

# Public Comments Received During the 60-day Comment Period

October 2022

## National Teacher and Principal Survey of 2023-2024 (NTPS 2023-24)

ED-2022-SCC-0100

Comments on FR Doc # 2022-16459

*NCES and the staff of The National Teacher and Principal Survey want to thank all public commenters for your feedback responding to a request for comments on NTPS 2023-24 published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in our work. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made. We are grateful for this process and your comment and hope that you will continue to follow our work.*

**Document:** ED-2022-SCC-0100-0006

**Name:** Gabrielle Doyle, Advocacy Campaign Manager, The Trevor Project

The Trevor Project is pleased to submit this comment in response to the proposed National Teacher and Principal Survey of 2023–2024 (NTPS 2023–24) Preliminary Field Activities by the National Center for Education Statistics regarding issue (4), how might the Department enhance the quality, utility, and clarity of the information to be collected. The proposed survey provides an invaluable opportunity to gain insight on the experiences and recommendations of educators and principals nationwide. There is a significant opportunity to advance the quality of the school, principal, and teacher questionnaire to better reflect how lesbian, gay, bisexual, transgender, queer, and questioning (LGBTQ) youth are represented and affirmed within their school environments. Further advancement is also necessary to better understand how prepared school professionals are to respond to suicidality among all youth.

The Trevor Project is the world’s largest suicide prevention and mental health organization for LGBTQ young people. We offer a suite of 24/7 crisis intervention and suicide prevention programs, including TrevorLifeline, TrevorText, and TrevorChat as well as the world’s largest safe space social networking site for LGBTQ youth, TrevorSpace.

According to The Trevor Project’s 2022 National Survey on LGBTQ Youth Mental Health, 45% of LGBTQ youth seriously considered attempting suicide in the past year, including more than half of transgender and nonbinary youth.<sup>1</sup> This devastating statistic is not intrinsically tied to holding an LGBTQ identity, but rather due to the persistent and pervasive forms of systemic discrimination and violence that LGBTQ youth experience. LGBTQ youth who had access to spaces that affirmed their sexual orientation and gender identity — including schools — reported lower rates of attempting suicide than those who did not. It is for this reason that collecting data on educator and principal perceptions of their school climate is essential to better understand the status of LGBTQ affirming school environments nationwide. The below points emphasize specific questions currently included in the draft questionnaires.<sup>2</sup>

### I. Principal Questionnaire

#### A. 2. GOALS AND DECISION MAKING

1. 2-1 currently asks about the importance principals place on various educational goals from a list of ten goals. Goal 9 states “Promoting multicultural awareness or understanding”. To further clarify the meaning of multicultural awareness it is recommended to expand upon this option to read:

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<sup>1</sup> <https://www.thetrevorproject.org/survey-2022/>

<sup>2</sup> <https://www.regulations.gov/document/ED-2022-SCC-0100-0003>

“Promoting multicultural awareness of understanding based upon race, color, religion, national origin, sexual orientation, gender identity, or ability”. This improvement will support a more nuanced understanding of what ‘multicultural’ can mean to a principal and broader school community.

### B. 3. SCHOOL CLIMATE AND SAFETY

1. 3-1 currently asks principals about how often specific types of problems occur at their school. To ensure that the full spectrum of types of problems that can occur in schools is represented, it’s essential to explicitly address discrimination based on sexual orientation and gender identity. The following types of problems may be included in the proposed list:

- a) Student bullying based on sexual orientation
- b) Student bullying based on gender identity
- c) Teacher acts of disrespect toward students based on sexual orientation or gender identity
- d) Teacher acts of disrespect towards students based on race, color, or national origin
- e) Physical conflicts perpetuated by school resource officers against students based on sexual orientation or gender identity
- f) Physical conflicts perpetuated by school resource officers against students based on race, color, or national origin
- g) Verbal conflicts perpetuated by school resource officers against students based on sexual orientation or gender identity
- h) Verbal conflicts perpetuated by school resource officers against students based on race, color, or national origin

### C. 9. PRINCIPAL DEMOGRAPHIC INFORMATION

1. The current proposed demographic questions proposed in 9-1 through 9-5 fail to capture the diverse identities of principals nationwide. To collect more accurate data on the identities of LGBTQ principals nationwide, The Trevor Project recommends the inclusion of expansive questions related to sexual orientation and gender identity as included in the 2023-24 National Teacher and Principal Survey (NTPS) Cognitive/Usability Testing Attachment 3: Teacher Questionnaires (Public and Private.)<sup>3</sup>

D. The above recommendations equally apply to the Private School Principal Questionnaire.

## II. School Questionnaire

### A. 1. GENERAL INFORMATION ABOUT THIS SCHOOL

1. 1-16 currently asks which before-school or after-school programs or services are currently available for students in any grades K-12. While 1-16d lists school related activities and gives the examples of yearbook club and the school dance committee, it’s necessary to include the example of a Gender and Sexuality Alliance (GSA)<sup>4</sup>. If the respondent answers yes, they should be prompted to “GO TO item 1-16e” nested question to answer if a Gender and Sexuality Alliance is currently available for students. This information provides key insight on the availability of school-based resources and supports available for LGBTQ youth, which plays an essential role in maintaining

<sup>3</sup> <https://www.reginfo.gov/public/do/DownloadDocument?objectID=119633901>

<sup>4</sup> <https://gsanetwork.org/what-is-a-gsa/>

their mental health and wellbeing. Students who have a GSA in their school are less likely to hear “gay” used in a negative way, homophobic remarks, negative remarks about gender expression, report feeling unsafe, and more likely to report a greater number of supportive school staff and accepting peers.<sup>5</sup>

B. The above recommendation equally applies to the Private School Questionnaire.

### III. Teacher Questionnaire

#### A. 3. EDUCATION AND TRAINING

1. 3-6 currently asks teachers if they took any graduate or undergraduate courses that taught them specific topics. 3-6e asks if they took a course on how to serve students from diverse economic backgrounds. To further understand the scope of education a teacher received to be culturally responsive to the needs of marginalized students, it’s essential to expand this question set. These additional questions may be phrased as:

- a) How to serve students from diverse racial backgrounds?
- b) How to serve students who hold diverse sexual orientations and gender identities?

#### B. 6. TEACHER PROFESSIONAL DEVELOPMENT

1. 6-2 currently asks teachers to detail the varying types of professional development they received during the past 12 months. To better understand how educators are trained to respond to suicidality among youth and their cultural competency in working with LGBTQ youth. While these topics may be addressed in 6-7 under future professional development opportunities, the explicit inclusion of the below topics will result in quantifiable data on the provision of professional development opportunities related to suicide prevention and teaching LGBTQ youth. These questions, with the current response opportunities included in the questionnaire, may be phrased as:

- a) Professional development on prevention, intervention, and postvention measures to address suicidality among students
- b) Professional development on cultural competency to act in allyship with LGBTQ students
- c) Professional development on cultural competency to act in allyship with Black, Indigenous, and other students of color

#### C. 8. GENERAL EMPLOYMENT AND BACKGROUND INFORMATION

1. Similar to the Principal Questionnaire, 8-11, which asks respondents if they’re male or female, fails to capture the diverse identities of teachers nationwide. To collect more accurate data on the identities of LGBTQ teachers, The Trevor Project recommends the inclusion of expansive questions related to sexual orientation and gender identity as included in the 2023-24 National Teacher and Principal Survey (NTPS) Cognitive/Usability Testing Attachment 3: Teacher Questionnaires (Public and Private).<sup>6</sup>

D. The above recommendations equally apply to the Private School Teacher Questionnaire.

Through submitting this comment, The Trevor Project aims to support the advancement of the National Teacher and Principal Survey of 2023–2024 to be more inclusive and responsive to the needs and realities of LGBTQ teachers and students. Through the adoption of the proposed revisions, the National Center for Education Statistics will collect insightful data on the status of LGBTQ inclusive schools and the evidence needed to

<sup>5</sup> [https://www.glsen.org/sites/default/files/2021-04/NSCS19-FullReport-032421-Web\\_0.pdf](https://www.glsen.org/sites/default/files/2021-04/NSCS19-FullReport-032421-Web_0.pdf)

<sup>6</sup> <https://www.reginfo.gov/public/do/DownloadDocument?objectID=119633901>

advance meaningful policy change nationwide. Schools that affirm the unique needs of LGBTQ youth begin with educators and school professionals that are adequately prepared to support their LGBTQ staff and students. LGBTQ youth should be able to thrive in schools that are supportive and affirming of all students. Should you have any questions or if we can be of any assistance regarding this matter, please do not hesitate to contact me at [gabby.doyle@thetrevorproject.org](mailto:gabby.doyle@thetrevorproject.org).

Gabrielle Doyle  
Advocacy Campaign Manager  
The Trevor Project

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Dear Ms. Doyle,

Regarding principal and teacher demographics and the potential collection of data on sexual orientation and gender identity on the NTPS, we will share the results of cognitive and field tests at the 2022 Federal Committee on Statistical Methodology (FCSM) Research and Policy Conference on October 25, 2022. Those findings will inform our final questionnaires for public and private school principals and teachers for the 2023-24 NTPS.

We typically conduct cognitive interviews or other qualitative research before revising or creating new survey items, particularly for questions that have been fielded in multiple cycles of NTPS or its predecessor, the Schools and Staffing Survey (SASS), such as question 2-1 on the Principal Questionnaire. For new items or sub-items, we consider whether we will increase the survey length and respondent burden. We will consider conducting cognitive testing for a future cycle of NTPS for some of the suggested Principal and Teacher Questionnaire items, but do not plan to add them for the 2023–2024 collection.

Please note that several of the suggested items on climate and school programs are similar to questions asked in the School Survey on Crime and Safety (SSOCS). SSOCS was most recently collected in the spring of 2022, however, no future collections are planned.

Thank you for your comment and your ongoing interest in NTPS and the work at NCES.

Sincerely,  
Maura Spiegelman  
National Teacher and Principal Survey  
Cross-Sectional Surveys Branch  
National Center for Education Statistics  
U.S. Department of Education  
Office: 202-245-6581

**Document:** ED-2022-SCC-0100-0007

**Name:** Danielle R. Gilmore, Ph.D. Candidate, Program Evaluation, Graduate Research Assistant

Dear Ms. Valentine,

I am pleased to respond to the Federal Register notice of August 2, 2022, concerning the Department of Education's (Department) request for comments on the information collection request (ICR) for the National Teacher and Principal Survey of 2023-2024 (NTPS 2023-24). The Department is especially interested in public comment addressing the following issues: (1) is this collection necessary to the proper functions of the Department; (2) will this information be processed and used in a timely manner; (3) is the estimate of burden accurate; (4) how might the Department enhance the quality, utility, and clarity of the information to be collected; and (5) how might the Department minimize the burden of this collection on the respondents, including through the use of information technology. As a Ph.D. candidate at George Washington University and a graduate research assistant for the George Washington Institute of Public Policy, I focus on utilizing the lived experiences of educators to inform and enhance kindergarten through 12th grade (K12) education. From this perspective, I find that NTPS 2023-24 is highly important to the nation's education because data inform education policy and research. Given the high importance, I utilize my expertise to critically examine the ICR so that the Department may enhance the quality, utility, and clarity of the information collected.

NTPS 2023-24 provides nationally representative data of K12 schools, teachers, and principals. Topics covered include characteristics of teachers, principals, schools, teacher training opportunities, retention, retirement, hiring, and shortages. In education, representation is especially important because there is no one-size-fits-all solution. All districts ultimately benefit when good data help legislators and administrators make good decisions. By participating in this survey, participants ensure that information about their district's schools, principals, and teachers is included in those decisions. Education researchers and policymakers need high-quality representative data to inform future education policies that serve an equally diverse nation. Additionally, the longitudinal components provide vital information about teacher and principal retention and attrition. NTPS is the only national survey that provides this kind of information. The data they provide will better inform and help to shape future education policies.

I believe it is important that the NTPS 2023-24 utilize high-validity instruments to ensure a more precise measurement of the various topics of interest included in the questionnaires. Consequently, I ask the Department to consider my comments included on the following page as an effort to ensure such validation. I present considerations for the Department to improve data quality. I appreciate the opportunity to comment on the National Teacher and Principal Survey of 2023-2024 (NTPS 2023-24), hope that my suggestion is useful, and look forward to seeing the Department of Education's survey design decisions. I am available to speak about my suggestions if needed.

Sincerely,

Danielle R. Gilmore  
Ph.D. Candidate, Program Evaluation  
Graduate Research Assistant

**2023-24 NTPS Survey Commentary**

- To ensure high response rates and data quality, it is important to assess participants' feasibility, especially for NTPS. In a school, teachers often have the least amount of free time during the day to teach classes, develop lesson plans, and grade papers. Yet, the estimated average response time for teachers (80-100 minutes) is significantly longer than that for the school (13 minutes) or principal (25-30 minutes) questionnaires. Please consider reducing the number of questions to limit the teacher burden. It is important to ask: how will we use the data and are there other places to get it (e.g., administrative records, staff evaluations)?
- The NTPS communication documents are not written to the appropriate reading level. All publicfacing materials should be at an eighth-grade reading level. Please consider using the standardized Flesch Kincaid Grade Level Readability Test to determine documents' reading levels.
- NTPS mentioned it tested the use of incentives to increase response among teachers. According to NTPS, the incentives significantly increased response rates for both public and private teachers and reduced the average number of days to complete the questionnaire. NTPS has indicated they plan to offer teachers an incentive for 2020-21. However, the benefits of participation do not include incentive information. Please consider including incentive information. Currently, there is a section on "Why participate in NTPS?" however this is focused on the benefits to society that occur because of participation. There is no discussion of the benefits to the survey participants.
- The NTPS questionnaires include "basic descriptive information on the respondent." Individual information currently includes gender, age, and race/ethnicity. Such data allows for better understanding among subsets of the population, especially from historically underrepresented groups. However, disability status, bilingual status, and sexual orientation are not included. These are important identities to include to learn ways to better teach students with disabilities, students who are English Language Learners (ELL), and LGBTQ+ students. Additionally, gender demographic information is binary and only includes males and females. Please consider adding non-binary and other to enhance representation for those who do not identify as male or female. Demographic information on race does not include individuals of Middle Eastern or North African or (MENA) descent. Please consider including the option to allow for a better understanding of MENA educators and students.
- The NTPS school questionnaire includes a measure for "average daily attendance." Studies have shown that average daily attendance rates can mask chronic absenteeism within schools (Attendance Works, 2016; Attendance Works & Everyone Graduates Center, 2017; Bai et al., 2018; Balfanz et al., 2016; Buckingham et al., 2013; Chang & Works, 2013). Daily attendance rates do not provide the full picture of attendance because schools can have 90% daily occupancy and still have a quarter of students chronically absent since different students miss on different days.
- The Teacher Listing Form (TLF) collected by the NTPS requests information on "subject taught (in eight categories: special education, general elementary, math, science, English/language arts, social studies, vocational/technical, and other)." Please consider including English as a Second Language (ESL). The United States continues to diversify, and the number of ELL students is likely to grow as a result (Voight et al., 2015). Measuring such data increases the understanding of how to better retain teachers and more effectively teach students.
- Please consider adding definitions for time-based questions. For example, the Principal Questionnaire has individuals report on decisions for teacher professional development. The options include: Not at all, Somewhat, and a lot. These categories are vague and highly subjected which can affect data validity. Example definitions include: not at all (never), somewhat (1-49%), and a lot (more than 50%). In another example, participants are asked to report how frequently they engaged in specific activities over a 12-month period. The options include: never or rarely, sometimes, often, and very often. Example definitions include: never or rarely (0-1 month), sometimes (2-4 months), often (5-7 months), and very often (8+ months).

References:

1. Attendance Works. (2016). What's the difference between chronic absence and truancy? In.
2. Attendance Works, & Everyone Graduates Center. (2017). Portraits of change: Aligning school and community resources to reduce chronic absence.  
<https://www.attendanceworks.org/wpcontent/uploads/2017/09/Attendance-Works-Portraits-of-Change-Main-Document-Final-Sept.-1.pdf>
3. Bai, X., Ola, A., & Akkaladevi, S. (2018). Examination of the Relationship Between Class Attendance and Student Performance. *Issues in Information Systems*, 19(3).
4. Balfanz, R., Chang, H., & Byrnes, V. (2016). Preventing missed opportunity: Taking collective action to confront chronic absence.  
[https://attendanceworks.org/wpcontent/uploads/2017/09/PreventingMissedOpportunityFull\\_FINAL9.8.16\\_2.pdf](https://attendanceworks.org/wpcontent/uploads/2017/09/PreventingMissedOpportunityFull_FINAL9.8.16_2.pdf)
5. Buckingham, J., Wheldall, K., & Beaman-Wheldall, R. (2013). Why poor children are more likely to become poor readers: The school years. *Australian Journal of Education*, 57(3), 190-213.
6. Chang, H., & Works, A. (2013). *Reducing chronic absence: What will it take*. San Francisco: The.
7. Voight, A., Hanson, T., O'Malley, M., & Adekanye, L. (2015). The racial school climate gap: Within-school disparities in students' experiences of safety, support, and connectedness. *American journal of community psychology*, 56(3-4), 252-267.

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Dear Ms. Gilmore,

Data from other sources such as the Civil Rights Data Collection (CRDC), *EDFacts*, and the Common Core of Data (CCD) have replaced survey questions on the NTPS, where possible, to reduce burden on responding schools. Those collections provide information about schools and districts, not individual teachers; there is no comparable census of teachers than can replace survey items, particularly for questions about their individual experiences and perceptions. While states or districts may conduct their own surveys, those collections differ by jurisdiction. The NTPS uses standardized questions so that the same instrument is administered to teachers throughout the country.

Letters and other communication materials have been tested with school staff, and we believe these materials are appropriate for this study.

Please note that the NTPS brochure may be given to school districts, principals, or other school staff, and it is not solely available to sampled teachers, so we do not explicitly state that teachers may be eligible to receive a cash incentive.

Regarding principal and teacher demographics and the potential collection of data on sexual orientation and gender identity on the NTPS, we will share the results of cognitive and field tests at the 2022 Federal Committee on Statistical Methodology (FCSM) Research and Policy Conference on October 25, 2022. Those findings will inform our final questionnaires for public and private school principals and teachers for the 2023-24 NTPS.

While we do not plan to revise the collection of data on principal or teacher race or ethnicity for the 2023-24 NTPS, we are following the ongoing work surrounding the revision of OMB's Statistical Policy Directive No. 15.

Please note that the TLF is used to create the teacher sampling frame, and teachers sampled for the NTPS Teacher Questionnaire are asked more detailed questions about their main teaching assignment and other subjects they teach.

No changes are planned to questions on average daily attendance, since this is a valuable summary metric. For questions for which we are not trying to measure the exact number of occurrences of an event, may be difficult to convert into discrete incidents, or we are interested in perceived frequency, we deliberately use descriptors such as "sometimes" without further defining this for respondents. During cognitive testing, we probe respondents on any difficulty they may have answering these items or understanding terminology.

Thank you for your comment and your ongoing interest in NTPS and the work at NCES.

Sincerely,  
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