

Private School Universe Survey (PSS) 2025-26 and 2027-28 Data Collections, and 2027-28 PSS Frame Development Activities

Supporting Statement Part A

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Submitted by

National Center for Education Statistics
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SUPPORTING STATEMENT
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A. JUSTIFICATION

This request is to conduct the 2025-26 and 2027-28 Private School Universe Survey (PSS) data collections, and the 2027-28 PSS frame-development activities.

A1. Importance of Information

The National Center for Education Statistics (NCES), within the U.S. Department of Education, conducts the 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 the 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, 2019-20, and 2021-22 and those data have been published (<http://nces.ed.gov/surveys/pss/>). Data from the 2023-24 PSS are currently being processed and are scheduled to be released in June 2025. 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 number 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, 2020-21, and 2023-24 NTPS included 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 regularly update the private school sampling frame to account for openings and closings of private schools.

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 2025-26 and 2027-28 paper questionnaires will be imaged and stored electronically. Also as in all previous PSS collections, CATI follow-up will be used in 2025-26 and 2027-28 for mail/internet nonrespondents (an estimated 20 percent of all responses will be collected by CATI). Like all previous PSS administrations starting in 2009-10, the 2025-26 and 2027-28 PSS 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 the 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 (21 items) and because the data that are 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 less coverage for its surveys of private schools.

A7. Special Circumstances of Data Collection

In March 2024, the Office of Management and Budget (OMB) announced revisions to Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15) and published the revised SPD 15 standard in the Federal Register (89 FR 22182). The 2025-26 PSS and 2027-28 PSS data collections described in this package continue to use race and ethnicity categories as described in the 1997 SPD 15 standards. Race and ethnicity data are collected in the PSS by proxy, which requires special methodological considerations and testing before changes can be made to comply with the 2024 SPD 15 standards. Converting the race and ethnicity question on the web and the paper survey instruments to comply with the 2024 SPD 15 standards will require outreach to private schools to obtain support for the change because compliance to reporting race and ethnicity data is voluntary for private schools and not all private schools track the race and ethnicity composition of their schools. Non-compliance by private schools to such changes could also negatively impact response rates, trending, and overall data quality. The 2024 SPD 15 standards and required changes to the survey will be communicated to private schools at the next annual private school meeting, in spring 2025. Additional steps will be taken to design and implement a bridge study to examine how changes to the race and ethnicity question impact response rates and trending.

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 several 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

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

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

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 April 2024. The following private school groups were represented at the meeting:

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
 National Christian School Association
 Oral Roberts University
 The Association Classical Christian Schools
 Wisconsin Evangelical Lutheran Synod
 National Catholic Educational Association
 Lutheran Church, Missouri Synod

George Tryfiates
 Steve Lindquist
 Michael Schuttloffel
 Amada Torres
 Sarah Huber
 Philip Patterson
 Donnie Peal
 Tom Spencer
 Jim Rademan
 Lincoln Snyder
 Alan Freeman

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 2025-26 and 2027-28 PSS to ensure that all contractors and agents working on the 2025-26 and 2027-28 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 personally 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 2025-26 and 2027-28 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 PSS and having access to the data, including PSS 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 respondents to this survey through all follow-up efforts, potential survey respondents will be informed that (a) the U.S. Census Bureau administers the PSS on behalf of NCES; (b) NCES is authorized to conduct the 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. However, respondents will be assured of confidentiality of their directly identifying information (e.g., first and last name).

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, is authorized to conduct this survey 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.

If you choose to provide directly identifying personal information such as your name, it will be kept confidential and not reported with information about your school.

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 #4010, 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

2025-26 and 2027-28 PSS data collections

For each, 2025-26 and 2027-28 PSS data collection, a maximum of approximately 11,900 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 2021-22 PSS experience, the average completion time is estimated to be 20 minutes per respondent.

2027-28 PSS Frame Development

During the development of the list-frame portion of the 2027-28 PSS universe (see Supporting Statement Part B Section B.2), lists of private schools will be requested and received from approximately 150 state agencies and private school associations. It is estimated that each list response will take about one hour. A maximum of approximately 40,000 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 \$51.84⁰, and based on 5,981 average annual burden hours for PSS activities, the total estimated annual burden time cost to respondents is \$310,055.

2025-26 and 2027-28 PSS Data Collection and 2027-28 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	115	100%	115	115	60	115
Association School List Request Letter	34	100%	34	34	60	34
School Eligibility Telephone Script (list-frame)	40,000	100%	40,000	40,000	3	2,000
School Eligibility Telephone Script (area-frame)	11,900	100%	11,900	11,900	3	595
2027-28 Frame Development Total	-	-	52,049	52,049	-	2,744
<i>Biennial Data Collection Activities</i>						
School Questionnaire 2025-26	30,000	76%	30,000	22,800	20	7,600
School Questionnaire 2027-28	30,000	76%	30,000	22,800	20	7,600
2025-26 & 2027-28 Data Collection Total	-	-	60,000	45,600	-	15,200
Total Burden	-	-	112,049	97,649	-	17,944
Average Annual Burden	-	-	37,350	32,550	-	5,981

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 the total Federal cost for the activities described in this package as \$10,595,297. This estimate includes list building, data collection and processing costs as well as NCES staff and support contractors. Accordingly, the estimated annual cost to the Federal Government for the three years of activities described in this package is \$3,531,766.

⁰ Source: BLS Occupation Employment Statistics, <http://data.bls.gov/oes/> datatype: Occupation codes Education Administrators (11-9030); accessed on July 17, 2024.

A15. Changes in Burden

The apparent increase in burden in this package (as compared to OMB# 1850-0641 v.15) derives from an increase in the number of respondents.

A16. Publication Plans/Time Schedule

2025-26 PSS

The proposed plan, which may change based on operational necessity or survey conditions, begins with an initial email, and mailed invitation, to non-Amish and non-Mennonite schools to complete the web survey on September 9, 2025 (see Appendix C-2). An invitation and paper survey will be mailed to Amish and Mennonite schools on September 30, 2025. These mailings are followed by four email reminders that will be sent to nonrespondents including mid-survey mailouts, pre-CATI follow-ups, pre-field follow-ups, and a final reminder. Personal follow-up visits and CATI for mail and web survey non-interviews are scheduled for January 2026 through May 2026.

The 2025-26 PSS survey is being conducted according to the following time schedule:

Request Private School Lists	7/9/2024
Conduct Screener Calls for List-Frame Schools	8/21/2024-3/10/2025
Conduct Screener Calls for Area-Frame Schools	8/11/2025-10/10/2025
Production Deployment or Internet Instrument	9/9/2025-6/5/2026
1 st Survey Mailout/Email (web invitation) to non-Amish and Mennonite Schools)	9/9/2025
2 nd Survey Mailout (web invitation and/or paper questionnaire)	9/30/2025
Reminder/Thank You Postcard Mailout	10/21/2025
Mid-Mailout Email Reminder	10/21/2025
3 rd Survey Mailout (web invitation and/or paper questionnaire)	11/4/2025
Pre-CATI Email Reminder	12/12/2025
CATI/Field Follow-up	1/12/2026-5/22/2026
Pre-Field Follow-up Email Reminder	3/24/2026
Final Email Reminder	4/28/2026
Check-in, Clerical Edit	9/9/2025-6/2026
Process Data	2/2026-10/2026
Final File	11/2026
NCES Reports Results	5/2027

2027-28 PSS

The 2027-28 PSS frame activities will be conducted according to the following time schedule:

Request Private School Lists	7/7/2026
Conduct Screener Calls for List-Frame Schools	8/17/2026-3/5/2027

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—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 *Data Tables, 2021-22*, which can be accessed from the PSS web page at <http://nces.ed.gov/surveys/pss>. NCES will publish the 2023-24 survey results in June 2025.

A17. Request Not to Display Expiration Date

Not applicable.

A18. Exceptions to the Certifications

Not applicable.