



June 6<sup>th</sup>, 2013

# MEMORANDUM

**To:** Shelly Martinez, OMB  
**Through:** Kashka Kubzdela, NCES  
**From:** Tai Phan, NCES  
**Subject:** Responses to OMB Passback (5-24-2013 and 6-6-2013) for the School Attendance Boundary Survey (SABS) Clearance Package

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1. Was SABINS a one-time project? Is that why NCES is initiating this collection?

SABINS was a one-time “proof of concept” project that culminated in the collection of school boundaries for approximately 350 school districts for the 2009-2010 school year. It was funded by an NSF grant and was never intended to capture all school attendance boundaries. In contrast, the scope of the NCES collection will include all school attendance boundaries. NCES is initiating this new collection because they recognize the benefits of the SABINS initiative and how much more beneficial it would be to data users to have the information for all school attendance areas.

2. To what degree is NCES mimicking the procedures used in that project? Why or why not?

NCES used the SABINS procedures as a springboard for the future 2013/2014 School Attendance Boundary Survey (SABS). Both collections associate school boundaries with attributes from the CCD and digitize boundaries using TIGER/Line files. However, SABS will not identically mimic SABINS procedures because the SABINS project staff provided many lessons-learned to NCES/Census and clarified the uses for these types of school attendance boundaries. The procedures for this large-scale project differ from SABINS in that SABS will have improved quality assurance procedures, and its processing of the geographies will result in school-specific boundaries with specified grade ranges.

3. SS Part A 12 suggests that the burden per district will not vary by type of submission. This seems unlikely. Please provide more information about how this burden estimate was developed. Please also provide an estimate of how many districts will submit information using each of the three methods.

We have looked at the estimated burden hours again and have revised them. We feel that the table below better represents how the estimated burden per district will vary by type of submission. De facto districts have only a single elementary and/or middle and/or high school, and we will contact to inform them that we will use their school boundaries as their district boundary and give them the opportunity to tell us if the characteristics of their district has changed (e.g. they no longer consist of only a single elementary and/or middle and/or high school). Thus these districts will not need to provide boundary information, and will incur minimal burden, averaging no more than 5 minutes. In turn, non de facto districts with access to shape files will be able to use the online collection and verification system to upload zip files or email the files directly to NCES. Either way, the burden in these situations is estimated at up to 0.5 hours. The burden on non de facto districts that draw their boundaries using the online collection application will vary greatly depending on the number of schools in the districts. It is

estimated that mostly small districts, with up to 24 schools, will draw their boundaries, which for a district with 24 schools is estimated to take approximately three hours. With the expected response rate of approximately 88 percent, this translates into 6,340 estimated total burden hours for each of the collection years (2013 and 2015).

| Respondent type   | Universe (n) | Estimated response rate | Estimated number of respondents | Total number of responses | Estimated hours per instrument | Total burden hours |
|---|--------------|-------------------------|---------------------------------|---------------------------|--------------------------------|--------------------|
| School District Administrator – De facto District       | 8,000        | 1.00                    | 8,000                           | 8,000                     | 0.08                           | 640                |
| School District Administrator –e-mailed/ uploaded File  | 6,560        | 0.75                    | 4,920                           | 4,920                     | 0.5                            | 2,460              |
| School District Administrator – drawn via the digitizer | 1,440        | 0.75                    | 1,080                           | 1,080                     | 3.0                            | 3,240              |
| Total   | 16,000       | 0.88                    | 14,000                          | 14,000                    | --                             | 6,340              |

4. SS B1 – please provide more information about how the 85% response rate estimate was developed.

We expect approximately 0.88 response rate. The expected response rate for SABS is based on the experience in the original SABINS and response targets set for SABS. In SABINS, no limit was set on how many times respondents were contacted or over what period of time, and almost all districts in the end provided data. Financial and time limits in SABS, will not allow us to meet the same level of response rate. We already have boundaries for de facto districts, so the estimated response rate is reflected as 1.00. For the other schools, a target response rate of 0.75 was set, which, based on the SABINS experience we believe is achievable. Across all types of districts this would result approximately in 0.88 response rate.

5. SS B3 – what is the significance of these steps? For example, why does size of enrollment matter in a universe collection?

We have updated these procedures for clarity. The procedures outline that a list of eligible school districts is created and that each district is classified into three types (districts that need changes to boundaries from 2009/10 collection, de facto districts, and all other districts) for different outreach methods. For instance, the districts that need changes will be asked to review and update their boundaries, while the districts with no boundary information from 2009/10 collection will be instructed to create and submit boundaries for the first time.

We have reconsidered and do not need to use enrollment as a criteria in the collection.

6. SS B – what is NCES’s quality control process to ensure that key holders don’t erroneously enter or edit boundaries? Are there checks built in, etc.? What is the process if two adjoining districts supply “competing” boundary information? Has NCES thought about any type of dispute resolution process?

NCES’s quality control process uses custom python scripts to confirm the following: all regular schools within a district have a boundary; every geographical point in the district is served by grades K-12; all attributes in the database correspond and conform to set formats; and school points fall within submitted school boundaries.

During the submission process, if two adjoining school districts supply “competing” boundary information the system will prompt the respondent for an explanation. Similarly, if a submitted school boundary extends across the district boundary the system will prompt the respondent to supply an explanation. Additionally, during the analyst review of boundary submissions, we will contact the districts to mitigate the before mentioned issues.

If the district believes the school district boundaries maintained by the Census Bureau are inaccurate, we will notify the Census Bureau’s school district boundary team to assist in resolving the issue.

7. Appendix A, the questionnaire – the PRA statement has a missing word, some unusual capitalization, and some wording that differs from the typical ED PR statement. Please proofread and resubmit. Also, can we see a

screen shot of the first page/questions? Finally, where it says “please submit or send” – are there directions accessible within the web instrument for how to do that? May we see those instructions, please?

We have edited the PRA statement as requested. We have replaced the wire frames in Appendix A with screen shots from the recently developed boundary digitizer. With regards to the instructions for how to submit or send boundary information, we have added to this submission Appendix F with the SABS 2013 and 2015 Digitizer Instructions.doc.

8. Superintendent advance letter – first 3 sentences seem unnecessarily wordy and somewhat redundant. Also, why would you need to let someone know that you won’t sell their data? Is this a demonstrated concern with this collection?

If you read closely, this new collection is about school attendance boundaries in contrast to the on-going school district boundary data collection. We will revise the opening paragraph so that it reads better by inserting the word “attendance” in all references to the collection to help distinguish between the two collections. Note that the school attendance boundary collection is of a finer granularity than school district boundary collection.

Yes, districts are concerned about companies gathering their boundaries for free and then selling them for profit to companies, such as real estate agencies.

9. Is the “collection of School District boundary data” mentioned in the letter the same as what on the Census Bureau website is called the School District Review Program (SDRP) and what on NCES’s website is called the “Public School Boundary Collection”? If different please explain.?

The “collection of School District boundary data” mentioned in the letter is the same as what on the Census Bureau website is called the School District Review Program (SDRP) and on NCES’s website the “Public School Boundary Collection”.