clerical Edit	10/1/2019-7/2020
Process Data	7/2020-10/2020
Final File	11/2020
NCES Reports Results	5/2021

2021-22 PSS

The first mailing of questionnaires (web invitation or paper questionnaire) is scheduled for October 4, 2021 (see Appendix C-2). A second mailout (paper questionnaire only) for schools that did not respond to the first mailout is scheduled for October 18, 2021. A third mailout (paper questionnaire) for schools that did not respond to the first or second mailouts is scheduled for November 1, 2021. Telephone follow-up for nonresponse will begin in January 2022. Personal visit follow-up for mail/internet noninterviews and CATI noninterviews is scheduled for January 2022 through May 2022.

The 2021-22 PSS survey will be conducted according to the following time schedule:

Request Private School Lists	7/6/2020
Conduct Screener Calls for List-Frame Schools	8/17/2020-3/5/2021
Conduct Screener Calls for Area-Frame Schools	9/6/2021-9/30/2021
1 st Survey Mailout (Web invitation or paper questionnaire)	10/4/2021
2 nd Survey Mailout (Paper questionnaire only)	10/18/2021
3 rd Survey Mailout (Paper questionnaire only)	11/1/2021
CATI/Field Followup	1/13/2022-5/27/2022
Check-in, Clerical Edit	10/4/2021-6/2022
Process Data	7/2022-10/2022
Final File	11/2022
NCES Reports Results	5/2023

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 *Characteristics of Private Schools in the United States: Results From the 2015-16:Private School Universe Survey, NCES 2017-073*, which can be accessed from the PSS web page at <http://nces.ed.gov/surveys/pss>. NCES will publish the 2019-20 survey results in May 2021 and the 2021-22 survey results in May 2023.

A17. Request Not to Display Expiration Date

Not applicable.

A18. Exceptions to the Certifications

Not applicable.