



January 15, 2025

Juliana Pearson, PRA Coordinator, Strategic Collections and Clearance, Governance and Strategy Division,
Office of Chief Data Officer, Office of Planning, Evaluation and Policy Development.

RE: *FR Doc. 2024–29634*

The National Catholic Educational Association welcomes the opportunity to comment on the Department’s proposed framework for the biennial collection of data for the Private School Survey (PSS) for years 2025-26 and 2027-28.

NCEA strongly supports the ongoing continuation and updating of the PSS survey as it is the only national source of significant data on the status of private schools that constitute 23 percent of the nation’s schools and 9 percent of the elementary and secondary school students. This is the only source of all data on all private schools that contributes to a comprehensive picture of the national landscape of primary and secondary education in the United States.

In this era that has seen increased political focus and activity around alternatives in education, the need for, and the accuracy of, private school data and its complementary and comparability with that of public education is necessary. The questions contained in this survey—demographic, race/ethnic and programmatic are necessary to complete the picture of private education and the populations they serve.

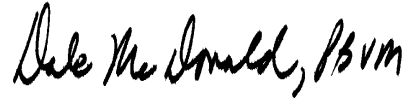
We call particular attention to Item 11 that asks whether in-person, virtual, and/or hybrid classes are offered. We strongly agree for the need for data from this variable that can be used to estimate the types of learning modalities available to students who attend private schools and inform the understanding of the distribution and characteristics of private schools.

The National Catholic Educational Association is the largest, private professional education association in the world. NCEA works with Catholic educators to support ongoing faith formation and the teaching mission of the Catholic Church. Our

membership includes nearly 140,000 educators serving 1.6 million students in Catholic education.

Thank you for considering these comments. Please contact NCEA to assist with any clarification as needed.

Respectfully submitted,

A handwritten signature in black ink that reads "Dale McDonald, PBVM". The signature is written in a cursive style with a large, stylized 'D' and 'M'.

Dale McDonald, PBVM, PhD
Vice President of Public Policy

