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# PAPERWORK REDUCTION ACT SUBMISSION

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## **Mandatory Civil Rights Data Collection October 2024**

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### SUPPORTING STATEMENT, PART B: COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

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**1. Describe the potential respondent universe (including a numerical estimate) and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, state and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.**

The 2025–26 and 2027–28 Civil Rights Data Collections (CRDC) will be a universe of public schools and local educational agencies (LEA). Therefore, none of the sampling procedures (i.e., stratification, estimation, etc.) are proposed to be used in the 2025–26 and 2027–28 CRDC administrations.

Respondent Universe

The respondent universe for the 2025–26 and 2027–28 CRDCs will be the most recently available data from the Common Core of Data (CCD) *National Public Education Survey of Local Educational Agencies*. The CCD is designed to be the U.S. Department of Education’s (ED) comprehensive statistical database of all public schools and LEAs. Most of the data are obtained from administrative reports maintained by state educational agencies (SEA). The CCD survey data are collected annually by the National Center for Education Statistics (NCES). The frame for the CCD survey includes LEAs and regular, non-regular (special education, alternative, career, or technical), and public charter schools.

For the CRDC and the CCD, an eligible school is defined as an organization authorized by public authority and financed primarily through public funds to provide public education to students. Under this definition, schools:

- Are operated by a public school district, independent charter district, or state agency on behalf of the state
- Provide instruction for students
- Have, will have, or had one or more students
- Have, will have, or had one or more teachers
- Have an assigned administrator(s) (principal) responsible to public authority, and
- Receive public funds as its primary support.

Frame Additions and Deletions

While the CRDC definition of a school matches that used by the CCD, there are a few operational differences. In some instances, schools in the CCD are essentially administrative units that may oversee entities that provide classroom instruction, or the school in the CCD may provide funding or oversight only. The CRDC is primarily designed to collect data from public

LEAs about educational entities where students receive educational services (physically and/or remotely) for at least 50 percent of the school day, regardless of whether students are reported elsewhere for funding, accountability, or other reporting purposes. To be eligible to participate in the CRDC, schools must serve students at the (physical and/or remote) site for at least 50 percent of the school day. Since the CCD and CRDC differ slightly in scope, some records are deleted, added, or modified to provide better coverage and a more efficient frame for the CRDC. The following types of school records are deleted from the CCD during the creation of the sampling frame:

- District boundary type 2: Agency has closed with no effect on another agency's boundaries.
- School status 2: School has closed since the time of the last report.
- Nonoperational school districts: School districts that do not operate a school.
- Schools and school districts with a Federal Information Processing Standards (FIPS) state code of 58 (overseas DoD), 60 (American Samoa), 66 (Guam), 69 (Northern Mariana), 78 (U.S. Virgin Islands), or 59 (Bureau of Indian Education).

Districts with no membership or missing membership at the district-level are generally excluded, except in some special cases, such as where membership data were available for the associated schools.

Additionally, OCR augments the CRDC frame to include justice facilities, which may not be under the purview of the SEA or an LEA. In collaboration with the Department of Justice's Office of Justice Programs, OCR adds justice facilities which may not have been otherwise included in the CCD to ensure coverage of all youth in pre- or post-adjudication facilities that receive educational services. Also, state-operated programs for special populations of students (such as schools for the deaf and schools for the blind) are added to the universe if they are not already included in the CCD list.

### Response Rate

The CRDC has a traditionally high response rate due to the mandatory nature of the data collection. The last six CRDCs, which have been universe collections, have had response rates that have ranged from 98 to 100 percent. For the 2011–12 CRDC, 98 percent of all participating LEAs and 99 percent of all schools provided data. For the 2013–14 CRDC, 2015–16 CRDC, and 2017–18 CRDC, 99 percent of all participating LEAs and 99 percent of all schools provided data. The response rate for the 2020–21 CRDC was 100 percent for both LEAs and schools, and the response rate for the 2021–22 CRDC was 99 percent for both LEAs and schools. The response rate for the 2023–24 CRDC and proposed 2025–26 and 2027–28 CRDCs are expected to be no less than 98 percent of all participating LEAs.

## **2. Describe the procedures for the collection of information, including:**

- **Statistical methodology for stratification and sample selection**
- **Estimation procedure**
- **Degree of accuracy needed for the purpose described in the justification**
- **Unusual problems requiring specialized sampling procedures, and**
- **Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

The 2025–26 and 2027–28 CRDCs will include a universe of all public schools and LEAs. Therefore, none of the sampling procedures (i.e., stratification, estimation, etc.) is proposed to be used in the 2025–26 and 2027–28 CRDC administrations.

### Procedures for the Collection of Information

*Verification and updates of school lists by LEAs: Spring 2025 - Fall 2026 (2025–26 CRDC) and Spring 2027 - Fall 2028 (2027–28 CRDC)*

LEAs are notified by email of their required participation in the collection and asked to verify and update their listing of schools and provide a primary point of contact and an alternate point of contact for the survey. Links to survey questionnaires and supporting documents are also included in the initial email to LEAs. A Web-based system is available to LEAs to provide contact information for a principal point of contact. LEAs may also verify their school list, add new schools that opened at the beginning of the 2025–26 and 2027–28 school years, collapse schools that have merged, or remove schools that have closed. In past surveys, OCR has encountered discrepancies between the definitions of a school as held by the LEA itself and as reported by state departments of education to the CCD. This issue occurs most often in rural areas or in schools that offer grades K-12 in one building with one head principal. The schools often consider themselves one cohesive unit while the state does not. For accounting or other administrative purposes, the state may artificially split these schools by grade level and report them as two or three separate schools. For the CRDC, the K-12 school with one principal can be collapsed into one reporting entity and report all students enrolled in grades K-12.

Telephone follow-up and reminder emails are sent to LEAs that do not provide a principal point of contact or verify their school list.

*Data collection by selected data submitters: Spring 2025 - Fall 2026 (2025–26 CRDC) and Spring 2027 - Fall 2028 (2027–28 CRDC)*

While awaiting for LEAs to identify a principal point of contact and a verified list of participating schools, OCR provides updated training videos, frequently asked questions, technical assistance materials, and other resources, available on the CRDC Resource Center website (<https://crdc.communities.ed.gov>). A support center is also available for LEAs to call or email questions regarding the content of the data to be collected. While LEAs are collecting and

after they have collected their data for the CRDC, OCR provides guidance for LEAs to prepare flat files of the required data to prepare for the survey data submission opening.

*Survey Data Submission Window: Fall 2026 - Winter 2027 (2025–26 CRDC) and Fall 2028 - Winter 2029 (2027–28 CRDC)*

The survey data submission window opens with email notification to all participating LEAs. LEAs will be given a minimum of 60 days to submit their data to OCR. In anticipation of the survey data submission system opening, OCR continues to update technical assistance documents and post them on the CRDC Resource Center website. OCR also increases the support center's hours of operation. During the survey data submission period, frequent communication occurs with participating LEAs to offer technical assistance and, as the survey data submission due date approaches, reminders are sent to LEAs that have not yet certified their CRDC data submission.

### Accuracy

The CRDC is intended to collect information about educational equity and excellence in public elementary and secondary education. Although respondents are experts in the educational opportunities and participation in their LEAs, there are opportunities for potential error, either through technical mishap or misinterpretation of the intent of a survey item. Over the course of several CRDC administrations, OCR has developed and continues to develop a series of data quality checks designed to flag these errors for review by the respondent and OCR. These edits rely on internal logic checks, consistency within specific tolerances, and comparisons to similar data collected by other program offices within ED.

Because the CRDC is a mandatory collection, respondents are required to provide data for each applicable item. (See Attachment A-4 for more details about how directional indicators are used to determine item applicability.) In rare cases, an LEA may not be able to respond with complete and accurate data to a specified item. In these cases, the LEA is required to submit an action plan for the CRDC to OCR. In an action plan, the LEA is required to describe the specific steps and timeline that it will follow to ensure that the data are collected for future CRDCs. Once OCR approves the plan, the LEA is allowed to certify its data submission. Later, when OCR is preparing the CRDC data files, for an item with missing data that came from an LEA with an action plan, OCR assigns an action plan reserve code to the missing data.

**3. Describe methods to maximize response and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.**

## Response Rate

Historically, the civil rights survey has had a very high response rate. In 2000, the predecessor Elementary and Secondary School Civil Rights Compliance Report (E&S Survey) was sent to a universe of all LEAs and schools in the United States. The overall response rates were 97 percent for all LEAs and 99 percent for all schools. The overall response rates for the 2002 E&S Survey were 98 percent for LEAs and 98 percent for schools. For the 2004 CRDC, the response rates, including partial respondents to the data collection, were approximately 97 percent for all LEAs, and 97 percent for all schools. The 2006 CRDC achieved an unprecedented 100 percent response rate for LEAs and a 99.6 percent response rate for schools. The 2009–10 CRDC achieved a response rate of 100 percent for LEAs, and 100 percent for schools. The 2011–12 CRDC achieved a response rate of 98 percent for LEAs and 99 percent for schools. The overall response rates for the 2013–14 CRDC, 2015–16 CRDC, and 2017–18 CRDC, were 99 percent for LEAs and 99 percent for schools. The response rate for the 2020–21 CRDC was 100 percent for both LEAs and schools, and the response rate for the 2021–22 CRDC was 99 percent for both LEAs and schools.

## Methods to Maximize Response Rates

Frequent communications occur with participating LEAs over the course of the data collection to ensure compliance with this statutorily mandated collection. LEAs are notified via email of their obligation to report. In addition, frequent email correspondence occurs with the LEA's principal point of contact regarding technical assistance available to support the LEAs submitting the required data, reminders of upcoming deadlines, and notifications if the CRDC data were not submitted by the due date. If LEAs fail to respond in a timely manner, then the contractor for the data collection, with assistance from OCR and its field offices as necessary, provides extensive outreach and assistance to the greatest extent possible until the LEAs respond, or the final deadline for accepting data has passed. The superintendents of non-responding LEAs are also contacted by phone and email. This has proven to be very successful in past years.

OCR has also met with SEAs wanting to support LEAs responding to the CRDC. During the NCES STATS-DC Conference, OCR holds a special session for SEAs to learn more about the upcoming changes to the CRDC, important dates for the completion of the CRDC, and how to access technical resource materials. It is not uncommon for states to upload some of the LEAs' data for the CRDC. The last outreach letter emailed by OCR during the CRDC submission period is to the SEAs, asking them to encourage LEAs that have not yet certified their data to complete the CRDC by the deadline.

**4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.**

OCR plans to evaluate the data collection procedures and data items described in this submission in a number of ways. Many of the data elements proposed for the 2025–26 and 2027–28 CRDCs were collected in the previous 2011–12, 2013–14, 2015–16, 2017–18, and 2021–22 CRDCs, and will be collected in the upcoming 2023–24 CRDC. Data quality is an overriding concern that OCR continues to assess and evaluate. OCR assesses data from CRDC survey years to evaluate the internal and external consistency and reliability of the reported data to continuously improve the business rules and edit checks used in the survey submission system. Edit checks help to identify potential problems and provide opportunities for LEAs to correct possible mistakes before certifying the accuracy of their submission.

### Content

The proposed data elements include items required for the 2025–26 and 2027–28 CRDCs and new required and optional items for the 2025–26 and 2027–28 CRDCs. Similar to what OCR did for the 2013–14 CRDC, dependent on staff availability and funding resources, OCR may conduct recordkeeping visits with LEAs for the 2025–26 and 2027–28 CRDCs, to determine whether and how they presently collect data for the CRDC data groups. If conducted, then OCR would select sites that reflect a diverse set of LEAs in terms of size, urban/city, level of sophistication of SEA and LEA data systems, and programs offered. These visits may gather information on ways in which the survey submission tool may assist in improving data quality through edit checks and other analytical procedures. Additionally, OCR is exploring the possibility of conducting one-on-one cognitive interviews with SEA, LEA, and/or school respondents to validate proposed item wording, dependent on available staff and funding resources. These interviews may be conducted by phone and in person, as appropriate.

### Survey Tool

OCR and NCES collaborated to develop an enhanced survey data submission tool that was first implemented for the 2013–14 CRDC. Testing plans for the 2025–26 CRDC and 2027–28 CRDC tool closely mirror previous CRDC protocols. For the 2025–26 and 2027–28 CRDCs, OCR plans to invite a few LEA and SEA representatives that intend to pre-populate data elements, to participate in some initial discussions with the contractor about various features of the tool. If funding is available, then OCR will pilot test the online survey tool for data submission with LEAs and SEAs. Pilot participants will likely have access to the survey software for a period of no less than 10 business days.

OCR will work with its selected contractor to compile LEA and SEA suggestions, categorized by level of criticality and feasibility. Based on these results, OCR will identify changes, such as text refinements, and any critical technical issues for correction and resolution prior to the opening of the 2025–26 CRDC and 2027–28 CRDC survey tool for all participating LEAs.

**5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other persons who will actually collect and/or analyze the information for the agency.**

OCR intends the 2025–26 and 2027–28 collections to be a universe of public schools and LEAs. If budget constraints are such that a universe collection for the 2025–26 and 2027–28 CRDCs is not possible, then OCR will work closely with NCES to prepare a sample selection plan and submit it to OMB for review and approval. After OMB approves the plan, OCR will have its contractor, Applied Enterprise Management Corporation, implement the plan for the 2025–26 and 2027–28 CRDCs.