#### Paperwork Reduction Act Submission Supporting Statement

**Mandatory Civil Rights Data Collection**

**June 2013**

Attachment A-5

**Directed Questions**

 **Introduction**

Attachment A-5 contains directed questions where the Office for Civil Rights (OCR) is soliciting comments regarding questions about specific data groups proposed for collection in the 2013–14 and 2015–16 CRDC.

**Directed Questions**

For the 2013–14 and 2015–16 CRDC, OCR is proposing to collect new information regarding justice facilities and the educational services provided to youth at these facilities. This short set of questions is designed to provide OCR with critical information about the duration of educational services and the number of youth served at justice facilities. While long-term secure facilities and boot camps have been included in the CRDC since 2009, OCR is proposing to expand the coverage of justice facilities to include detention centers and other types of justice facilities providing educational services either pre- or post-adjudication.

* Are juvenile justice agencies able to provide the requested data for the 2013–14 and 2015–16 school year (DG 940: Justice facility days in regular school year, DG941: Justice facility educational program participants, DG942: Justice facility hours per week, DG943: Justice facility type)? If not, are there specific modifications to the data groups that would enable data to be submitted to OCR under reduced reporting burden?

For the 2013–14 and 2015–-16 CRDC, OCR is proposing to continue to collect information on non-personnel expenditures. Analysis of data submitted from prior years of the CRDC administration have revealed potential data quality issues with school districts reporting school-level non-personnel expenditures. Additionally, some districts have indicated that the collection of these items is burdensome.

* Are there other data elements that OCR could collect to support the analysis of non-personnel resource equity among schools within a district that would reduce the reporting burden on school districts and improve the quality of data to be analyzed?