

Private School Universe Survey (PSS) 2023-24 Data Collection, and 2023-24 and 2025-26 PSS Frame Development Activities

Supporting Statement Part A

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Submitted by

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

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SUPPORTING STATEMENT
TABLE OF CONTENTS

A. JUSTIFICATION.....2

- A1. Importance of Information.....2
- A2. Purpose and Uses of the Data.....2
- A3. Appropriate Use of Information Technology.....2
- A4. Efforts to Identify Duplication.....3
- A5. Small Business or Entities.....3
- A6. Frequency of Data Collection.....3
- A7. Special Circumstances of Data Collection.....3
- A8. Consultations Outside the Agency.....3
- A9. Payment or Gifts to Respondents.....4
- A10. Assurance of Confidentiality.....4
- A11. Need for the Use of Sensitive Questions.....5
- A12. Estimates of Information Collection Burden.....5
- A13. Capital and Operating Costs to Respondents.....6
- A14. Estimates of Cost to the Federal Government.....6
- A15. Changes in Burden.....6
- A16. Publication Plans/Time Schedule.....7
- A17. Request Not to Display Expiration Date.....8
- A18. Exceptions to the Certifications.....8

- Appendix A. State List Request Letter**
- Appendix B. Association List Request Letter**
- Appendix C. School Communication Materials**
- Appendix D. PSS Questionnaire**

A. JUSTIFICATION

This request is to conduct the 2023-24 Private School Universe Survey (PSS) data collections and the 2023-24 and 2025-26 PSS frame-development activities.

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 23 percent of all elementary and secondary schools in the United States and enroll an estimated 9 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, 2015-16 2017-18 and 2019-20 and those data have been published (<http://nces.ed.gov/surveys/pss/>). The 2021-22 PSS is currently being collected. 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 and 2020-21 NTPS contained private schools. 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 2023-24 paper questionnaires will be imaged and stored electronically. And, as in all previous PSS collections, CATI follow-up will be used in 2023-24 for mail/internet nonrespondents (an estimated 20 percent of all responses will be collected by CATI). Furthermore, the 2023-24 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.

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

The Department recently included notice for the public to provide comments under a 60-day comment period, for which one comment was received and addressed in the attached document “PSS 2023-2026 Response to 60-day Public Comments”.

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

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

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 February 2021. The following private school groups were represented at the meeting:

| | |
|--|---------------------------------------|
| American Association of Christian Schools | Hanna Debrue |
| Association of Christian Schools International | George Tryfiates |
| Association of Christian Teachers and Schools | R. J. Nelson |
| Council for American Private Education | Michael Schattloffel |
| National Association of Independent Schools | Amada Torres |
| National Catholic Educational Association | Dale McDonald |
| | National Christian School Association |
| | Philip Patterson |
| Oral Roberts University | Kim Boyd |
| Evangelical Lutheran Education Association | Gayle Denny |
| National Independent Private School Association | Allan Blau |
| The Association of Christian and Classical Schools | David Goodwin |
| Islamic School League of America | Isra Brifkam |
| The Jewish Education Project | Martin Schloss |
| Council of Islamic Schools in North America | Sufia Azmat |
| Wisconsin Evangelical Lutheran Synod | Scott Gostchock |
| National Christian School Association | Kelly Moore |
| Association of Military Colleges and Schools of the US | Raymond Rottman |
| American Montessori Society | Tracy Sulak |

A9. Payment or Gifts to Respondents

No payments or gifts are offered to respondents as part of this data collection.

A10. Assurance of Confidentiality

Data security and confidentiality protection procedures have been put in place for the 2023-24 and 2024-25 PSS to ensure that all contractors and agents working on 2023-24 and 2025-26 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 2023-24 and 2025-26 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 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

2023-24 PSS data collection

For the 2023-24 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 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.

2023-24 & 2025-26 PSS Frame Development

During the development of the list-frame portion of the 2023-24 & 2025-26 PSS universes (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 44,660 screener calls will be made to institutions discovered in the two 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 \$49.52⁰, and based on 3,897 average annual burden hours for PSS activities, the total estimated annual burden time cost to respondents is \$192,979.

2023-24 PSS Data Collection, and 2023-24 & 2025-26 PSS Frame Development Burden Estimate

| Document Type | Sample Size | Estimated Response Rate | Respondents per Administration | Responses | Time per Response (min) | Total Burden Hours |
|---|-------------|-------------------------|--------------------------------|---------------|-------------------------|--------------------|
| <i>Frame Development Activities</i> | | | | | | |
| 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 |
| List-Frame Development Subtotal | - | - | 22,430 | 22,430 | | 1,217 |
| 2023-24 & 2025-26 List-Frame Development Total | - | - | 44,860 | 44,860 | - | 2,434 |
| <i>Biennial Data Collection Activities</i> | | | | | | |
| School Eligibility Telephone Script (area-frame) | 11,800 | 100% | 11,800 | 11,800 | 3 | 590 |
| School Questionnaire | 30,600 | 85.08% | 26,000 | 26,000 | 20 | 8,667 |
| 2023-24 Data Collection Total | - | - | 26,000* | 37,800 | - | 9,257 |
| Total Burden | - | - | 70,860 | 82,660 | - | 11,691 |
| Average Annual Burden | - | - | 23,620 | 27,553 | - | 3,897 |

* 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 2023-24 is approximately **\$5,796,000** and, for the portion of PSS 2025-26 covered by this clearance it is approximately **\$2,048,000**. 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 2023-24 PSS and 2025-26 PSS frame activities over the three-year period is **\$2,615,000**.

⁰ Source: BLS Occupation Employment Statistics, <http://data.bls.gov/oes/> datatype: Occupation codes Education Administrators (11-9032); accessed on January 17, 2022. Calculated based on the cited mean annual wage of \$103,010 and 2,080 hours for “year-round, full-time” employment.

A15. Changes in Burden

While there is no change in the burden per respondent from the last approved PSS administration, the total estimated burden has decreased because there is only one survey collection contained in this three-year period covered by this clearance, while there were two survey collections contained in the last three-year clearance.

A16. Publication Plans/Time Schedule

2023-24 PSS

The first mailing of questionnaires (web invitation only) for non-Amish and non-Mennonite schools is scheduled for September 18, 2023 (see Appendix C-2). A second mailout (web invitation and/or paper questionnaire) is scheduled for September 25, 2019. A third mailout (web invitation and/or paper questionnaire) for schools that did not respond to the first or second mailouts is scheduled for October 9, 2023. Telephone follow-up for nonresponse will begin in January 2024. Personal visit follow-up for mail/internet noninterviews and CATI noninterviews is scheduled for January 2024 through May 2024. Five Email reminders will be sent to nonrespondents; post survey mailout, pre-CATI follow-up, post CATI follow-up, pre-field follow-up, and a final reminder.

The 2023-24 PSS survey is being conducted according to the following time schedule:

| | |
|---|---------------------|
| Request Private School Lists | 7/5/2022 |
| Conduct Screener Calls for List-Frame Schools | 8/22/2022-3/3/2023 |
| Conduct Screener Calls for Area-Frame Schools | 9/4/2023-9/29/2023 |
| Production Deployment or Internet Instrument | 9/18/2023-6/8/2024 |
| 1 st Survey Mailout (web invitation) to non-Amish and Mennonite Schools) | 9/18/2023 |
| 2 nd Survey Mailout (web invitation and/or paper questionnaire) | 9/25/2023 |
| 3 rd Survey Mailout (web invitation and/or paper questionnaire) | 10/9/2023 |
| Reminder/Thank You Postcard Mailout | 11/13/2023 |
| Post Mailout Email Reminder | 12/4/2023 |
| Pre-CATI Email Reminder | 12/18/2023 |
| CATI/Field Follow-up | 1/15/2024-5/27/2024 |
| Post CATI Email reminder | 3/11/2024 |
| Pre-Field Follow-up Email Reminder | 3/25/2024 |
| Final Email Reminder | 4/29/2024 |
| Check-in, Clerical Edit | 9/18/2023-6/2024 |
| Process Data | 7/2024-10/2024 |
| Final File | 11/2024 |
| NCES Reports Results | 5/2025 |

2025-26 PSS

The 2025-26 PSS frame activities will be conducted according to the following time schedule:

| | |
|---|--------------------|
| Request Private School Lists | 7/7/2024 |
| Conduct Screener Calls for List-Frame Schools | 8/19/2024-3/9/2025 |

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/middle, secondary/high, combined/other). See *Characteristics of Private Schools in the United States: Results From the 2019-20: Private School Universe Survey, NCES 2021-061*, which can be accessed from the PSS web page at <http://nces.ed.gov/surveys/pss>. NCES will publish the 2021-22 survey results in May 2023.

A17. Request Not to Display Expiration Date

The Department is not seeking this approval.

A18. Exceptions to the Certifications

The Department is not requesting any exceptions to the "Certification for Paperwork Reduction Act Submissions".