

**OMB Information Collection Request
Supporting Statement A
U.S. Department of Commerce
U.S. Census Bureau
CPS School Enrollment Supplement
to the Current Population Survey
OMB Control Number 0607-- 0464**

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary.

The School Enrollment Supplement is jointly sponsored by the U.S. Census Bureau, the Bureau of Labor Statistics (BLS), and the National Center for Education Statistics (NCES). Collected in October each year as a supplement to the Current Population Survey (CPS), these data provide basic information on the school enrollment status of various segments of the population necessary as background for policy formulation and implementation. This supplement is the only annual source of data on public/private elementary and secondary school enrollment, as well as the characteristics of private school students and their families.

As part of the Federal Government's efforts to collect data and provide timely information to government entities for policymaking decisions, this supplement provides national trends in enrollment and progress in school. The basic school enrollment questions have been collected annually in the CPS for 65 years. Consequently, this supplement is the only source of historical data at the national level on the age distribution and family characteristics of college students, and on the demographic characteristics of preprimary school enrollment. Discontinuance of these data would disrupt a data series that has reliably and consistently informed Federal, state, and local governments, and program and policy makers on the state of education in our nation for over half of a century.

Title 13 United States Code, Sections 8(b), 141, and 182; and Title 29, United States Code, Section 2 authorize the collection of most of the information in this survey. The Education Sciences Reform Act of 2002 (ESRA, Title 20 United States Code, Section 9543) authorizes the National Center for Education Statistics to collect this information.

The CPS advance letter presently in use (Attachment B) is generic for all CPS collections, and cites the legal authorities stated above.

2. Purposes and Uses of the Information Collection

Once the basic CPS labor force questions are completed, a transition is made to the supplemental questions on School Enrollment. The same respondent from the basic CPS serves as the respondent for the supplement questions and responds for themselves and other household members three years old and over. Interviews are conducted using computer-assisted interviewing technology in person and by telephone. For in person interviews, the respondent may request the interview to be conducted by telephone once basic household information is collected. The School Enrollment information is collected only once, during the October CPS data collection. The information collected will be shared with the sponsoring agencies, the National Center for Education Statistics (NCES) and the Bureau of Labor Statistics (BLS). This is an ongoing collection, collected annually, and the requirements have been consistent for the past several years.

The purpose and use of specific data items collected in the CPS School Enrollment Supplement are noted below. The proposed questions are in Attachment A.

a. Items for Adults on Basic School Enrollment (See Items SSCHOL, PUBLIC, and GRADE in Attachment A)

Institutions responsible for the education of preprimary, elementary, secondary, college, and vocational students use the school enrollment data collected in the CPS School Enrollment Supplement. These institutions include federal agencies; state, county, and city governments; and private organizations. Employers and analysts who need current information on the educational characteristics of the population to anticipate the composition of the labor force in the future also use these data. As part of its mission as the primary collector and distributor of data on the American work force, the BLS publishes a wide array of data about school-age youth. Since 1959, the BLS has relied on this supplement to supply labor force data on youths by their school enrollment status. This single statistical series includes historical trends on the hours worked, occupations held, and unemployment rates of youths by whether they are full- or part-time students, recent high school graduates or dropouts, or attending any type of vocational school.

Although we obtain current enrollment status for 16 to 54 year-olds monthly in the CPS basic program, the BLS and the Census Bureau are still dependent on the supplement questions to obtain recency of high school graduation or dropping out to analyze the impact of these events on the labor force participation of young adults.

b. Items for Children on Basic School Enrollment (See Items SCH35, SCH614, CHPUB, and CHGRDE in Attachment A).

The School Enrollment Supplement has included the items that concern nursery and kindergarten enrollment of 3- and 4-year-old children since 1967. These questions are

designed to measure differences between social and economic groups in the extent to which young children are exposed to nursery school and kindergarten experiences before entrance into regular school. The BLS uses these data in comparing labor force status of mothers with young children enrolled and not enrolled. Enrollment rates in public and private schools by demographic characteristics, such as income, provide policy-relevant information on access to public and private schools.

c. Items on Higher Education (See Items FULL, STYPE, VOCA, and LASTYR in Attachment A).

In addition to providing data on school-age children and young adults, this supplement provides a total aggregation of all people enrolled in or recently graduated from high school and enrolled in college or vocational school. The school enrollment data also show the total number of adults returning to school to complete high school or to obtain post-secondary education. The school enrollment data for adults of all ages are essential in understanding both changes in the "quality" of the labor force and the "health" of higher education.

d. Items on School Completion and Dropouts (See Items LASTGD, YRATT, YRDEG, YRDIP, GED(1- 3), S56, and S57 in Attachment A).

Labor force participation data for all students, by current enrollment status, and for dropouts and graduates provide necessary measures of economic well-being. This supplement provides the only annual data on enrollment status or date of school completion and labor force status by personal and family characteristics. It also provides general-purpose enrollment data for the entire population and is used extensively by the Office of Planning and Budget of the Department of Education.

The estimate of high school dropout rates and characteristics obtained from this survey will enable the NCES to comply with its legislative mandate to collect and report information on the condition of education in the United States.

Information quality is an integral part of the pre-dissemination review of the information disseminated by the Census Bureau (fully described in the Census Bureau's Information Quality Guidelines). Information quality is also integral to the information collections conducted by the Census Bureau and is incorporated into the clearance process required by the Paperwork Reduction Act.

3. Use of Internet Technology and Burden Reduction

We deem the use of personal visits and telephone interviews, using computer-assisted telephone interviewing and computer-assisted personal interviewing, the most appropriate collection methodology given existing available information technology. We are examining the

Internet as a reporting option and are currently conducting user acceptance testing of a self-response data collection instrument for the basic CPS core questions. Future plans include field testing, with hopes to implement this mode of collection in 2027.

4. Efforts to Identify Duplication and Use of Similar Information

The basic school enrollment questions have been collected annually in the CPS for 65 years. The Census Bureau has consulted with other government agencies, such as the Department of Education, NCES, and BLS, and has determined that the CPS School Enrollment Supplement is the only source of historical data at the national level on school enrollment by demographic characteristics. Government agencies and private firms have relied upon this series for decades as the main source of national school enrollment data.

A number of questions in this supplement may appear in the American Community Survey (ACS) and in other demographic surveys. However, this supplement's comprehensive set of questions does not duplicate any other single information collection and ensures the historical continuity of a data series.

The CPS School Enrollment Supplement is a yearly source of annual data on enrollment in all schools by demographic, social, and economic characteristics. No comparable data can be replicated, substituted, or modified to address the needs described in Item 2 above. Surveys such as the Survey of Income and Program Participation (SIPP), ask some education questions on a regular basis, but they do not collect the same set of information across all age groups that the CPS does.

This supplement to the CPS is the historical source of annual enrollment data for children 3 through 14 years old, which includes children in preprimary and elementary school. Progress in school (modal grade) by student and family characteristics, such as ethnicity, was used in evaluation of trends toward equality in schooling. The CPS has provided important data on federal support for private education in terms of the population affected and cost to the government.

Other surveys obtain, or will obtain, data on subpopulations of the CPS sample. Except for the ACS, these surveys often use smaller samples.

a. The Education Enrollment section of the SIPP collects information on the months of enrollment, grade level, school type, full-time or part-time status, and the credential(s) the survey participant is working toward. Enrollment information is collected for all survey participants age 3 or older. This information provides details on the school enrollment for the population at the month-level and can be used to analyze the manner with which education may interact with job, program, and family factors.

b. The Integrated Postsecondary Education Data System Survey of the Department of Education provides administrative data on numbers of students for the universe of postsecondary schools (biennially by race, ethnicity, and age). This data source does not provide any social or economic data on students or any data for comparison with nonstudents.

Each of the above surveys can include a portion of the CPS data for different populations at different times. Analysts cannot aggregate the data from these surveys to get a complete enrollment picture at a common point in time. Definitions are not consistent, and the amount of detail varies. The CPS provides comparable measures of enrollment in all levels of school so that analysts can trace year-to-year progression in school.

We can collect preprimary enrollment data only in a large household survey, since the eligible population is small and a large sample is necessary to obtain reasonable data. Also, most preprimary schools are not part of regular public school systems and do not provide administrative data. Preprimary education is a changing area of education. The proportion of children involved in preprimary education has risen over the decades, particularly enrollment in full-day preprimary schools providing day care for children of working mothers.

Analysts can calculate high school dropout rates by grade, sex, and race and ethnicity from the CPS, as well as enrollment and employment status of recent high school graduates. Although the SIPP can provide similar data, the sample is significantly smaller. Comparisons of race and ethnicity groups or grades, which are of concern on the federal and local levels, may be impossible. The Department of Education uses the CPS data as a critical component of their congressionally mandated annual study "Trends in High School Dropout and Completion Rates in the United States."

Analysts widely use enrollment data for adults from the CPS for small population groups. Recently, college enrollment of young high school graduates by race has been widely discussed. Because of the sample size difference, differences between the estimates by sex are more difficult to detect with the SIPP. For example, the SIPP would not have detected changes in enrollment rates of young Black or African American adults, as the difference would not have been statistically significant. The confidence intervals on education data in the SIPP are about two-thirds larger than similar estimates in the CPS.

Type of school for college students is not available in the SIPP. Although the SIPP will be useful in tracking educational transitions, the sample size of the CPS is crucial in making annual cross-sectional data useful.

Although the SIPP and the CPS have a few enrollment items in common, the surveys do not duplicate each other. The SIPP school enrollment items relate to receipt of certain types of income and participation in government programs by adults. Enrollment data are not the focus of the survey but provide supporting data as do the demographic characteristics of respondents. They elaborate on the economic status of the population as related to the focus of the survey.

The SIPP does not provide the depth of data necessary for analysis of enrollment in postsecondary school. It provides limited information on secondary school and nothing on elementary school.

5. Impacts on Small Businesses or Other Small Entities

We designed the supplemental questions to obtain the required information with minimal respondent burden. The proposed items and interviewer procedures have been developed over the years as a result of consultation between the Census Bureau, the BLS, and other government agencies. Further, there are no legal requirements that may impose respondent burden.

6. Consequences of Collecting the Information Less Frequently

We must collect the school enrollment data annually in order to track trends in enrollment at all levels. Shifts in trends affect educational institutions and the bodies governing them in several areas such as government expenditures, employment patterns of youth, and labor force demands within the teaching profession. Planning for areas such as these requires accurate and current data. These data are part of the Department of Education's Annual Report to Congress on the Condition of Education.

7. Special circumstances that would cause the information collection to be conducted in a manner inconsistent with OMB guidelines

This data collection will be consistent with the general information collection guidelines of 5 CFR 1320.5. No special circumstances apply.

8. Comments in Response to the Federal Register Notice/Outside Consultation

Over the past year, we have consulted the following people concerning the development of the supplement:

Chris Green
National Center for Education Statistics
Chris.Green@ed.gov

Nicholas Johnson
U.S. Bureau of Labor Statistics
202-691-6471

In addition, a statement soliciting comments for improving the CPS data is prominently placed in all the Census Bureau publications that cite the CPS data. We include a similar statement in the technical documentation that accompanies the microdata files.

We published a notice of our intent to ask the school enrollment questions in the December 26, 2024, edition of the Federal Register (89 FR 104976). We received no public comments in reaction to the notice. The CPS advance letter (see Attachment B) provides respondents with an address at the Census Bureau to which they can submit general comments on the survey and specifically those comments regarding respondent burden.

9. Explanation of Any Payment or Gift to Respondents

The Census Bureau does not make any payments or provide any gifts to individuals participating in the CPS and its monthly supplements.

10. Assurance of Confidentiality Given to Respondents

All information given by respondents to Census Bureau employees is held in strict confidence under Title 13, United States Code, Section 9. Each Census Bureau employee has taken an oath to protect the confidentiality of respondents' data and is subject to a jail penalty and/or substantial fine if he or she discloses any information given to him or her.

The Census Bureau will comply with the Privacy Act of 1974 and the Paperwork Reduction Act requirements in terms of notice to the respondent. Each sample household receives an advance letter approximately one week before the start of the CPS initial interview (see Attachment B). The letter includes the information required by the Privacy Act of 1974, explains the voluntary nature of the survey, and states the estimated time required for participating in the survey. Interviewers must ask if the respondent received the letter and, if not, provide a copy and allow the respondent sufficient time to read the contents. Also, interviewers provide households with the pamphlet, *The U.S. Census Bureau Respects Your Privacy and Protects Your Personal Information*, which further states the confidentiality assurances under Title 13 associated with this data collection effort and the Census Bureau's past performance in assuring confidentiality (see Attachment C).

Personal information collected includes name, address, telephone number age or date of birth, email address, race, and ethnicity.

Disclosure of the information provided to us is permitted under the Privacy Act of 1974 (5 U.S.C. § 552a) and may be shared with other Census Bureau staff for the work-related purposes. Disclosure of this information is also subject to all the published routine uses as identified in the Privacy Act System of Records Notice COMMERCE/Census-

COMMERCE/Census-3, Demographic Survey Collection (Census Bureau Sampling Frame) and authorized employees from the Bureau of Labor Statistics and the National Center for Education Statistics.

Census Bureau staff have received training on privacy and confidentiality policies and practices. Access to this information is restricted to authorized personnel only. Access to this information is being monitored, tracked, or recorded on FedRAMP-approved computer systems that are in compliance with the Federal Information Security Management Act (FISMA) and OMB Circular A-130.

11. Justification for Sensitive Questions

The CPS School Enrollment Supplement does not contain any questions of a sensitive nature.

12. Estimates of Annualized Hours and Cost Burden

There will be approximately 54,000 households selected for interview, with one respondent per household. Each interview takes approximately three minutes; therefore, the total estimated respondent burden for the CPS School Enrollment Supplement is 2,700 hours for fiscal year 2025 (see chart 12A). We base these estimates on previously conducted School Enrollment Supplements. The actual interview time is dependent upon the size of the household and the educational characteristics of the household members.

The estimated total annual respondent cost burden based on these hours is \$1,443,960. For individuals, the wage rate is \$26.74 per hour based on hourly earnings for employees as reported by the Bureau of Labor Statistics (chart 12B).

12A. Estimated Annualized Burden Hours

Type of Respondent	Expected Number of Respondents	Number of Responses per Respondent	Average Burden per Response (in hours)	Total Burden Hours
CPS Household Respondent	54,000	1	0.05	2,700

12B. Estimated Annualized Burden Costs

Type of	Total Burden	Hourly	Total Respondent
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Respondent	Hours	Wage Rate	Costs (rounded to nearest dollar)
Household Respondent	2,700	\$26.74	\$72,198
Total	2,700		\$72,198

13. Estimates of Other Total Annual Cost Burden to Respondents

There are no direct costs to the respondents other than that of their time to respond.

14. Annualized Cost to the Federal Government

The estimated cost of the School Enrollment Supplement is \$200,000, and is borne by the Census Bureau, BLS and NCES for the fiscal year.

15. Explanation for Program Changes or Adjustments.

There are no program changes or adjustments.

16. Plans for Tabulation, Publication, and Project Time Schedule

We will conduct the CPS, of which this supplement is a part, during the week of October 19 - 25, 2025. We expect to produce the basic school enrollment tabulations by March 2026. We plan to publish a final report by October 2027.

17. Reason(s) Display of OMB Expiration Date is Inappropriate.

The agency is seeking approval to not display the OMB expiration date on the questionnaire associated with this information collection. The School Enrollment Supplement is administered as part of the CPS monthly interview in October of each year. However, the supplement (as well as all the CPS supplements) bears an OMB control number and expiration date different from the basic CPS interview. The OMB control number for the CPS basic interview is included in the advance letter we give respondents (see Attachment B). Because of these complexities and the anticipated respondent confusion involved with expressing a separate control number and expiration date to respondents for the supplement questions, we request a waiver of the requirement to display the OMB control number and expiration date for the CPS School Enrollment Supplement.

18. Exceptions to the Certification for Paperwork Reduction Act Submissions

The agency certifies compliance with [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#).