May 9, 2022

**MEMORANDUM**

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

From: Peggy Carr, Commissioner, NCES

Through: Carrie Clarady, NCES

Re: Program for the International Assessment of Adult Competencies (PIAAC) Cycle II 2022

Main Study Tribal Communications Emergency Request

The primary purpose of this memo is to demonstrate the need for an emergency review under 5 CFR 1320.13(a) of new contact and recruitment materials to contact six Native American tribal leaders. The need for immediate clearance is due to the time sensitivity of these communications, as these relationships take time to establish and PIAAC 2022 is due to begin data collection in September 2022. Normal clearance procedures would not allow NCES to follow the mandates set by the sponsoring international organization and make the required changes to the data collection while also respecting the timeline specified for this data collection.

The Program for the International Assessment of Adult Competencies (PIAAC) is a cyclical, large-scale study of adult skills and life experiences focusing on education and employment. PIAAC is an international study designed to assess adults in different countries over a broad range of abilities, from simple reading to complex problem-solving skills, and to collect information on individuals’ skill use and background. The U.S. will administer the PIAAC 2022 assessment to a nationally representative sample of adults, along with a background questionnaire with questions about their education background, work history, the skills they use on the job and at home, their civic engagement, and sense of their health and well-being. The results are used to compare the skills capacities of the workforce-aged adults in participating countries, and to learn more about relationships between educational background, employment, and other outcomes. PIAAC is coordinated by the Organization for Economic Cooperation and Development (OECD) and developed by participating countries with the support of the OECD. In the United States, the National Center for Education Statistics (NCES), within the U.S. Department of Education (ED) conducts PIAAC. NCES has contracted with Westat to administer the PIAAC Cycle II Field Test data collection in the U.S. The United States participated in the PIAAC Main Study data collection in 2012 and conducted national supplement data collections in 2014 and 2017. All three of these collections are part of PIAAC Cycle I, in which 39 countries participated (24 countries in 2012, 9 new countries in 2014, and 5 more new countries in 2017) with close to 200,000 adults assessed across the 39 countries over the three data collections. A new PIAAC cycle is to be conducted internationally every 10 years, and PIAAC Cycle II Main Study data collection will be conducted from September 2022 through April 2023.

In preparation for the main study collection, PIAAC Cycle II began with an Operational Field Test in 2021, in which 32 countries are expected to participate with the primary goal of testing the PIAAC 2022 planned operations (OMB# 1850-0870 v.10). In February 2022, NCES published a Federal Register Notice soliciting 60 days of public comment on the materials for the PIAAC Cycle II 2022 Main Study ([87 FR 9330-9331](https://www.federalregister.gov/documents/2022/02/18/2022-03543/agency-information-collection-activities-comment-request-program-for-the-international-assessment-of)). Upon clearance of this Emergency Submission, the materials contained herein will be added to the package of materials for the PIAAC Cycle II 2022 Main Study, and a Federal Register Notice soliciting an additional 30 days of public comment will be published. That final submission (OMB# 1850-0870 v.11) will describe the complete and final plans for the administration of the PIAAC Cycle II 2022 Main Study. For that reason, NCES will not publish a Federal Register Notice soliciting comment solely on this single letter.

This extremely time-sensitive situation has arisen because, for the first time, part of PIAAC’s U.S. sample for this administration is in tribal lands and territories, and so NCES needs to ask permission and cooperation to enter and collect data in those areas. At the time of the 60-day submission, the primary sampling unit (PSU) selection process had not yet begun. Once the PSUs and secondary sampling units (SSUs) were selected, the geographies were overlaid with information on tribal areas revealing that six tribal territories fell into the sample. The higher-than-expected number of PSUs in tribal territories may be due in part to the augmented Cycle II sample design which facilitates small area estimates and includes at least two PSUs in every state.

NCES is requesting clearance by Monday, May 16 in order to immediately mail these letters to sampled recipients.