August 31, 2021

**MEMORANDUM**

To: Dominic Mancini, Acting Administrator, Office of Information and Regulatory Affairs

From: Peggy Carr, NCES

Through: Carrie Clarady, NCES

Re: Requested Emergency Clearance for School Pulse Panel Data Collection

The purpose of this memo is to demonstrate the need for emergency review under [5 CFR 1320.13(a)](https://ecfr.federalregister.gov/current/title-5/chapter-III/subchapter-B/part-1320/section-1320.13) to collect voluntary responses from a nationally representative sample of public schools to better understand how schools, students, and educators are responding to the ongoing stressors of the coronavirus pandemic. This is the second of two emergency requests that will be required to allow the new School Pulse Panel study to begin data collection on time to satisfy the requirements of EO 14000.

NCES requests emergency clearance to allow us to comply with the January 21, 2021 EO 14000 [Executive Order on Supporting the Reopening and Continuing Operation of Schools and Early Childhood Education Providers](https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/21/executive-order-supporting-the-reopening-and-continuing-operation-of-schools-and-early-childhood-education-providers/) which states that the Secretary of Education must “coordinate with the Director of the Institute of Education Sciences to facilitate, consistent with applicable law, the collection of data necessary to fully understand the impact of the COVID-19 pandemic on students and educators, including data on the status of in-person learning. These data shall be disaggregated by student demographics, including race, ethnicity, disability, English-language-learner status, and free or reduced lunch status or other appropriate indicators of family income.” NCES first addressed these research needs with the National Assessment of Education Progress (NAEP) 2021 School Survey (OMB# 1850-0957), which was fielded in the first half of 2021. This NAEP 2021 School Survey met the need of Executive Order 14000 by using an existing sample and survey data collection infrastructure to quickly collect information on instructional mode offerings and enrollment counts of various subgroups of students using the various instructional modes. The School Pulse Panel intends to continue to collect this critical information, along with other priority items for the White House, Centers for Disease Control and Prevention, and Department of Education program offices, throughout the 2021-22 school year. Normal clearance procedures would not allow IES to comply with the intent of this EO. NCES will publish a Federal Register Notice soliciting 30 days of public comment on this collection concurrent with data collection.

In order to extend this research beyond the 6 months allowed for research activities cleared under [5 CFR 1320.13(a)](https://ecfr.federalregister.gov/current/title-5/chapter-III/subchapter-B/part-1320/section-1320.13), NCES will simultaneously publish a Federal Register Notice soliciting both 60-day and 30-day public comment on this collection concurrent with data collection. Furthermore, we anticipate that new content will be rotated in (and some rotated out) on a quarterly basis. Therefore, we plan to add proposed new content to be collected in the second quarter (December through February) to that review as part of the 30-day public comment period. Moving forward, we plan to submit each quarterly instrument to OMB for 30-day public comment and review following the testing of proposed items.

The National Center for Education Statistics (NCES), in the Institute of Education Sciences of the U.S. Department of Education, will oversee the survey collection, which is designed to collect vital data with the least possible burden on schools. With the voluntary participation of educators and school leaders across the country, NCES will be able to report the national-level percentages of students who received instruction remotely, in-person, or in a hybrid instructional mode, as well as other important topics of interest that are related to COVID-19 impacts on the school environment. NCES will provide these data for various student groups in an online dashboard.

**Data gathered in the first quarterly collections will include:**

* Instruction modes offered in 2021-22;
* Enrollment counts and attendance rates by instructional mode by race/ethnicity, socio-economic status, English learner status, and disability status;
* Mitigation strategies to reduce the spread of COVID-19 and to address pandemic-related learning needs;
* Vaccination information;
* Use of technology, computer devices, and internet access;
* Mental health services provided; and
* Staffing

**Additional content areas for future quarterly collections may include:**

* Staff perceptions of established mandates;
* Tracking of enrollment (especially for children with disabilities) over time to look for fluctuations in counts;
* Decisions behind instructional mode offerings for students;
* Impact of pandemic on school lunch programs;
* Other currently unforeseen areas of questioning as directed by leaders and policy-makers, related to the ongoing impact of the global coronavirus pandemic on schools and educational systems.

About 1200 public elementary, middle, high, and combined-grade schools were initially selected to participate in a panel where school staff will be asked to provide requested data monthly during the 2021-22 school years. In addition, a reserve sample of replacement schools was selected to boost the number of responses if any schools from the initial sample do not respond. This approach provides the ability to collect detailed information on various topics while also assessing changes in reopening efforts over time. Given the high demand for data collection during this time, the content of the survey may change on a quarterly basis.

Simultaneous to this emergency request to conduct the monthly collections of data from sampled schools in Fall 2021, NCES will submit a regular clearance package through the normal clearance procedures, complete with the attendant 60- and 30-Day public comment periods, in order to collect data throughout the 2021-2022 school year. Furthermore, it is anticipated for some new content to be rotated in (and some rotated out) on a quarterly basis. Therefore, we plan for proposed new content to be collected in the second quarter (December through February) to be added as part of the 30-day public comment period. We plan to utilize this schedule of having proposed new content to be submitted for 30-day public comment period for each subsequent quarterly collection.