

**Supporting Statement for
Office of Management and Budget Approval of
Local Update of Census Addresses (LUCA) Program**

Part A – Justification

Question 1. Necessity of the Information Collection

The U.S. Census Bureau requests OMB approval of the Local Update of Census Addresses (LUCA) Program. The information to be collected in the LUCA Program is essential to the mission of the Census Bureau and will directly contribute to the successful outcome of Census 2010. The Census Bureau requests **expedited** OMB review/approval of this request. The determination that the 2010 LUCA Program would require approval under the Paperwork Reduction Act was made on May 11, 2007, just nine weeks prior to the scheduled mailout of approximately 90,000 LUCA invitation packages on July 17. An expedited review should allow the Census Bureau to mail the invitations as soon as two weeks after the widely-publicized scheduled date rather than incur a significant delay of 60 or more days if a normal clearance process were followed. Such a delay would be harmful to the 2010 LUCA Program because it reduces the time during which participants can perform their activities. Additionally, perceptions about the LUCA Program on the part of participants and other stakeholders already aware of the planned schedule and anticipating its start could be adversely affected. This could in turn shake confidence in the strength of the census plan as a whole. We seek OMB action on our request by July 15, 2007.

The LUCA Program was developed by the U.S. Census Bureau to meet the requirements of the *Census Address List Improvement Act of 1994, P.L. 103-430*. Under the voluntary LUCA Program, participating governments may review the Census Bureau's confidential list of individual living quarters addresses and provide to the Census Bureau address additions, corrections, deletions, and/or the identification of corrected address counts for census blocks; street and street attribute updates; and legal boundary updates. Governments electing to participate in the LUCA program also provide program contact information; certification of their agreement to maintain the confidentiality of the Census Bureau address information; responses regarding their physical and information technology security capabilities; program option and product media preference information; shipment inventory information; certification of their return/destruction of materials containing confidential data; and, for participants not submitting address list changes, their reasons for not doing so. The program will be available to tribal, state, and local governments, and the District of Columbia and Puerto Rico (or their designated representatives) in areas for which the Census Bureau performs a precensus address canvassing operation (excluded are sparsely settled areas in the states of Alaska and Maine). The LUCA program includes federally recognized American Indian tribes with reservations and/or off-reservation trust lands, states, and general-purpose local governments, such as cities and townships, for which the Census Bureau reports data. This information collection will occur between August 2007 and April 2008. Title 13 of the United States Code, Section 16 authorizes this information collection.

Question 2. Needs and Uses

The Census Bureau will use the LUCA program to help develop the housing unit and group quarters (e.g., college dormitory, nursing home, correctional facility, etc.) address information that it will need to conduct the 2010 Decennial Census. Because tribal, state, and local governments have current knowledge of and data about where housing growth and change are occurring in their jurisdictions, their input into the overall development of the address list for the census makes a vital contribution.

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.

Question 3. Use of Information Technology

The information on address additions, corrections, deletions, and/or the identification of corrected address counts for census blocks is collected, at the participating government's option, in the form of:

Handwritten annotations to printed address listings (for governments with 6,000 or fewer addresses); or

Electronic data files formatted to Census Bureau specifications; or

Electronic data files output by the MAF/TIGER Partnership Software, a desktop computer application supplied free-of-charge to LUCA Program participants that permits the review and update of Census Bureau address and map information

The information on street and street attribute updates as well as legal boundary updates is collected, at the participating government's option, in the form of:

Handwritten annotations on Census Bureau-supplied paper maps; or

Electronic updates to Census Bureau-supplied digital shape files; or

Shape files output by the MAF/TIGER Partnership Software, a desktop computer application supplied free-of-charge to LUCA Program participants that permits the review and update of Census Bureau address and map information

The information on the program contacts, certification of agreement to maintain the confidentiality of the Census Bureau address information, physical and information technology security capabilities, program option and product media preferences, shipment inventory,

certification of the return/destruction of materials containing confidential data, and reasons for not submitting address corrections is collected via the completion of printed paper forms.

Question 4. Efforts to Identify Duplication

Current and complete information about living quarters addresses as is collected in the LUCA Program can only be obtained from state, local, and tribal officials. While the Census Bureau does use the United States Postal Service's Delivery Sequence File as an address update source, its coverage and currency are not nationally consistent, nor does it always include addresses at the housing unit level within multiunit buildings.

Question 5. Minimizing Burden

The Census Bureau has devised several measures to minimize the response burden for governments participating in the LUCA Program.

- For governments with their own list of city style addresses to which they can apply census block codes, the Census Bureau offers an option for them to submit that list to the Census Bureau for matching and updating; this allows those governments to avoid those steps.
- The Census Bureau will supply participants with the MAF/TIGER Partnership Software, which simplifies the task of reviewing the LUCA map and address materials, allows for easy visual comparison of the government's own address information to the Census Bureau's data, and eliminates paper address list and map annotation and transcription.
- The Census Bureau will supply its spatial data to participants in digital shape file format, which will simplify the LUCA review for GIS-enabled governments.
- The Census Bureau will supply computer-based versions of the LUCA training materials, thereby allowing participants to more efficiently train staff that cannot attend classroom training.
- The Census Bureau will allow participants registering for the LUCA Program before October 31, 2007 to provide their 2008 Boundary and Annexation Survey (BAS) response as part of their LUCA submission, thereby avoiding their inclusion in the 2008 BAS.

Question 6. Consequences of Less Frequent Collection

This is a one-time collection.

Question 7: Special Circumstances

The information collection will be conducted in a manner consistent with the Office of Management and Budget (OMB) guidelines.

Question 8. Consultations Outside the Agency

In designing the 2010 LUCA Program, the Census Bureau relied heavily on the results of various outside evaluations of and reports about the Census 2000 LUCA Program, including those performed by the National Academy of Sciences (NAS), the Department of Commerce Office of Inspector General, the Office of Management and Budget, and the Anteon Corporation. We also have reviewed our plans with the members and staff of various organizations that represent potential participating governments including the National Association of Counties (contacts: Jacqueline Byers, 202-942-4285, jbyers@naco.org; Pedro Flores, 202-942-4247, pflores@naco.org), the U.S. Conference of Mayors (contact: Larry Jones, 202-293-7330, ljones@usmayors.org) the National Association of Regional Councils, the American Planning Association, the National Conference of State Legislatures (contact: Tim Storey, 303-856-1537), the Intertribal GIS Council, and the National States Geographic Information Council (contact: Stuart R. Davis, 614-644-3923. stu.davis@ohio.org). We also have consulted with the Census Bureau's various advisory committees and Census Information Center, State Data Center (contact: Xan Wedel, 785-864-9111, xan@ku.edu) and Federal/State Cooperative Program for Population Estimates (contact: Linda Gage, 916-322-4651, linda.gage@dof.ca.gov) partners. We have tested both the MAF/TIGER Partnership Software (contact: John Massey, 910-997-5546, john@gorockingham.com) and the 2010 LUCA Program computer based training (contacts: Joseph Valencia, 301-952-3662, joseph.valencia@mncppc.org), Philip Taylor, 301-952-2026, philip.taylor@mncppc.org) with local/regional government volunteers. We consulted with state officials in Louisiana (contacts: Bill Blair, 225-342-2591, blairb@legis.state.la.us; Glen Koeppe, 225-342-5997, koeppg@legis.state.la.us); Karen Paterson, 225-219-5987, karen.paterson@la.gov) and Mississippi (contact: Cliff Holley, 662-915-7736, saholley@olemiss.edu) about how to approach the LUCA Program for governments in hurricane damaged areas. The Government Accountability Office has carried out an analysis of the planning and implementation of the 2010 LUCA Program.

A *Federal Register* Notice (0607-0795) announcing our intention to request approval of the LUCA Program was published May 30, 2007 on page 29959.

We have prepared and will soon release a *Federal Register* Notice that fully describes the 2010 LUCA Program design for public comment.

Question 9. Paying Respondents

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

Question 10. Assurance of Confidentiality

The Census Bureau's address information, as well as latitude/longitude structure points, is confidential under Title 13 U.S.C. The Census Bureau requires LUCA program participants to

protect the confidentiality of those data, and sets forth guidelines and procedures for their physical and information technology protection.

Question 11. Justification for Sensitive Questions

There are no questions of a sensitive nature.

Question 12. Estimate of Hour Burden

The estimate below relies on:

- *Assessment of the 2000 Census LUCA Program*, National Research Council of the National Academies, September 2001 for data on workdays spent on the LUCA program for governments of various populations sizes;
- *Evaluation of the Local Update of Census Addresses 98 (LUCA 98)*, U.S. Census Bureau, Owens, April, 2003 and *Evaluation of the Local Update of Census Addresses 99 Operation*, U.S. Census Bureau, Owens, May, 2002 for data about participation/update submission rates and for governments of various sizes in the Census 2000 LUCA Program;
- Census Bureau data about the number of functioning governmental units in the size categories below;
- An assumption that 40 percent of governments with populations of 9,999 and below will elect to provide responses in the 2010 LUCA Program, as will 60 percent of governments with populations between 10,000 and 49,999 and 70 percent of governments with populations over 50,000; and
- An assumption of a 7-hour work day

Government Population Size	Estimated Burden Hours
<10,000	2,121,616
10,000 – 49,999	1,178,947
50,000 and above	609,266
Total	3,909,829

Number of Governments assumed to be supplying responses: 19,780

Question 13. Estimate of Cost Burden

We do 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 government records and no special hardware or accounting software or system is necessary to provide answers to this information collection. Therefore, respondents are not expected to 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 Census Bureau estimates its cost for the 2010 LUCA Program as follows for fiscal years 2007 through 2010:

2007	\$11.6 million
2008	\$10.5 million
2009	\$ 6.4 million
2010	\$ 3.9 million

These amounts include costs for the Census Bureau’s National Processing Center (NPC), Regional Offices/Regional Census Centers, and Headquarters. Included are all printing, material, shipping, travel, and person-hour costs. Excluded are costs associated with the LUCA appeals process, which is not covered by this request.

Question 15. Reason for Change in Burden

The LUCA Program is being submitted as a reinstatement, with change.

Question 16. Project Schedule

Mailout of LUCA Program invitations	August, 2007
Review of LUCA materials by participants, submission of updates	September 2007 to April 4, 2008
Validation of LUCA changes by Census Bureau in Address Canvassing Operation	February 2009 to June 2009
Feedback to LUCA participants	August 2009 to October 2009

Question 17. Request to Not Display Expiration Date

We wish not to display the expiration date on the LUCA information collection forms.

Question 18. Exceptions to the Certification

There are no exceptions.

Part B – Collection of Information Employing Statistical Methods

The LUCA Program does not make use of statistical methodologies, nor does it include censuses or surveys.

Attachments

Forms

- D-1668 - Registration Form - English
- D-1669 - Confidentiality Agreement Form - English
- D-1670 - Participation Option/Product Preference Form
- D-1670(LTW) - Product Preference Form - Mailed to entities wholly within a federally-recognized American Indian reservation and/or trust land
- D-1670(SG) - Participation Option/GIS Preference/County Selection Form - mailed to
governors only (state level form)
- D-1671 - Inventory Form - English
- D-1674 - Return/Destruction Form - English
- D-1676- Self-Assessment Checklist - English
- D-1690(LG) - Address List - local government
- D-1690(TG) - Address List - tribal government
- D-1690(PR)(S) - Address List - Puerto Rico (Spanish)
- D-1691(LG) - Address List Add Page - local government
- D-1691(TG) - Address List Add Page - tribal government
- D-1691(PR)(S) - Address List Add Page - Puerto Rico (Spanish)
- D-1692(LG) - Address Count List - local government
- D-1692(TG) - Address Count List - tribal government
- D-1662(PR) – Address Count List – Puerto Rico

Letters

- D-1685(LG) – Invitation letter to local highest elected official (HEO)
- D-1685(LTP) – Invitation letter to local HEO partially within a reservation
- D-1685(LTW) – Invitation letter to local HEO wholly within a reservation
- D-1685(TG) – Invitation letter to Tribal HEO
- D-685(SG) – Invitation letter to state Governor
- D-1685(SGPW) – Invitation letter to the Governor of states partially/wholly within a reservation
- D-1686(LG) – Invitation courtesy copy – local governments
- D-1686(LTP) – Invitation courtesy letter to local HEO partially within a reservation
- D-1686(LTW) – Invitation courtesy letter to local HEO wholly within a reservation
- D-1686(TG) – Invitation courtesy copy – Tribal governments
- D-1686(SG) – Invitation courtesy copy to state contacts
- D-1686(SGPW) – Invitation courtesy copy to state contacts partially/wholly within a reservation
- D-1700 – Invitation announcement to Regional Planning Agencies

D-1673 – Closeout letter to participants that did not return any materials

User Guides

Option 1 – Full Address List Review Paper Format User Guide

Option 1 – Full Address List Review Computer-Readable Format User Guide

Option 2 – Title 13 Local Address List Submission

Option 3 – Non-Title 13 Local Address List Submission

User Guide for the MAF/TIGER Partnership Software (MTPS)

D-1675 – Confidentiality and Security Guidelines

Other

Draft LUCA map

Forms not yet available (content the same as corresponding English language form):

D-1668(PR)(S) - Registration Form - Spanish

D-1669(PR)(S) - Confidentiality Agreement Form - Spanish

D-1670(PR)(S) - Participation Option/Product Preference Form – Spanish

D-1671(PR)(S) - Inventory Form – Spanish

D-1674(PR)(S) - Return/Destruction Form - Spanish

D-1676(PR)(S) - Self-Assessment Checklist – Spanish

D-1670(SG)(PR)(S) - Participation Option/GIS Preference/County Selection Form –
mailed to governor only (Puerto Rico form, Spanish)