

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 a U.S. Department of Education National Center for Education Statistics (NCES) sponsored program conducted annually by the Census Bureau. It is of vital importance for each state's allocation of federal funding under Title I of the Elementary and Secondary Education Act as amended by the Every Student Succeeds Act of 2015, Public Law 114-95. School district information submitted through this program, along with the decennial census population, Small Area Income and Poverty Estimates, and current population estimates, are used in forming the Census Bureau's estimates of the number of children ages 5 through 17 in families in poverty for each school district. The U.S Department of Education uses these estimates to allocate more than \$17 billion annually in Title I funds.

Respondents to the SDRP are the mapping coordinators and Title I Coordinators from the fifty states and the District of Columbia. The NCES also anticipates the inclusion of the Commonwealth of Puerto Rico within the next three years. Mapping coordinators are designated by the state departments of education and are tasked with reviewing and providing updates for school district boundaries, federally assigned school district local education agency (SDLEA) codes, names, grade ranges, and levels to the Census Bureau. Title I Coordinators are responsible for overseeing the SDRP and reviewing all materials.

There are two phases to the SDRP: Annotation and Verification. During the Annotation Phase, mapping coordinators review the school district data provided by the Census Bureau and submit necessary updates. During the Verification Phase, mapping coordinators verify the updates are accurate in comparison to their Annotation Phase submission. A list of materials used to support the SDRP is included at the end of this document.

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.**

The SDRP is a vital annual survey that supports the calculation and allocation of the federal funding provided to states under the legal authority of Title I of the Elementary and Secondary Education Act as amended by the Every Student Succeeds Act of 2015, Public Law 114-95. The Census Bureau conducts the SDRP on behalf of the NCES – the Census Bureau's legal authority for conducting these activities is codified in Title 13 United States Code, Section 16, 141, and 193 – and solicits requests from all 50 states and the District of Columbia to provide the Census Bureau with their latest updates to school district boundaries and school district attribute information. The NCES also anticipates the inclusion of the Commonwealth of Puerto Rico within the next three years. This

information, along with existing population, income, and poverty tabulations, is used by the Census Bureau to create single-year estimates of the number of school-age children ages 5 through 17 in families in poverty. The NCES uses these single-year estimates to calculate and distribute \$17 billion in Title I funds annually.

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 principal use of information collected during the SDRP is to support the Census Bureau's calculation of the single-year estimates of the number of school-age children ages 5 through 17 in families in poverty. These single-year estimates are provided to the NCES to calculate and distribute Title I funds to eligible school districts as provisioned under Title I of the Elementary and Secondary Education Act as amended by the Every Student Succeeds Act of 2015, Public Law 114-95.

Since the SDRP is a public, national program, collected information is also included in annual public data products produced by the Census Bureau and serves as a standardized framework for school district spatial and attribute information that is used in various online mapping and data portal platforms. Examples include the Census Bureau's TIGERweb mapping viewer, data.gov, data.census.gov, and the USGS National Map Viewer. Public use of this information is often found to support similar applications at a state level, as well.

Information quality is an integral part of the pre-dissemination review of the information disseminated by the Census Bureau (fully described in Census Bureau 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.

Program materials and collection of responses are delivered and accepted electronically. This reduces participant burden and ensures accurate data submissions.

All program materials required to respond to the SDRP are made available to participants through the SDRP website hosted at census.gov. Participants can access this information at any time during the collection period.

The Census Bureau offers participants multiple methods of electronic response. The first method of electronic response is the Geographic Update Partnership Software (GUPS). Developed by the Census Bureau, GUPS is a free geographic information systems (GIS) software – offered as a standalone desktop software package and an online web mapping application – that allows mapping coordinators to easily process and submit school district boundary and attribute updates.

The second method of electronic response is the Submission Log. For states that have school district updates to submit that do not require the full use of GUPS, the Submission Log is a Microsoft Excel file provided by the Census Bureau with a predefined template that guides mapping coordinators in recording their updates.

The third option is response by email. In cases where a state may not have any updates to submit to the SDRP, participants can send an email to the Census Bureau indicating that they will not be reporting any changes to the SDRP.

Participants responding to the SDRP with a GUPS submission or Submission Log are required to send their files electronically to the SDRP using a Census Bureau secure online data sharing portal. The portal guides participants in uploading their submission files to the Census Bureau while providing the Census Bureau with submission tracking for records management.

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.

The SDRP is a unique collaboration between the Census Bureau and the NCES. There is no other federal government agency or program that collects, tabulates, and disseminates school district data to support a state's allocation of federal funding under Title I of the Elementary and Secondary Education Act as amended by the Every Student Succeeds Act of 2015, Public Law 114-95. 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 respondent burden, the Census Bureau posts the software (e.g., GUPS) and program materials online through census.gov for immediate access and accepts electronic responses from respondents to the SDRP.

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.

As an annual program, conducting the SDRP less frequently would greatly reduce the accuracy of the school district boundaries and data used to calculate single-year estimates of the number of school-age children ages five through seventeen in families in poverty. The data are used by the NCES to calculate a state's funding as provisioned under Title I of the Elementary and Secondary Education Act as amended by the Every Student Succeeds Act of 2015, Public Law 114-95. 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;

- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax 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;
- requiring 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
- 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.

The SDRP data collection does not require any of the special circumstances mentioned above.

- The SDRP is an annual program. There are no special circumstances that require state education officials and mapping coordinators to report changes more often than annually.
- There are no special circumstances that require state education officials and mapping coordinators to prepare a written response in fewer than 30 days from the start of the SDRP.
- There are no special circumstances in the SDRP that require state education officials and mapping coordinators to submit more than an original and two copies of any document they submit.
- There are no special circumstances in the SDRP that require state education officials and mapping coordinators to retain records for more than three years.
- There are no special circumstances because the SDRP is not a statistical survey.
- There are no special circumstances in the SDRP that require the use of a statistical data classification that has not been reviewed and approved by OMB.
- There are no special circumstances in the SDRP that requires a participant pledge of confidentiality.
- There are no special circumstances in the SDRP that require the inclusion of proprietary trade secrets or other confidential information.

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.

The 60-day *Federal Register* Notice (FRN) announcement publication date was on December 6, 2023, Vol. 88, No. 233 (pages 84775, 84776, 84777). No public comments were received in response to the publication of that FRN.

The 30-day FRN announcement publication date was on May 30, 2024, Vol. 89, No. 105 (pages 46855-46856). The Census Bureau received comments from four individuals during the public comment period. Two included opinions or observations regarding census data and were deemed out-of-scope.

The third suggested communication improvements between the state and individual school districts. The Census Bureau instructs mapping coordinators that it is their responsibility to initiate and maintain contact throughout the program with local school district officials. This instruction is in the Introduction section of the Annotation Phase respondent guide.

The fourth contained four sub-comments. The first two sub-comments involved the burden hours associated with the newly added feedback component. The burden associated with the feedback component is one hour per state. This equates to a total of 52 hours for the entire feedback component, not 52 hours per state.

The third sub-comment questioned the use of "SDLEA" for the field name in the inventory files instead of "NCESID". The SDLEA code and the NCESID, also known as the NCES District ID, LEA_ID, and NCES ID Number in the NCES data, are not the same so the field name cannot change in the inventory files. In an effort to clarify the relationship between the two, the Census Bureau will add a note to appendix B of the Annotation Phase respondent guide. The Census Bureau will consider options for modifying or adding information to the inventory files in the future.

The final sub-comment suggested a reset of Topologically Integrated Geographic Encoding and Referencing (TIGER) lines and topology in the Geographic Update Partnership Software (GUPS) to minimize respondents' reporting burden. The Census Bureau will take this suggestion into consideration with future GUPS development; however, TIGER is a complex, integrated system in which lines can often represent boundaries of multiple legal, statistical, and administrative geographies. Therefore, lines cannot always be removed from TIGER and topology cannot be reset.

The Census Bureau maintains regular communication with representatives from the NCES about the management and administration of the SDRP. The NCES is responsible for the initial invitation to states requesting participation in the SDRP and serves as the program sponsor. The Census Bureau and the NCES participate in a yearly meeting to plan the invitation request. This meeting also serves as an open forum to discuss questions about the program and consult on any program needs. The following individual has been the primary contact that the SDRP communicates with during these annual meetings.

Douglas Geverdt
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.geverdt@ed.gov>

Since the SDRP relies on external participation from state and local officials, the Census Bureau can collect feedback about the clarity of the instructions, materials, and data provided for use in the program. The Census Bureau schedules a webinar in the fall of each year for the SDRP participants to attend and describes in detail the purpose of the SDRP and how to respond. Participants are given an opportunity during the webinar to ask questions and provide feedback.

During the SDRP reporting period, it is common for state and local officials to call or email the Census Bureau with questions about their submission or reporting requirements. The Census Bureau also contacts program liaisons at state and local governments to clarify questions that might arise during the processing of their submission(s). These opportunities allow the Census Bureau to further learn how participants are responding to the program and identify areas that need clarification that can improve response to the SDRP and reduce participant burden. The mapping coordinators provided below are a sample of the contacts that have provided valuable feedback during the last several SDRP cycles.

Mike Dolbow
Minnesota Department of Education
Phone: 651-582-8789
Email: <mike.dolbow@state.mn.us>

Joe Cowan
Pennsylvania Department of Education
Phone: 717-214-8214
Email: <c-icowan@pa.gov>

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 the SDRP.

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.

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)	Estimated Burden Hours/ Response (d)	Total Annual Burden Hours (e) = (c) x (d)
Annotation Phase	52	1	52	30 hours	1,560 hours
Verification Phase	52	1	52	10 hours	520 hours
Feedback	52	1	52	1 hour	52 hours
Totals			156		2,132 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 (Annotation Phase)	52	1	1,560	\$37.05	\$57,798

Mapping Coordinator (Verification Phase)	52	1	520	\$37.05	\$19,266
Mapping Coordinator (Feedback)	52	1	52	\$37.05	\$1,927
Total					\$78,991

*Hourly wage rate is derived from the May 2023 National Occupational Employment and Wage Estimates report located at the following website: <www.bls.gov/bls/blswage.htm> by averaging the mean hourly wage for the five common position types that normally respond to Census Bureau geographic programs, e.g., Geographers (\$44.45), Cartographers/Photogrammetrists (\$37.89), Surveyors (\$35.58), Surveying/Mapping Technician (\$26.00), and Urban/Regional Planner (\$41.32).

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. To provide feedback, the Census Bureau estimates participants will need no more than an hour to prepare their response. The total maximum number of burden hours for the timeframe of the operation is 2,132 hours (i.e., 52 participants x 41 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.

Table 3: Estimated 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				
Legal and Administrative Area Boundaries Branch				
Branch Chief	14/05	13	\$10,600	\$15,600
Team Lead (1)	13/05	221	\$152,800	\$224,600
Staff (5)	12/05	1,066	\$622,600	\$915,200
Government Engagement Branch				
Team Lead (2)	13/05	26	\$18,000	\$26,400
Staff (5)	12/05	65	\$37,800	\$55,600
Enterprise Geospatial Services				

Staff	Grade/Step	Total Days Effort (One Fiscal Year)	Flat Annual Cost	Total Annualized Cost to Gov't
Branch				
Team Lead (1)	13/05	3	\$2,100	\$3,100
Staff (6)	12/05	80	\$46,500	\$68,400
Planning, Reporting, and Compliance Branch				
Staff (2)	12/05	39	\$22,700	\$33,400
Decennial Information Technology Division				
Programming Staff	14/05, 13/05, and 12/05			\$30,000
Contractor Expenses				
Professional GIS Services			\$391,000	\$484,400
Total Annual Cost to the Government			\$1,304,100	\$1,856,700

The estimate to conduct the SDRP geography data collection is approximately \$1,856,700 annually (i.e., for each clearance year).

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

Since the last OMB approval, there have been three changes introduced—one by the NCES and two by the Census Bureau. 1) With the NCES' planned inclusion of Puerto Rico within the next three years, the universe of potential participants increased by one from 51 to 52. This added a total of 40 hours to the estimated respondent burden hours for the two phases of SDRP. 2) By adding a feedback component, the estimated respondent burden hours were increased by 52 hours, one hour for each potential participant. This increased the overall burden hours from 2,040 hours to 2,132, or 92 hours. 3) By updating the hourly wage rate and applying it to the updated burden hours, the estimated annual respondent costs increased from \$67,320 to \$78,991, an increase of \$11,671. These three changes are detailed in Table 1 and Table 2.

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.

Information collected during the SDRP is published both internally and externally to fulfill program requirements. The priority of the SDRP is to collect school district updates to support the allocation and distribution of a state's federal funding under Title I of the Elementary and Secondary Education Act as amended by the Every Student Succeeds Act of 2015, Public Law 114-95. Information gathered during the SDRP is used within the Census Bureau to produce single year estimates of school-age children ages 5 through 17 in families in poverty. These single year

estimates are shared externally with the NCES to calculate and distribute Title I funds to eligible school districts nationwide.

Since the SDRP relies on external engagement from participating states, updates submitted to the SDRP are published in the American Community Survey (ACS) Partnership files created by the Census Bureau. The Census Bureau makes these files available to the public and become the primary source used by states and local governments for reviewing their school district boundaries and guiding their response to the SDRP.

Below is the annual SDRP schedule.

Table 4: SDRP Schedule

Date	Activity
Early summer	The NCES emails invitation to participate in SDRP. The Census Bureau receives responses nominating mapping coordinators for each state.
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.
April	SDRP Verification Phase materials are posted to the SDRP website and mapping coordinators are notified of the start of the verification phase.
April/May	Deadline for submitting school district changes during verification phase.
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 all collection instruments.

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 (Attached for reference only. This is created and distributed by NCES.)

Census Welcome Letter.

SDRP Quick Start Guide.

SDRP Respondent Guide: Annotation Phase.

Submission Log file (.xlsx).

SDRP Respondent Guide: Verification Phase.