

**Supporting Statement for
Office of Management and Budget Approval of
U.S. Census Bureau School District Review Program
OMB Control No. 0607-XXXX**

Part A – Justification

Question 1. Necessity of the Information Collection

This request is for the clearance to continue the biennial School District Review Program (SDRP). The U.S. Census Bureau is requesting a revision of a currently approved collection, to cover the annotation and verification phases of the 2015-2016 SDRP. The Census Bureau requests a two-year clearance and a project specific Office of Management and Budget (OMB) Control Number for SDRP. Geography Division (GEO), in coordination with OMB, is removing select programs from the generic Geographic Partnership Programs (GPPs) clearance to individual project specific clearance packages. A project specific clearance for SDRP will allow the Census Bureau to provide enhanced detail and ensure the two-year cycle is uninterrupted.

The National Center for Education Statistics (NCES) sponsors the SDRP so that the Census Bureau can create special tabulations of decennial census data by school district geography. The updated school district boundary information and data obtained through the SDRP, along with the 2010 Census population and income data, current population estimates, and tabulations of administrative records data, are used by the Census Bureau to create estimates of the number of children aged five through seventeen in low-income families residing within each school district. This demographic data is used by the NCES to calculate Federal-funding allocations to the states under Title I of the Elementary and Secondary Education Act as amended by the No Child Left Behind Act of 2001, Public Law (P.L.) 107-110. In addition, school district boundaries collected through the SDRP are used for disseminating American Community Survey (ACS) data.

The SDRP is a voluntary data collection and the NCES invites the fifty states and the District of Columbia to participate in two program phases, annotation (data collection) and verification. Puerto Rico and the Island Areas are not included in the SDRP universe. Poverty estimates and Title I allocations are calculated for these areas at the territorial level using different formulas. The NCES invitation requests each Secretary of State and State Title I Coordinator to nominate a state education official to act as mapping coordinator; a liaison between the Census Bureau and the state's school districts. This allows the SDRP staff to work with fifty-one partners instead of approximately 14,000 local school districts. State mapping coordinators and local school district officials review the Census Bureau's inventory of elementary, secondary, and unified school district boundaries and attribute data and provide boundary and data updates to the Census Bureau where necessary. The mapping coordinator is responsible for determining the best sources for school district boundary and data updates. Mapping coordinators also initiate and maintain contact with all local school district officials to ensure the timely review and submission of any school district updates/corrections to boundaries, names, codes, grade ranges, levels or relationship to other geographic entities. Finally, mapping coordinators review submissions from local or state education officials for accuracy, validity and completeness

before entering data into the Master Address File/Topologically Integrated Geographic Encoding and Referencing (MAF/TIGER) Partnership Software (MTPS) for submission to the Census Bureau.

The SDRP begins in early August (of odd-numbered years) with the mailing of annotation materials on DVD to states and posting of the materials on the Census Bureau's SDRP website for download. Mapping coordinators have four months to return their updates to the Census Bureau. Mapping coordinators will use the Census Bureau's MTPS and Census supplied spatial data in digital shapefile format to identify changes to the boundaries for their school districts. Local school district officials can use the Census Bureau's TIGERweb application to review their boundaries online. After the annotation materials are distributed, SDRP staff conducts webinars to train state officials to use MTPS and the annotation materials needed for the school district boundary and data collection. During the entire SDRP collection and verification, staff provides technical and program support to state participants and interested local school district officials responding to the data collection. SDRP staff also follows up with state participants to ensure updates are completed by the submission deadline. SDRP staff enters the updates into MAF/TIGER before creating verification materials for the states that submitted updates to review and verify the Census Bureau processed their updates correctly.

The SDRP verification phase begins the following March (of even-numbered years) and the mapping coordinator in each state that submitted school district updates prior to the December deadline will have thirty days to review the updated boundaries to verify the Census Bureau processed their information correctly. The Census Bureau will provide verification phase school district boundary shapefiles and the online Census Crowdsourcing Tool (CCT) for state and local school district officials to review the updated boundaries and attribute data. Mapping coordinator has thirty days to review the verification materials and certify them as correct. SDRP staff works with state and local officials to resolve situations where a state is not satisfied with the accuracy of the Census Bureau's school district boundary or data updates, or where a state submission was incorrect or incomplete.

No other Federal agency collects school district boundary and attribute data nor is there a standard collection of this information by the states. The Census Bureau's SDRP is a unique program providing a standard result for use by federal, state, local, and tribal governments and by commercial, private, and public organizations. The primary purpose of this school district boundary and data collection is for the Census Bureau to produce annual estimates of children ages five through seventeen in poverty by school district for the SDRP sponsor NCES.

Each December, the Census Bureau releases the annual estimates of poverty by school district and the NCES releases the annual Title I funding allocations by school district geography for the fifty states and the District of Columbia. The Census Bureau allows states and school districts a ninety-day period to challenge a new poverty estimate or Title I allocation. SDRP staff will investigate any challenge claiming the Census Bureau made an error in preparing or processing information to define geographic boundaries (e.g., school district boundaries or legal entity boundaries). Challengers often claim the Census Bureau used incorrect or outdated school district boundaries or data to calculate the poverty estimates, which were used by the NCES to

calculate the Title I funding allocations. SDRP staff will investigate the accuracy and age of the boundaries and school district data used. A successful challenge will result in a revised estimate. The Census Bureau legal authority for conducting activities in this document comes from Title 13 United States Code, Sections 16, 141, and 193. The NCES legal authority for conducting activities in this document comes from Title I, Part A of the Elementary and Secondary Education Act.

Question 2. Needs and Uses

The SDRP information is used to:

- 1) serve as the primary source of information for estimating the number of children ages five through seventeen, living at or below the poverty level in each school district;
- 2) serve as the primary national source of spatial information regarding new or dissolved school districts, consolidations, and boundary changes to existing school districts;
- 3) serve as the primary source for school district boundary information as a framework layer of the National Spatial Data Infrastructure for The National Map and the data.gov website.

Information quality is an integral part of the pre-dissemination review of the information disseminated by the Census Bureau. Information quality is also integral to the information collections conducted by the Census Bureau and we incorporate it into the clearance process required by the Paperwork Reduction Act of 1995.

Question 3. Use of Information Technology

The Census Bureau continually researches and develops new technology in the fields of Geographic Information Systems (GIS) and Web services to lessen the burden of our SDRP partners. The Census Bureau provides the MTPS and CCT free of charge for all SDRP participants to participate digitally. The MTPS is a specifically designed boundary and feature update tool that guides our SDRP partners through each step of the update process, and the software will format and package their annotation phase updates for easy submission to the Census Bureau for processing. The web-based CCT is specifically designed software that allows participants to review school district boundary verification shapefiles from the updated MAF/TIGER to verify the Census Bureau processed their submitted boundary and data information correctly.

The Internet also plays a significant role in providing the public access to Census Bureau boundary data. The MTPS and CCT, along with their accompanying spatial data files, are available for download free from the Census Bureau's SDRP Internet site. The Census Bureau also provides the MTPS software and SDRP annotation materials to state participants on DVD. The Census Bureau also encourages state participants to involve local school district officials in the annotation review by using the online TIGERweb mapping service to view their boundaries and relationship to other geographic areas and imagery.

The Census Bureau is currently developing the Geographic Update Partnership Software (GUPS), which will eventually give our partners in multiple Census Bureau programs the ability

to make updates to their boundaries on the Internet. For SDRP in 2015 and 2016, the Census Bureau staff will test GUPS as a replacement for MTPS.

State SDRP partners also provide their responses electronically. A state partner may report a “no change” response through e-mail. In addition, a partner must send in their school district boundary and data updates electronically through the Secure Web Incoming Module (SWIM).

Question 4. Efforts to Identify Duplication

State SDRP partners at the state departments of education are responsible for determining the sources they will use for school district boundary updates. The school district boundary data can be best obtained and updated from local and regional school district officials, and city and county planning and tax assessing agencies. The Census Bureau is the designated federal agency through OMB Circular A-16 steward for the Governmental Units and Administrative and Statistical Boundaries Data Theme. There is no similar federal boundary data collection occurring on a consistent national basis.

Question 5. Minimizing Burden

To reduce the burden on respondents, the Census Bureau provides the program software and spatial files to participants. The Census Bureau provides the MTPS software for use by state participants during the SDRP annotation phase, and the CCT software for participants to use during the verification phase.

Additionally, the Census Bureau no longer provides maps in paper or Adobe format. The online TIGERweb map viewer allows anyone to view and print their school district boundaries and overlay other layers of geography, features, and imagery.

The Census Bureau also offers states participating in the Boundary Quality Assessment and Reconciliation Project (BQARP), the opportunity to report school district boundary updates along with their legal boundary and feature changes in order to reduce the burden on local governments and avoid the duplication of effort. State Title I coordinators must certify the accuracy and age of these school district boundaries before they can be accepted by the Census Bureau.

Question 6. Consequences of Less Frequent Collection

The SDRP must continue on a biennial basis. Conducting the survey less frequently would greatly reduce the accuracy and age of the school district boundaries and data used to calculate annual estimates of children in poverty by school district, which is the basis for the Title I funding allocations. The SDRP is the only current federal source of a nationally consistent inventory of spatial school district boundaries and data.

Question 7: Special Circumstances

Data collection for SDRP follows the guidelines of OMB when conducting the collection.

Question 8: Consultations Outside the Agency

Discussions with the NCES regarding the purpose, methodology, and issues with SDRP continue through the duration of the program. The Census Bureau consulted with the following individual at NCES during the 2013-2014 SDRP:

Mr. William Sonnenberg
National Center for Education Statistics
1990 K St. NW, Room 9080
Washington, DC 20006
Phone: 202-502-7453
Email: william.sonnenberg@ed.gov

The Census Bureau also discussed the purpose, methodology, and problems of the SDRP with state and local officials, plus a network of frequent users of Census Bureau data during periodical national and local meetings. Discrepancies in maps are periodically discussed with state and local education officials during problem resolution. As stakeholders in the accuracy of school district boundary information and the resulting poverty estimates and Title I funding allocations, state respondents are cooperative and willing to provide SDRP information. The following is a representative sample of the individuals we have consulted with during the 2013-2014 SDRP.

Mr. Matthew Reilly
New York State Education Department
Educational Management Services
89 Washington Ave.
Albany, New York 12234
Phone: 518-474-3927
Email: mreilly@mail.nysed.gov

Ms. Karen Lane
Indiana Department of Education
Division of Data Collection & Reporting
151 W Ohio St.
Indianapolis, Indiana 46240
Phone: 317-232-0818
Email: klane@doe.in.gov

Mr. Ken Hughes
Kansas Legislative Research Department
300 SW 10th St.
Topeka, Kansas 66612
Phone: 785-296-0448
Email: kenneth.hughes@klrd.ks.gov

Mr. Robert Curtin
Department of Elementary and Secondary
Education
75 Pleasant St.
Malden, Massachusetts 02148
Phone: 781-338-3582
Email: rcurtin@doe.mass.edu

Mr. Everett Root
Center for Geographic Information
Romney Bldg. 10th Floor
111 S Capitol Ave.
Lansing, Michigan 48933
Phone: 517-373-7910
Email: roote@michigan.gov

Ms. Michelle Stephens
Nebraska Department of Education
301 Centennial Mall S
Lincoln, Nebraska 68509
Phone: 402-471-2487
Email: michelle.stephens@nebraska.gov

Mr. Frank Lavdas
New Jersey Department of Education
Office of School Funding
100 Riverview Plaza
Trenton, New Jersey 08625
Phone: 609-984-4946
Email: geo@doe.state.nj.us

Mr. Scott Freburg
Minnesota Department of Education
1500 Highway 36 W
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Dr. Heather Boughton
Ohio Department of Education
25 S Front St. Mail Stop 708
Columbus, Ohio 43215
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Email: heather.boughton@ode.state.oh.us

During conversations with these individuals, comments were favorable concerning the survey and all issues are resolved.

The Federal Register Notice announcement publication date is on May 11, 2015 (80 FR pp. 26892-26893). GEO received no comments during the consideration period ending July 10, 2015.

Question 9. Paying Respondents

We do not pay respondents or provide them with gifts for responding to this survey.

Question 10. Assurance of Confidentiality

All information requested in this survey is public information of a non-sensitive nature and is available to any person requesting it from participating officials. The NCES informs the respondent of the voluntary nature of this survey in the introductory letter. In addition, the Census Bureau provides the OMB approval number, expiration date, and reasons for data collection.

Question 11. Justification for Sensitive Questions

There are no questions of a sensitive nature in this survey.

Question 12. Estimate of Hour Burden

The maximum number of respondents/estimated burden hours for the 2015-2016 SDRP are:

Maximum Number of Respondents:

Annotation Phase: 51.

Verification Phase: 51.

Estimated Time Per Response:

Annotation Phase: 30 hours.

Verification Phase: 10 hours.

Estimated Burden Hours:

Annotation Phase: 1,530 hours.

Verification Phase: 510 hours.

Estimated Total Burden Hours: 2,040 hours.

Estimated Total Annual Cost to Public: \$0.

Question 13. Estimate Cost Burden

The Census Bureau does not expect respondents to incur any cost other than that of their time to respond. The information requested is of the type and scope normally contained in school district and local education department offices, and city and county government planning and tax assessing agencies. No special hardware or accounting software or system is necessary to provide answers to this information collection. Therefore, respondents should not incur any capital, start-up costs or system maintenance costs in responding. Further, purchasing of outside accounting or information collection services, if performed by the respondent, is part of usual and customary business practices and not specifically required for this information collection.

Question 14. Cost to Federal Government

The estimate to conduct the SDRP geography data collection is approximately \$900,000 for each clearance year. The Geographic Areas Branch and the Geographic Programs Budget Branch within GEO have reviewed all requirements for conducting the SDRP, including material and person-hour costs to arrive at this estimate and have determined that the resources are available for efficient administration of the SDRP.

Question 15. Reason for Change in Burden

The Census Bureau does not expect a change in burden for the 2015-2016 SDRP.

Question 16. Project Schedule for Each Survey Year

<u>Month (SDRP odd-numbered year)</u>	<u>Activity</u>
January	Small Area Estimates Branch (SAEB) provides customer requirements to GEO.
March	Change Request to update SAEB requirements submitted for approval, circulated for signatures and baselined.
March	Update SDRP website.
April	Compare SAEB inventory to MAF/TIGER and resolve discrepancies.
April	Review draft of NCES Invitation Letter, prior mapping coordinators list, and National States Geographic Information Council contact list.
June	NCES emails invitation to the fifty states and the District of Columbia to participate in SDRP.
June	SDRP receives responses from state Title I Coordinators and Mapping Coordinators.
June	SDRP sends acknowledgement and responsibilities email to each mapping coordinator.
July	Create SDRP partnership shapefiles and inventory listings. Review SDRP annotation products for the participants (emails, shapefiles, inventory listings, etc.).

July	SDRP shapefiles, MTPS software, Annotation Phase Listings, and 508 Compliance guidelines delivered for posting to website.
August	Mailout of SDRP Annotation Phase materials and notification of posting of materials to SDRP website.
September	Conduct webinar training for state participants.
December	Deadline for submissions (no guarantee of verification for late submissions).
February	Deadline for submitting school district changes during the annotation phase.
March	Review of verification materials begins.
April	Deadline for submitting school district changes during verification phase.
November	Release of preliminary poverty estimates based on the updated school district geographic framework.
December	SDRP Annotation Phase ends. States submitting updates by deadline will receive verification materials.
<u>Month (SDRP odd-numbered year)</u>	<u>Activity</u>
January	Late Annotation Phase submissions accepted. States submitting updates after deadline will not receive verification materials.
January	Begin creation of Verification Phase shapefiles and inventory listings (only for states that submitted updates).
February	Post Verification Phase shapefiles and inventory listings to website.
February	SDRP Verification Phase begins. Participants use Census Crowdsourcing Tool to review that updates were made correctly.
February	SDRP Verification Phase ends.
May	SDRP Verification Phase updates entered in MAF/TIGER.
May	ACS benchmark completed.
June	SDRP Deliverable Inventory Listings for SAEB created and reviewed.
June	SDRP Deliverable Inventory Listings delivered to SAEB.
August	SDRP Deliverable shapefiles and geodatabase created and reviewed.
September	SDRP Deliverable shapefiles and geodatabase delivered to SAEB.
November	SAEB releases poverty estimates to NCES.

Question 17. Request to Not Display Expiration Date

GEO will display the expiration date on the Information Collection forms and on the Privacy Act Notice given to respondents.

Question 18. Exception to the Certification

There are no exceptions.

Attachments

NCES Invitation Letter to Title I Coordinator

GEO Letter to Participants

SDRP: Quick Start Guide to Reporting School District Updates

SDRP: About the SDRP and the Materials You Receive

SDRP: User Guide for the Excel Submission Log

SDRP: User Guide for the MTPS

SDRP: TIGERweb Map Viewer for Review of School Districts

SDRP: Guidelines for Using the Census Bureau Crowdsourcing Application for the Verification Phase of the 2015-2016 SDRP