

**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 an extension of the expiration date for 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 requested and received emergency clearance from OMB so that the LUCA Program start-up was not delayed. That emergency clearance expires February, 2008.

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 May 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](mailto:jbyers@naco.org); Pedro Flores, 202-942-4247, [pflores@naco.org](mailto:pflores@naco.org)), the U.S. Conference of Mayors (contact: Larry Jones, 202-293-7330, [ljones@usmayors.org](mailto: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](mailto: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](mailto:joseph.valencia@mncppc.org)), Philip Taylor, 301-952-2026, [philip.taylor@mncppc.org](mailto: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 Koepp, 225-342-5997, [koeppg@legis.state.la.us](mailto:koeppg@legis.state.la.us)); Karen Paterson, 225-219-5987, [karen.paterson@la.gov](mailto:karen.paterson@la.gov)) and Mississippi (contact: Cliff Holley, 662-915-7736, [saholley@olemiss.edu](mailto: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 (2010 Census: Census Bureau Has Improved the Local Update of Census Addresses Program, But Challenges Remain, GAO-07-736, June 14, 2007).

A *Federal Register* Notice announcing our intention to request approval of the LUCA Program was published May 30, 2007 on page 29959. Two comments were received. One comment dealt with the MAF/TIGER Accuracy Improvement Program and its relationship to the LUCA Program. The other expressed support for the LUCA Program plan but expressed concern over how the program would be conducted in hurricane-affected areas. The comments also included a suggestion for tracking the return of confidential materials, some observations about the LUCA Program as implemented for the 2008 Dress Rehearsal, and a suggestion about testing the MAF/TIGER Partnership Software. These comments and suggestions have all been considered, and some have been implemented, although none resulted in a change in the LUCA Program procedures.

A *Federal Register* Notice that fully describes the final 2010 LUCA Program was published on March 7, 2008 (Volume 73, No. 46, Friday, March 7, 2008, p. 12369, Final Procedures for Participation in the 2010 Decennial Census Local Update of Census Addresses Program).

### **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 associated with residential addresses, are 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**

We do not plan any change in respondent burden.

**Question 16. Project Schedule**

Mailout of LUCA Program invitations	August, 2007
Review of LUCA materials by participants, submission of updates	November 2007 to May 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 cannot display the expiration date on the LUCA information collection forms, as they have already been distributed.

**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**

**2010 Decennial Census LUCA User Guides** – all user guides provide instructions and examples for reviewing and updating LUCA program materials. User guides are specific to the participation option and address list/map format chosen.

1. Option 1, paper, Local government
2. Option 1, paper, Puerto Rico local government (Spanish)
3. Option 1, paper, Tribal government
4. Option 1, computer-readable, Local government
5. Option 1, MTPS, Local government
6. Option 1, MTPS, Puerto Rico, local government (English)
7. Option 1, MTPS, Tribal government
8. Option 1, computer-readable, Puerto Rico (Spanish)
9. Option 1, State government
10. Option 1, computer-readable, Tribal government
11. Option 2, computer-readable, Local government
12. Option 2, MTPS, Local government
13. Option 2, MTPS, Tribal government
14. Option 2, computer-readable, State government
15. Option 2, computer-readable, Tribal government
16. Option 3, computer-readable, Local government
17. Option 3, MTPS, Local government
18. Option 3, MTPS, Tribal government
19. Option 3, computer-readable, State government
20. Option 3, computer-readable, Tribal government
21. Option 1, computer-readable, Puerto Rico government (Spanish)
22. Option 1, MTPS, State government
23. Option 2, MTPS, State government
24. Option 3, MTPS, State government

## **Workshops:**

### **Promotional Workshop**

25. LUCA Promotional Workshop Participant Guide
26. LUCA Promotional Workshop Participant Guide, Puerto Rico (Spanish)

### **Training Workshop**

27. LUCA Training Workshop Participant Guide
28. LUCA Training Workshop Participant Guide, Puerto Rico (Spanish)

## **Computer-Based Training:**

29. LUCA CBT
30. MAF/TIGER Partnership Software (MTPS)

## **Forms**

31. Disclosure Notice
32. D1667 – Contact Information Update Form
33. D1669 – Confidentiality Agreement
34. D1668 – Registration Form
35. D1670 – Participation Option/Product Preference
36. D1670(LTW) – Product Preference, Option 3 – Non-Title 13 Address List Submission
37. D1670(SG) – Participation Option/GIS Preference/County Selection Form for State Governments
38. D1671 – Inventory Form for the Return/Submission of LUCA Program Materials
39. D1676 – Self-Assessment Checklist for the Confidentiality and Security Guidelines
40. D1674 – Return or Destruction of Title 13, U.S.C. Materials
41. D1710 – Insert for the LUCA Computer-based Training (CBT) CD
42. Confidentiality and Security Guidelines

## **Forms – Puerto Rico**

43. 2010 Confidentiality and Security Guidelines
44. D-1667(PR) – Contact Information Update Form
45. D-1668(PR) – Registration Form
46. D-1669(PR) – Confidentiality Agreement Form
47. D-1670LG(PR) – Participation Option Form for local governments
48. D-1670SG(PR) – Participation Option Form state government
49. D-1671(PR) – Inventory Form



50. D-1674(PR) – Return or Destruction of Title 13 Materials
51. D-1676(PR) – Self-Assessment Checklist

### **Local Government Address Lists**

52. D1690(LG) – Local Address List – paper list of all residential addresses known to the Census Bureau. Used by Option 1 participants to update and correct addresses. (Also available to Option 1 participants in computer-readable format and in computer-readable format only to Option 2 participants as a reference.)
53. D1691 – Address List Add Page – blank paper form provided to Option 1 participants choosing paper address list format to add city-style addresses.
54. D1692 – Address Count List – identifies the number of housing unit and group quarters addresses on the Census Bureau’s address list for each census block within a jurisdiction. Used by Option 1 participants to record housing unit and/or group quarters address counts within a census block where address count discrepancies exist. (Also available to Option 1 participants in computer-readable form and in computer-readable format only to Option 2 and Option 3 participants as a reference.)

### **Tribal Government Address Lists**

55. D1690(TG) – Tribal Address List – paper list of all residential addresses known to the Census Bureau. Used by Option 1 tribal participants to update and correct addresses. (Also available to Option 1 participants in computer-readable format and in computer-readable format only to Option 2 participants as a reference.)

### **Puerto Rico Government Lists**

56. D1690 (PR) – Local Address List for Puerto Rico – paper list of all residential addresses known to the Census Bureau. (Also available in computer-readable format.)
57. D1691(PR) – Address List Add Page (Spanish) – blank paper form for participants choosing paper address list format to add city-style addresses
58. D1692(PR) – Address Count List (Spanish) – identifies the number of housing unit and group quarters addresses on the Census Bureau’s address list for each census block within a jurisdiction. Used by participants to record housing unit and/or group quarters address counts within a census block where address count discrepancies exist. (Also available to participants in computer-readable form.)

### **Letters**

59. D-1663 (LGPR) – Advance Notice Letter to the HEOs of local governments in Puerto Rico.
60. D-1663(LG) – Advance Notice Letter to the HEOs of local governments-stateside
61. D-1663(LG LTP) – Advance Notice Letter to the HEOs of local governments partially located on federally-recognized American Indian reservations and/or trust lands.
62. D-1663(LG LTW) – Advance Notice Letter to the HEOs of local governments wholly located on federally-recognized American Indian reservations and/or trust lands.
63. D-1663(TG) – Advance Notice Letter to the HEOs of tribal governments.

64. D-1663(SG PR) – Advance Notice Letter to the governor of Puerto Rico.
65. D-1663(SG) – Advance Notice Letter to the governors without area on federally-recognized American Indian reservations and/or trust lands.
66. D-1663(SG LTPW) – Advance Notice Letter to the governors with area on federally-recognized American Indian reservations and/or trust lands.
67. D-1664(LG PR) – Advance Notice Courtesy Letter to local government contacts in Puerto Rico.
68. D-1664(LG) – Advance Notice Courtesy Letter to local government contacts – stateside.
69. D-1664(LG LTP) – Advance Notice Courtesy Letter to local government contacts in entities partially located on federally-recognized American Indian reservations and/or trust lands.
70. D-1664(LG LTW) – Advance Notice Courtesy Letter to local government contacts in entities wholly located on federally-recognized American Indian reservations and/or trust lands.
71. D-1664(TG) – Advance Notice Courtesy Letter to tribal government contacts.
72. D-1664(SG PR) – Advance Notice Courtesy Letter to state government contacts in Puerto Rico.
73. D-1664(SG) – Advance Notice Courtesy Letter to state government contacts without area on federally-recognized American Indian reservations and/or trust lands.
74. D-1664(SG LTPW) – Advance Notice Courtesy Letter to state government contacts with area on federally-recognized American Indian reservations and/or trust lands.
75. D-1666 – Advance Notice Informational Letter to Regional Planning Agencies.
76. D-1685(LG PR) – Invitation Letter to the HEOs of local governments in Puerto Rico.
77. D-1685(LG) – Invitation Letter to HEOs of local governments – stateside.
78. D-1685(LG LTP) – Invitation Letter to the HEOs of local governments partially located on federally-recognized American Indian reservations and/or trust lands.
79. D-1685 (LG LTW) - Invitation Letter to the HEOs of local governments wholly located on federally-recognized American Indian reservations and/or trust lands.
80. D-1685(TG) – Invitation Letter to the HEOs of tribal governments.
81. D-1685(SG PR) – Invitation Letter to the governor of Puerto Rico.
82. D-1685(SG) – Invitation Letter to the governors without area on federally-recognized American Indian reservations and/or trust lands.
83. D-1685(SG SGPW) – Invitation Letter to the governors with area on federally-recognized American Indian reservations and/or trust lands.
84. D-1685(LG AK ME OUT) – Informational Letter to the HEOs of local governments in Alaska explaining that they cannot participate in LUCA as their entity is identified for Special Enumeration.

85. D-1685(LG AK P) – Invitation Letter to local governments in Alaska with Special Enumeration area.
86. D-1685(LG ME P) – Invitation Letter to local governments in Maine with Special Enumeration area.
87. D-1685(LT-R) – Re-Invitation Letter to HEOs of local governments with area on federally-recognized American Indian reservations and/or trust lands.
88. D-1685(SG-R) – Re-Invitation Letter to governors of states with area on federally-recognized American Indian reservations and/or trust lands.
89. D-1685(TG-R) – Informational letter to HEOs of tribal governments explaining the decision to allow the local and state governments to review the Census Address List if their government has area on federally-recognized American Indian reservations and/or trust lands.
90. D-1685(SG AK) – Invitation Letter to the governor of Alaska.
91. D-1685(SG ME) – Invitation Letter to the governor of Maine.
92. D-1686 (LG PR) – Invitation Courtesy Letter to local government contacts in Puerto Rico.
93. D-1686(LG) – Invitation Courtesy Letter to local government contacts – stateside.
94. D-1686(LG LTP) – Invitation Courtesy Letter to local government contacts in entities partially located on federally-recognized American Indian reservations and/or trust lands.
95. D-1686(LG LTW) – Invitation Courtesy Letter to local government contacts in entities wholly located on federally-recognized American Indian reservations and/or trust lands.
96. D-1686(TG) – Invitation Courtesy Letter to tribal government contacts.
97. D-1686(SG PR) – Invitation Courtesy Letter to state government contacts in Puerto Rico.
98. D-1686(SG) – Invitation Courtesy Letter to state government contacts without area on federally-recognized American Indian reservations and/or trust lands.
99. D-1686(SG SGPW) – Invitation Courtesy Letter to state government contacts with area on federally-recognized American Indian reservations and/or trust lands.
100. D-1686(LG AK ME OUT) – Informational Letter to the contacts of local governments in Alaska explaining that they cannot participate in LUCA as their entity is identified for Special Enumeration.
101. D-1686(LG AK P) – Invitation Courtesy Letter to local governments in Alaska with Special Enumerate area.
102. D-1686(LG ME P) – Invitation Courtesy Invitation Letter to local governments in Maine with Special Enumerate area.
103. D-1686(LT-R) – Re-Invitation Courtesy Letter to local government contacts with area on federally-recognized American Indian reservations and/or trust lands.

104. D-1686(SG-R) – Re-Invitation Courtesy Letter to contacts in states with area on federally-recognized American Indian reservations and/or trust lands.
105. D-1686(TG-R) – Informational letter to contacts of tribal governments explaining the decision to allow the local and state governments to review the Census Address List if their government has area on federally-recognized American Indian reservations and/or trust lands.
106. D-1686(SG AK) – Invitation Courtesy Letter to the state contacts in Alaska.
107. D-1686(SG ME) – Invitation Courtesy Letter to the state contacts in Maine.
108. D-1700 – LUCA Informational Letter to Regional Planning Agencies
109. LUCA PC1 – Reminder Postcard to tribal, state, and local governments
110. LUCA PC1(PR) – Reminder Postcard to state and local governments in Puerto Rico.
111. D-1706 – Password Letter – this letter is mailed to participants that selected the computer-readable address list. It contains the password necessary to open the address list file.
112. D-1706(PR) – Password Letter sent to participants in Puerto Rico that selected the computer-readable address list. It contains the password necessary to open the address list file.

### **Promotional Materials**

113. D-1693L – LUCA Booklet for local governments
114. D-1693T – LUCA Booklet for tribal governments
115. D-1693S – LUCA Booklet for state governments
116. D-1693L(PR) – LUCA Booklet for local governments in Puerto Rico
117. D-1693S(PR) – LUCA Booklet for the state government – Puerto Rico
118. D-1701 – LUCA flyer

### **Maps**

119. Sample LUCA map