NCES Response to Public Comments Received Regarding the School Attendance Boundary Survey (SABS) 2013 and 2015 Data Collection

**PUBLIC COMMENT – from an unknown commenter and from Kimberly A. Goyette, Temple University**

The National Center for Education Statistics (NCES) would like to thank you for providing comments regarding the School Attendance Boundary Survey. We have grouped our responses to your questions into three categories: duplication of effort, collection, and dissemination. We address major concerns within each category.

For your information, the Elementary, Secondary, and Library Studies Division at NCES is responsible for overseeing the project and for the final product. The Census Bureau’s Governments Division will oversee boundary acquisition and coordinate transfer to NCES contractors who will digitally preserve and organize the acquired data, review the resulting data for quality assurance, maintain a boundary digitizer application to facilitate response, and prepare future data products as directed by the NCES program manager. This project does not have an independent advisory board at this time. We will continue to consider this as an option for subsequent years of the collection. The GIS files disseminated by the school attendance boundary survey will comply with required Federal Geographic Content Standards. NCES always welcomes public feedback.

**Duplication of Work**

NCES keeps current with existing commercial efforts involving school boundaries. Our experience has shown that these commercial endeavors have a motivation of profit and may not hold to the same rigorous methodology required by a Federal Statistical Agency. For example, comprehensive metadata about the collection origins, edits, and data stewardship are not provided. Additionally, versions and releases are not comprehensively maintained and therefore may inhibit longitudinal analysis of these data, and the licensing restrictions associated with commercial data products do not allow NCES to make the data freely and publicly accessible.

Our project has a close working relationship with SABINS and the Minnesota Population Center (MPC). Under this close collaboration, our groups have and continue to share data where opportunities to do so arise. The SABINS and NCES collections are complementary, but not duplicative. The SABINS Project primarily developed grade-specific boundaries for the 2009-2010 academic year, whereas the NCES boundary collection will provide school-level boundaries for 2013-2014 and 2015-2016.

**Collection**

Census Bureau staff will contact Local Education Agencies (LEAs) and State Education Agencies (SEAs) to acquire the necessary information. LEAs will be contacted individually during the collection year, and Census Bureau staff will pursue opportunities to obtain local, regional, or state-wide collections of school boundaries from authoritative sources. LEAs are not required to participate in this voluntary survey, but NCES hopes to achieve an 85% response rate to meet NCES standards and guidelines. NCES will make every effort to preserve and represent the boundaries as originally submitted by participants, and NCES contractors will coordinate with Census staff to address cases where LEAs report district-level boundaries that are inconsistent with school district boundaries developed and maintained by the Census Bureau for other NCES programs.

NCES is fully aware that school boundary differences may exist between this collection and the Census Bureau’s School District Boundary Survey. NCES will share findings with the Census Bureau when school districts report boundaries that differ from the Census collection. Although, correcting these problems is outside the scope of this project, NCES will work with Census to correct boundaries when needed.

NCES contractors are in charge of preserving the original data, processing the boundaries, performing quality assurance, and maintaining the boundary collection application tool. The digitizing application for developing and submitting boundaries will provide a variety of base layers showing street networks, satellite imagery, topographic features, and Census TIGER/Line boundaries to assist participants with the submission process. The collection tool will provide participants and program administrators with the ability to edit school boundaries, and will facilitate comprehensive boundary updates in subsequent collection years. Any changes submitted after the NCES program manager has approved the final 2013-2014 collection will be applied in the 2015-2016 collection.

NCES recognizes that there are many complexities associated with this school data collection. The system has a comprehensive capacity to store multi-part polygons. This is inherent in the ESRI ARCGIS technology that we will utilize on this project. The fundamental collection and organizational unit is the school. In the rare cases where a school serves different geographic extents for different grade levels, the school boundary will reflect the modal or largest geographic extent. Attendance areas or portions of areas served by more than one school will be organized as separate overlapping boundaries, and boundaries may be organized and represented as multi-part polygons. NCES will strive to enforce appropriate topology to mitigate gaps and overlaps between school attendance boundaries, and between school and school district boundaries. Metadata will be added to the notes on these schools.

To address these issues, NCES has the capability to edit data based on requests from districts and the district will be able to make updates to future collection years. Once the collection is reviewed and approved, a public release of that data will be created and versioned. Once released, that “snap-shot-in-time” will not be editable.

**Dissemination**

Once the collection is reviewed and approved by NCES, these data will be publically available via the NCES website. Although the school boundary collection is not designed or intended for inclusion in the Census TIGER database, the data will be available for use by the Census Bureau and other federal agencies.

The website shall indicate that requests for bulk data dissemination and other questions should be made to the NCES Mapping Program Manager. This collection stores information at the individual school level for all schools provided by the SEA or LEA. From that data, a researcher can determine how many schools within a district have boundaries.

NCES will develop appropriate metadata to document the organization and attributes of the assembled boundaries, and NCES will seek to expand and adjust the metadata in subsequent collections to address the needs and interests of data users. The collection will rely on NCES IDs provided by the Common Core of Data (CCD) to uniquely identify schools. This will allow data users to identify associations between schools and LEAs, and also facilitate integration with school-level data developed by state education agencies. A widget will be available for participating school districts; however, boundaries drawn in the application should not be used to reference student assignments. Users will not be able to extract geographies and tables for specific grades, grade-spans, or geographic extents.

In addition to collecting and disseminating school attendance boundaries, NCES will work with the Census Bureau to design and develop custom tabulations of social, demographic, economic, and housing characteristics from the American Community Survey (ACS). This activity is outside the scope of the proposed data collection, but NCES believes this derivative data product may be of significant interest and value to researchers and the public. All custom tabulations will be subject to review and restrictions determined by the Census Bureau’s disclosure review board, and tabulations will be limited to characteristics of the total population in a school area rather than characteristics specific to children.

Lastly, errors identified in collected data will be resolved by study contractors, under advisement of NCES. Outreach will include presenting at NCES, AERA, and ESRI conferences.

If you have any additional comments or questions, please contact the NCES’ Census Mapping Program Manager, Tai Phan, at tai.phan@ed.gov. We hank you again for your interest in this study.