

SUPPORTING STATEMENT A

**U.S. Department of Commerce
U.S. Census Bureau
School District Review Program
OMB Control No. 0607-0987**

Abstract

The School District Review Program (SDRP) is one of many voluntary geographic partnership programs. The SDRP collects school district information and boundaries to update the U.S. Census Bureau's geographic database of addresses, streets, and boundaries. The Census Bureau uses its geographic database to tie demographic data from surveys and the decennial census to locations and areas, such as cities, school districts, and counties. To tabulate statistics by localities, the Census Bureau must have accurate addresses and boundaries.

While the geographic programs differ in requirements, timeframe, and participants, SDRP and the other geographic programs follow the same basic process. The Census Bureau invites eligible participants to the program and requests state officials to review and update the school district information the Census Bureau has on file. The school district information obtained through this program will assist in forming the Census Bureau's estimates of the number of children age five through seventeen, in families in poverty, for each school district.

State officials will provide the Census Bureau with updates and corrections to the federal School District Local Education Agency (SDLEA) identification numbers, school district boundaries, school names, grade ranges, and levels for which each school district is financially responsible.

These Census Bureau estimates are the basis of the Title I allocation for each school district. The SDRP is of vital importance for each state's allocation under Title I of the Elementary and Secondary Education Act (ESEA) as amended by Every Student Succeeds Act of 2015, Public Law 114-95. The U.S. Department of Education uses these estimates to allocate more than \$14 billion in Title I funding annually.

The mapping coordinator collects updates from local school districts, state education officials, county planners, and state data centers, and ensures completion of submissions within the SDRP's timeframe. The respondents for the SDRP are the Title I coordinators and mapping coordinators from the fifty states and the District of Columbia.

The SDRP encompasses Type 1 and Type 2 school districts as defined by the National Center for Education Statistics (NCES). Type 1 is a local school district that is not a component of a supervisory union. Type 2 is a local school district component of a supervisory union sharing a superintendent and administrative services with other local school districts.

The SDRP consists of two phases – the Annotation and Verification Phases. In the Annotation Phase, the Census Bureau provides mapping coordinators with materials containing the most current school district boundaries and information the Census Bureau has on file for their state. Mapping coordinators review the data and submit changes to the school district boundaries or associated information to the Census Bureau. The Census Bureau reviews and processes the information submitted by mapping

coordinators, and the Census Bureau updates all verified changes into the Master Address File/Topologically Integrated Geographic Encoding and Referencing (MAF/TIGER) database. In the Verification Phase, mapping coordinators verify that the Census Bureau accurately and completely updated the MAF/TIGER database with updates submitted during the Annotation Phase.

Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

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 an extension of a currently approved collection, to cover the annotation and verification phases of the 2022, 2023, and 2024 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 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 agree before submission 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/September with the 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 (TIGER) web application, entitled TIGERweb, 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 one week 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. 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, and there is not 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.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The SDRP information is used to:

- 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.
- Serve as the primary national source of spatial information regarding new or dissolved school districts, consolidations, and boundary changes to existing school districts.
- 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 United States Geological Survey 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 of the information disseminated by the Census Bureau (fully described in the Census Bureau's Information Quality Guidelines). Information quality is also integral to the information collections conducted by the Census Bureau and is incorporated into the clearance process required by the Paperwork Reduction Act.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

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. All materials, GUPS, accompanying spatial data files, inventory listings, and participant guides are available for download free from the Census Bureau's SDRP internet site.

The Census Bureau 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.

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).

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.

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.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize 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.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The SDRP operates 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.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- requiring respondents to report information to the agency more often than quarterly; There are no special circumstances in the SDRP that require state education official/mapping coordinators to report changes more often than yearly.
- requiring respondents to prepare a written response to a collection of information in fewer

than 30 days after receipt of it; There are no special circumstances that require state education official/mapping coordinators to prepare a written response in fewer than 30 days from the start of SDRP.

- requiring respondents to submit more than an original and two copies of any document; There are no special circumstances in the SDRP that require state education official/mapping coordinators more than an original and two copies of any document they submit.
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; There are no special circumstances in SDRP that require state education official/mapping coordinators to retain records for more than three years.
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study; There are no special circumstances because SDRP is not a statistical survey.
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB; There are no special circumstances in SDRP that require the use of a statistical data classification that has not been reviewed and approved by OMB.
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or There are no special circumstances in SDRP that violate confidentiality.
- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law. There are no special circumstances in SDRP that require the inclusion of proprietary trade secrets or other confidential information.

In summary, there are no special circumstances for this collection. Data collection for SDRP follows the guidelines of OMB when conducting the collection.

- 8. If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

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 2021 SDRP:

Mr. Doug Gevert
Study Director, Education Demographic and Geographic Estimates
National Center for Education Statistics
550 12th Street SW
Washington, DC 20202
Phone: 202-245-8230
Email: douglas.gevert@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 2021 SDRP.

Mr. Eric Sandberg
Alaska Department of Labor and Workforce
Development
1111 West 8th Avenue, Suite 301
Juneau, Alaska 99811-5501
Phone: (907) 465-2437
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Mr. Jeff Milkey
Indiana Department of Education
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Indianapolis, Indiana 46240
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Mr. Shelby Johnson
Arkansas GIS Office
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Little Rock, Arkansas 72201
Phone: 501-682-2943
Email: shelby.johnson@arkansas.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

Ms. Julia Schacherl
Texas Legislative Council
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Austin, Texas 78701
Phone: 512-463-1143
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Ms. Anne Bordonaro
Vermont Agency of Education
1 National Life Drive
Montpelier, Vermont 05620
Phone: 802-828-1388
Email: anne.bordonaro@vermont.gov

Mr. Timothy Lauxmann
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111 S Capitol Ave.
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Phone: 517-241-8840
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Mr. John Watermolen
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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

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Phone: 651-582-8789
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During conversations with these individuals, comments were favorable concerning the survey and all issues are resolved. The Federal Register Notice announcement publication date was on December 22, 2020, Vol. 85, No. 246 (pages 83511, 83512, 83513). There were no public comments received in response to the publication of the Presubmission Notice.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

The Census Bureau does not pay respondents or provide them with gifts for responding to this survey.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

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.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature included in the SDRP survey.

12. Provide estimates of the hour burden of the collection of information.

- Indicate the number of respondents, frequency of response, annual hour burden, and an

explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under 'Annual Cost to Federal Government' (Item #14).

Table 1: Estimated Annualized Respondent Burden Hours

Information Collection	Estimated Annual # of Respondents (a)	Estimated Annual # of Responses/ Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Burden Hours/ Response (d)	Total Annual Burden Hours (e) = (c) x (d)
SDRP Annotation Phase	51	1	51	30 hours	1,530 hours
SDRP Verification Phase	51	1	51	10 hours	510 hours
Totals	102	1	51	40 hours	2,040 hours

Table 2: Estimated Annualized Respondent Costs

Type of Respondent/ Occupational Title	Number of Respondents	Number of Responses per Respondent	Average Burden per Response	Hourly Wage Rate*	Total Burden Costs
Mapping Coordinator	51	1	1,530	\$33	\$50,490
Mapping Coordinator	51	1	510	\$33	\$16,830
Total	51	1	2,040	\$33	\$67,320

See * note for Hourly Wage Rate column

*Hourly wage rate derived from the May 2019 National Occupational Employment and Wage Estimates report located at the following website: <<https://www.bls.gov/bls/blswage.htm>> averaging five common position types that normally respond to Census Bureau geographic programs, e.g., Geographer (\$39.41), Cartographer/Photogrammetrist (\$33.55), Surveyor (\$32.66), Surveying/Mapping Technician (\$23.32), and Urban/Regional Planner (\$37.38).

The Census Bureau estimates participants will need no more than 40 hours to plan, prepare, and submit their SDRP responses. Smaller states with less population, fewer counties, and fewer schools, will need less time than larger states to complete their delineation work. The total maximum number of burden hours for the timeframe of the operation is 2,040 hours (i.e., 51 participants x 40 hours).

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

Other than the staff time to prepare the submission, there are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Question 12, 13, and 14 in a single table.

Table 3: Annualized Costs to the Federal Government

Staff	Grade/Step	Total Days Effort (One Fiscal Year)	Flat Annual Cost	Total Annualized Cost to Gov't
Federal Oversight				
Geography Division				
<i>School District Review Program</i>				
Branch Chief	14/5	48		\$48,000
Team Lead (3)	13/5	279		\$237,000
Staff (5)	12/5	772		\$550,000
<i>Partnership Communication and Outreach Branch</i>				
Branch Chief	14/5	2		\$2,000
Team Lead	13/5	16		\$14,000
Staff(2)	12/5	36		\$26,000
<i>Cartographic Products and Services Branch</i>				
Branch Chief	14/5	1		\$1,000
Team Lead	13/5	8		\$7,000
Staff (6)	12/5	39		\$33,000
<i>Address Frame Update Branch</i>				
Branch Chief	14/5	1		\$1,000
Team Lead	13/5	1		\$1,000
Staff (1)	12/5	6		\$4,000
Decennial Information Technology Division				
Programming Staff	14/5, 13/5, 12/5			\$30,000
Contractor Expenses				
Five9		40		\$36,000
ASTS		260		\$340,000
Total Annual Cost to the Government				\$1,330,000

The estimate to conduct the SDRP geography data collection is approximately \$1,330,000 annually (each clearance year).

15. Explain the reasons for any program changes or adjustments reported in ROCIS.

The Census Bureau does not expect a change in burden for the 2022, 2023, and 2024 SDRP.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

In order to create accurate tabulations to support Title I funding allocations, the Census Bureau creates a pseudo school district for each school district that is financially responsible for providing education for one set of grades in one geographic area and financially responsible for a different set of grades in a different geographic area. For example, a school district that is financially responsible for grades K-12 in one area is also financially responsible for grades 9-12 in a different area where it shares financial responsibility with an elementary school district. The pseudo district is always associated with a regular district so that the regular district is given “credit” for the additional financial responsibility.

The National Center for Education Statistics (NCES) sponsors the School District Review Program (SDRP), enabling the Census Bureau to create poverty and population estimates by school district geography. The poverty and population estimates produced by the Census Bureau are of vital importance for each state’s allocation under Title I, Part A of the Elementary and Secondary Education Act (ESEA) as amended (Public Law 114-95).

Below is the annual SDRP schedule.

Table 4: SDRP Schedule

Date	Activity
Early summer	NCES emails invitation to the fifty states and the District of Columbia to participate in SDRP. The Census Bureau receives responses nominating mapping coordinators for each state.
August/September	SDRP Annotation Phase materials are posted to the SDRP website and mapping coordinators are notified of the start of the annotation phase.
October	Conduct webinar training for state participants.
December	SDRP Annotation Phase ends. States submitting updates by deadline will receive verification materials.
March/April	SDRP Verification Phase materials are posted to the SDRP website and mapping coordinators are notified of the start of the verification phase.
April	Deadline for submitting school district changes during verification phase.
July	SDRP Deliverable Inventory Listings delivered to the Small Area Estimates Branch (SAEB).

Date	Activity
September	SDRP Deliverable geodatabase delivered to SAEB.
December	Release of preliminary poverty estimates based on the updated school district geographic framework.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The Census Bureau will display the expiration date for OMB approval on the information collection instruments and the notification to participants announcing the program.

18. Explain each exception to the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions. The agency certifies compliance with [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#).

Attachments:

NCES Invitation Letter.

Census Welcome Letter.

SDRP: Quick Start Guide.

SDRP: SDRP Respondent Guide.

SDRP: SDRP Verification Guide.

Email Templates.