

**Department of Commerce
United States Census Bureau
OMB Information Collection Request
U.S. Census Bureau School District Review Program
OMB Control Number 0607-0987**

Part A – Justification

Question 1. Necessity of the Information Collection

This request is for the clearance to continue the School District Review Program (SDRP) on an annual basis. The U.S. Census Bureau is requesting a revision of a currently approved collection, to cover the annotation and verification phases of the 2019, 2020, and 2021 SDRP. The Census Bureau requests a three-year clearance.

The National Center for Education Statistics (NCES) sponsors the SDRP to assist the Census Bureau in the creation of special tabulations of census data by school district geography. 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 Every Student Succeeds Act of 2015, Public Law (P.L.) 114-95. In addition, school district boundaries collected through the SDRP are used for disseminating American Community Survey (ACS) data.

The SDRP is a voluntary program. 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. 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. Mapping coordinators also ensure that all school districts affected by a change are in agreement before it is submitted to the Census Bureau. Finally, mapping coordinators review submissions from local or state education officials for accuracy, validity, and completeness before entering data into the Geographic Update Partnership Software (GUPS) and/or the submission log for submission to the Census Bureau. The SDRP begins each August with the mailing of annotation materials to registered 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 GUPS and Census Bureau 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 Topologically Integrated Geographic Encoding and Referencing web application to review their boundaries online. After the annotation materials are distributed, SDRP staff conducts a webinar to train state officials to use GUPS 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 follow up with state participants to ensure updates are completed by the submission deadline. SDRP staff enters the updates into Master Address File/Topologically Integrated Geographic Encoding and Referencing (MAF/TIGER) database 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 April. The state mapping coordinator, 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 SDRP verification module in GUPS for state officials to review the updated boundaries and attribute data. The mapping coordinator has thirty days to review the verification materials and certify them as correct. SDRP staff works with state 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, and local 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). SDRP staff will investigate the accuracy of the boundaries and school district data used. A successful challenge may result in a revised estimate.

The Census Bureau's 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 as amended by the Every Student Succeeds Act of 2015, Public Law (P.L.) 114-95.

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, in families in poverty 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. *The National Map* is a collaborative effort among the USGS and other federal, state, and local partners to improve and deliver topographic information for the Nation. Information quality is an integral part of the pre-dissemination review and the information collections conducted by the Census Bureau. It is incorporated 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 GUPS free of charge for all SDRP participants to participate digitally. GUPS 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 SDRP verification module in GUPS 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 plays a significant role in providing the public access to Census Bureau boundary data. GUPS, along with the accompanying spatial data files, are available for download free from the Census Bureau's SDRP internet site. The Census Bureau also provides GUPS and SDRP annotation materials to state participants on DVD.

The Census Bureau encourages state participants to involve local school district officials in the annotation review by using the online TIGERweb (Topologically Integrated Geographic Encoding and Referencing) mapping service to view their boundaries and relationship to other geographic areas and imagery.

State SDRP partners provide their responses electronically. A state partner may report a "no change" response through email. 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 GUPS for use by state participants during the SDRP annotation phase, and the SDRP verification module in GUPS 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.

State Title I coordinators must certify the accuracy of these school district boundaries before they can be accepted by the Census Bureau.

Question 6. Consequences of Less Frequent Collection

The SDRP will now operate on an annual basis. Conducting the survey less frequently would greatly reduce the accuracy 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 2015-2016 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 periodic 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 2015-2016 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

Mr. Jeff Milkey
Indiana Department of Education
151 W Ohio St.
Indianapolis, Indiana 46240
Phone: 317-234-1332
Email: jmilkey@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. Joshua Ross
Michigan Department of Technology
111 S Capitol Ave.
Lansing, Michigan 48933
Phone: 517-241-8840
Email: rossj@michigan.gov

Mr. Jeff Timm
Nebraska Office of the CIO
501 S 14th Street
Lincoln, Nebraska 68508
Phone: 402-471-1453
Email: jeff.timm@nebraska.gov

Ms. Susan Ecks
New Jersey Department of Education
Office of School Finance
100 Riverview Plaza
Trenton, New Jersey 08625
Phone: 609- 292-9973
Email: susan.ecks@doe.state.nj.us

Mr. Scott Freburg
Minnesota Department of Education
1500 Highway 36 W
Roseville, Minnesota 55113
Phone: 651-582-8789
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Mr. Eben Dowell
Ohio Department of Education
25 S Front St.
Columbus, Ohio 43215
Phone: 614-752-8730
Email: eben.dowell@ode.state.oh.us

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

The public had the opportunity to review and submit comments on the SDRP during the 60-Day Notice of Proposed Information Collection. The notice for public comment, titled “School District Review Program Federal Register Notice” was published in Federal Register January 31, 2018 (Vol., 83 FR 4464, pp. 4464-4465). The Census Bureau received zero comments during the 60-day period.

Question 9. Paying Respondents

The Census Bureau does 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 invitation 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 2019 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: 2040 hours.

Estimated Total Annual Cost to Public:

(Total Burden Hours) x (GIS Tech median hourly wage) = Estimated Total Annual Cost to Public.

$$(2040 \text{ Hours}) \times (\$29.75) = \$60,690.00$$

The Census Bureau estimates the cost burden by multiplying the total annual hour burden 2040 by the average hourly wage \$29.75¹. The Census Bureau provides free and stand-alone software with drafted plans and shapefiles by DVD or downloadable through the Census Bureau's website.

Question 13. Estimate Cost Burden

Participation in SDRP is voluntary. Participants should not incur any cost other than staff time.

Question 14. Cost to Federal Government

The estimate to conduct the SDRP geography data collection is approximately \$1,200,000 for each clearance year. This includes cost for the Census Bureau's Headquarters and National Processing Center (NPC).

Question 15. Reason for Change in Burden

The Census Bureau does not expect a change in burden for the 2019, 2020, and 2021 SDRP.

Question 16. Project Schedule for Survey Year

<u>Month</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.

¹ Based on average hourly wage rate of the five common position types that respond to SDRP. Positions include Geographer, Urban/Regional Planner, Cartographer/Photogrammetrist, Surveyor, and Surveying/Mapping Technician. Obtained from the following data source: Bureau of Labor Statistics (BLS); May 2015 National Industry-Specific Occupational Employment and Wage Estimates.

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, GUPS software, Annotation Phase Listings, and 508 Compliance guidelines delivered for posting to website.
August	Mail out of SDRP Annotation Phase materials and notification of posting of materials to SDRP website.
October	Conduct webinar training for state participants.
December	SDRP Annotation Phase ends. States submitting updates by deadline will receive verification materials.
January	Begin creation of Verification Phase shapefiles and inventory listings (only for states that submitted updates).
March	Post Verification Phase shapefiles and inventory listings to website.
April	SDRP Verification Phase begins. Participants use GUPS Verification module to review that updates were made correctly.
April	Deadline for submitting school district changes during verification phase.
July	SDRP Deliverable Inventory Listings for SAEB created and reviewed.
July	SDRP Deliverable Inventory Listings delivered to SAEB.
August	SDRP Deliverable geodatabase created and reviewed.
September	SDRP Deliverable geodatabase delivered to SAEB.
December	Release of preliminary poverty estimates based on the updated school district geographic framework

Question 17. Request to Not Display Expiration Date

No exemption is expected.

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: SDRP Annotation Phase Respondent Guide.

SDRP: SDRP Verification Guide.

Email Templates