SUPPORTING STATEMENT

U.S. Department of Commerce

U.S. Census Bureau

Geographic Partnership Programs Generic Clearance

OMB Control No. 0607-0795

Part A. Justification

Question 1. Necessity of the Information Collection

The U.S. Census Bureau requests approval from the Office of Management and Budget (OMB) for a three

year extension of the generic clearance called the Geographic Partnership Programs (GPPs) that will cover

a number of activities needed to update the Master Address File/ Topologically Integrated Geographic

Encoding and Referencing (MAF/TIGER) database (MTdb) with associated address and geographic

information. The information to be collected in these programs in cooperation with tribal, state, and local

governments and other partners, are essential to the mission of the Census Bureau and directly contributes

to the successful outcome of censuses and surveys conducted by the Census Bureau. The generic

clearance will allow the Census Bureau to focus its limited resources on actual operational planning,

development of procedures, and implementation of programs to update and improve the geographic

information maintained in the MTdb.

We will follow the protocol of past generic clearances: We will submit clearance requests at least two

weeks before the planned start of each activity that give more exact details, examples of forms, and final

estimates of respondent burden. We also will file a year-end summary with OMB after the close of each

fiscal year giving results of each activity conducted.

The following sections describe the categories of activities to be included under the clearance.

Local Update of Census Addresses (LUCA) – LUCA Appeals

The LUCA Program was developed by the Census Bureau to meet the requirements of the *Census Address List Improvement Act of 1994*, *P.L. 103-430*. The Census Bureau uses the LUCA program to help develop the housing unit¹ address information that it needs to conduct the 2010 Census. Under the voluntary LUCA Program, participating governments reviewed the Census Bureau's confidential list of individual living quarters addresses and provided 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. The program was 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). Title 13 of the United States Code, Section 16 authorizes this information collection. The final LUCA procedures were published as: Final Procedures for Participation in the 2010 Decennial Census Local Update of Census Addresses Program in *Federal Register* / Vol. 73, No. 46, Pages 12369-12373 / Friday, March 7, 2008 / Notices.

When the LUCA participants completed their initial review, they returned their updates to the Census Bureau. The Census Bureau has included those updates in its nationwide Address Canvassing operation, being conducted from April 2009 to July 2009. The determinations of the Address Canvassing operation

¹ The term housing unit is defined as a house, an apartment, a mobile home or trailer, a group of rooms or a single room occupied as a separate living quarters or, if vacant, intended for occupancy as a separate living quarters. Separate living quarters are those in which one or more occupants live separately from any other individual(s) in the building and have direct access to the living quarters without going through other living quarters, such as from outside the building or through a common hall. For vacant units, the criteria of separateness and direct access are applied to the intended occupants.

for the address additions and corrections received from the LUCA participants will be identified in feedback materials provided to the participants by the Census Bureau.

The proposed procedures for LUCA Appeals were published for comment as: Procedures for Participation in the Appeals Process for the 2010 Decennial Census Local Update of Census Addresses (LUCA) Program in Federal Register / Vol. 73, No. 60, Pages 14696-14701 / Tuesday, March 31, 2009 / Notices. As proposed, LUCA participating governments that provided address updates/corrections, challenged the count of addresses in at least one census block on the census address list, submitted their own address lists to the Census Bureau, or certified that the census address list as originally provided required no correction are eligible to file an appeal within 30 days of receiving their LUCA feedback materials. Appeals are filed with and decided by the 2010 Decennial Census LUCA Appeals Staff. Participating governments can appeal the Census Bureau's non-acceptance of address updates/corrections, addresses still thought to be missing from originally challenged blocks, and/or the deletion of addresses from the census address list in the Address Canvassing Operation. Participating governments filing appeals must supply contact information for their governmental jurisdiction, address information for each address being appealed, and supporting documentation that substantiates the existence and/or location of each address being appealed. The provision of Feedback materials that reflect the results of Address Canvassing and the Appeals process available to LUCA participants are designed to result in the best possible address list for the 2010 Census.

New Construction

The New Construction Program is designed to ensure that the Census Bureau address list is as complete as possible by Census Day, April 1, 2010. The New Construction program is the final opportunity for local

jurisdictions to submit new city-style housing unit addresses for which basic construction (closing the structure to the elements) will be completed by Census Day.

The 2010 New Construction program is offered only to jurisdictions with city-style addresses to which the Census Bureau will deliver the census questionnaires by mail. City-style addresses are those in a house number and street name format (e.g., 101 Main St.). In areas with primarily noncity-style addresses (e.g., rural route and box number or post office box numbers), the Census Bureau will have enumerators hand deliver questionnaires to all housing units in each block; these areas are not included in the New Construction Program.

Note: Enumeration areas are defined using whole census blocks, thus creating the possibility for pockets of city-style addresses to exist in blocks where questionnaires are delivered by hand and/or for pockets of noncity-style addresses to exist in blocks where questionnaires are delivered by mail. The New Construction Program will only accept city-style addresses for new housing units in census blocks designated for the delivery of questionnaires by mail.

The New Construction program excludes Group Quarters addresses. The Census Bureau has a series of operations designed to capture new Group Quarters addresses, including but not limited to, Group Quarters Validation, Group Quarters Advanced Visit, and Group Quarters Enumeration.

Redistricting Data Program

The Census Bureau will conduct Phase 2 of the Census Redistricting Data Program, the Voting District and Block Boundary Suggestion Project (VTD/BBSP). This voluntary phase collects voting district boundaries, updates to legislative and congressional districts, and block boundary suggestions.

As part of Phase 2, the Census Bureau works with the 52 participants who are official non-partisan liaisons from the 50 States, the District of Columbia, and the Commonwealth of Puerto Rico. The participants use the digital shapefiles provided by the Census Bureau to modify voting district boundaries, codes and names; make corrections to legislative and congressional districts; and suggest visible features for use as 2010 Census tabulation block boundaries. The participants will have the opportunity to verify the inclusion of their voting districts and suggested tabulation block boundary features during 2009 and early 2010 to ensure that the voting district boundaries used by the Census Bureau are consistent with their submissions.

The information from Phase 2 of the Census Redistricting Data Program (VTD/BBSP) is used to prepare products delivered to each state to comply with PL-94-171. Phase 2, VTD/BBSP is established in accordance with the provisions of Title 13 U.S.C. 141(c).

Participant Statistical Areas Program and Tribal Statistical Areas Program (PSAP and TSAP)

The Participant Statistical Areas Program (PSAP) and the Tribal Statistical Areas Program (TSAP) were developed to give the local and tribal governments the opportunity to review and update, if necessary, statistical geographic entities for use in tabulating and publishing data from the 2010 Census, the American Community Survey, and other surveys. Under the voluntary PSAP program, participants are regional agencies and local governments that identify and update boundaries for four statistical geographic entities: county-based census tracts, block groups, census county divisions, and census designated places. Under the voluntary TSAP program participants are tribal governments that identify and update boundaries for American Indian and Alaska Native specific statistical areas for the reporting of Census

Bureau data. The PSAP and TSAP are parallel geographic programs. Tribes are also encouraged to work with the PSAP participants for their area of interest to help ensure that tribal data needs are met through the statistical geographic entities defined through PSAP as well as through TSAP. The program will be available to tribal and local governments for all States, the District of Columbia, and Puerto Rico. The information collection for both PSAP and TSAP will occur from fall 2008 through winter 2009. The Census Bureau Regional Offices will review the information collected in the spring of 2009. Participants will verify the boundaries changes during the summer and fall of 2009.

Traffic Analysis Zones (TAZs) Program

Traffic Analysis Zones (TAZs) are areas developed by transportation planners to serve as the basic spatial unit of analysis for transportation planners to develop plans and to forecast changes in commuting patterns, trip volumes, and modes of travel. TAZs are geographic areas that divide planning regions into relatively similar areas of land use, land activity, and commuter travel and contain socioeconomic data related to land use. Delineating TAZ boundaries through use of census geography enables users to readily access all census demographic data or datasets based on census geography. Under the voluntary TAZ program Metropolitan Planning Organizations (MPOs) and individual State Departments of Transportation (DOTs) delineate TAZs for the purpose of tabulating data on journey-to-work at residence, place of work, and home-to-work flow geographies using American Community Survey (ACS) data. Delineating TAZ boundaries through the Census Bureau voluntary TAZ program enables users to readily access census demographic data based on census geography to inform the delineation process. The program supports the Census Transportation Planning Products (CTPP) and will be available to all State governments, the District of Columbia, and Puerto Rico.

The TAZ information collection will occur during calendar year 2011. Before and during that time participants in other geographic partnership programs will be submitting their tract and block group boundaries to the Census Bureau. The coordination of these schedules enables the Census Bureau to send TAZ materials, which may include preliminary tract and block group boundaries, on a flow basis to MPOs and State DOTs. Tract and block group boundaries for the 2010 Census (and the ACS from 2010 on) are expected to become final in September 2010, along with all other 2010 Census geographic areas.

School District Review Program (SDRP)

The U.S. Census Bureau creates special tabulations of decennial census data by school district geography. These tabulations provide detailed demographic characteristics of the nation's public school systems and offer one of the largest single sources of children's demographic characteristics currently available.

Information is distributed through the National Center for Education Statistics (NCES).

The SDRP, conducted by the U.S. Census Bureau every two years, is of vital importance for each state's allocation under Title I of the Elementary and Secondary Education Act as amended by the No Child Left Behind Act of 2001, Public Law (P.L.) 107-110. The school district information obtained through this program, along with the Census 2000 population and income data, current population estimates, and tabulations of administrative records data, are used in forming the Census Bureau's estimates of the number of children aged 5 through 17 in low-income families for each school district. These estimates of the number of children in low-income families residing within each school district are the basis of the Title 1 allocation for each school district.

The scope of the SDRP is for state officials to review the Census Bureau's current school district information and to provide the Census Bureau with updates and corrections to the school district names and Federal Local Education Agency (LEA) identification numbers, school district boundaries, and the grade ranges for which a school district is financially responsible. This includes updating unified, secondary, and elementary school districts.

The list above is not exhaustive of all activities that may be performed under this generic clearance. We will follow the approved procedure when submitting any additional activities not specifically listed here.

The authority for conducting the activities in this document comes from Title 13 United States Code, Sections 16,141, and 193.

Question 2. Needs and Uses

All activities described above directly support the Census Bureau's efforts to maintain its geographic database (addresses, features, and political and statistical boundaries) in partnership with local agencies nationwide. 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. Similarly, those governments are in the best position to work with geographic boundaries, and benefit themselves when their address list is complete and data tabulation areas are drawn to the highest possible level of accuracy.

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 from an ArcGIS extension or the MAF/TIGER Partnership Software (MTPS), a desktop computer application supplied free-of-charge to program participants that permit the review and update of Census Bureau address and map information.

The information on street and street attribute updates as well as legal and statistical boundary updates and other associated geographic information are 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

Shapefile output from an ArcGIS extension or the MTPS, a desktop computer application supplied free-of-charge to program participants that permit 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 census programs can only be obtained from State, local, and tribal officials. While the Census Bureau uses 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.

The information collected in these programs can be best obtained and updated only from local and tribal officials, State governments, and State Data Centers. These activities do not duplicate information collected by any other agency. Further, there is no similar current information available on a consistent national basis that could be used or modified for these purposes.

Question 5. Minimizing Burden

The Census Bureau has devised several measures to minimize the response burden for governments participating in its geographic programs.

Wherever possible, the Census Bureau offers options in program materials. 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 geographic materials, allows for easy visual comparison of the government's own information to the Census Bureau's data, and eliminates the requirement for paper address lists and map annotation and transcription.
- The Census Bureau will supply its spatial data to participants in digital shape file format, which will simplify geographic review for GIS-enabled governments.

Question 6. Consequences of Less Frequent Collection

Response to each of these activities is on a one-time basis for each decennial census cycle, including census tests and the dress rehearsal. If these activities were not conducted, census data tabulations would be less useful to stakeholders, legal requirements would not be met, and the accuracy of the MTdb would suffer, causing increased costs for, and problems in, conducting the decennial census and other Census Bureau statistical programs.

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

The following sections describe the consultations outside the agency for each program.

LUCA Appeals

The Census Bureau consulted with persons outside the agency to obtain their views. At the first of two 2008 Census Dress Rehearsal LUCA Feedback Materials Roundtable Discussions participants approved the content of the user guides and products for the 2008 Dress Rehearsal, suggested minor changes to other existing materials, and requested a few new materials. The participants said that their priorities were to know what products they were to receive, how to move through the process, and what was expected of them. The Census Bureau explained the LUCA Appeals process to which the participants said that they understood the process, what materials they would receive, and what would be expected to file an appeal.

- 2008 Census Dress Rehearsal LUCA Feedback Materials Roundtable Discussion in Pinehurst,
 North Carolina, conducted August 7, 2008.
- 2008 Census Dress Rehearsal LUCA Feedback Materials Roundtable Discussion in Stockton,
 California, scheduled for September 10, 2008.

Participants from the 2008 Census Dress Rehearsal LUCA Feedback Materials Roundtable Discussion were:

- Clint Williams of Harnett County, North Carolina, phone 910-814-6388
- Zachary Woolard of Moore County, North Carolina, phone 910-947-1078
- James Armstrong of Richmond County, North Carolina, phone 910-417-4907
- Andrea Correll of Pinehurst, North Carolina, phone 910-295-2581 ext 237

Announcements concerning proposed and final criteria for LUCA Appeals have been drafted but are yet to be published in a *Federal Register* Notice.

New Construction

Announcements concerning proposed and final criteria for New Construction have been drafted but are yet to be published in a *Federal Register* Notice.

2010 Census Redistricting Data Program

The Census Bureau discussed the 2010 Census Redistricting Data Program, as well as plans for the 2010 Census, at the Redistricting Data Program meeting hosted by the state liaison in 48 states, the District of Columbia, and Puerto Rico, and at the annual meeting of the National Conference of State Legislatures.

Announcements concerning the 2010 Census Redistricting Data Program were published in the following *Federal Register* Notices:

- Establishment of the 2010 Census Redistricting Data Program in *Federal Register* / Vol. 69, No.
 93, Pages 26547-26548 / Thursday, May 13, 2004 / Notices
- 2010 Census Redistricting Data Program Commencement of Phase 1: State Legislative District
 Project in *Federal Register* / Vol. 70, No. 30, Pages 7713-7714 / Tuesday, February 15, 2005 /
 Notices
- 2010 Census Redistricting Data Program Commencement of Phase 2: The Voting District/Block
 Boundary Suggestion Project in *Federal Register* / Vol. 72, No. 76, Page 19879 / Friday, April 20,
 2007 / Notices

For the notice dated May 13, 2004, the Census Bureau received and responded to two comments regarding the Redistricting Data Program. Both comments were concerned with the effect that the census residence rules have on State legislative redistricting. In response, the Census Bureau explained that, while the Census Bureau works closely with the States to identify new construction; correct political boundaries;

and add nonstandard features for use as block boundaries, the data tabulation programs consistently use the residence rules established for census collection and tabulation purposes.

There were no comments regarding the notices dated February 15, 2005 and April 20, 2007.

Participant Statistical Areas Program (PSAP) and Tribal Statistical Areas Program (TSAP)

The Census Bureau discussed the purpose, methodology, and problems of PSAP and TSAP with county, State, and tribal officials, plus a network of frequent data users. Discrepancies in boundaries were discussed periodically with governmental officials during problem resolution. As the primary stakeholders in the accuracy of boundary information and the resulting data, respondents were cooperative and willing to provide information. During these conversations comments were favorable concerning the program and no issues were unresolved.

The Census Bureau discussed PSAP and TSAP at the following conferences and meetings:

- Council of Professional Associations on Federal Statistics
- Indiana GIS Conference
- Southern Demographic Association
- Association of American Geographers
- Maryland State Data Center Prince George's County Affiliates
- Applied Geography Conference
- Urban and Regional Information Systems Association
- GIS-T
- Redistricting Data Program for 48 states, the District of Columbia, and Puerto Rico

•	American	Indian a	and .	Alaska	Native	Advisory	Committee ((for	TSAP [*])
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•	Numerous	American	Indian	Consultation	Meetings
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The following is a representative sample of individuals consulted:						
Patricia C. Becker						
APB Associates						
28300 Franklin Rd						
Southfield, MI 48034						
Pam Harris						
Bureau Chief						
Census and Economic Information Center						
Montana Department of Commerce						
David Hexem						
City of Riverside						
Information Technology Officer						
3900 Main Street, Basement						
Riverside, CA 92522						

William Gayk, Ph.D.

Deputy Director of Administrative Service

Riverside County Transportation and Land Management Agency 4080 Lemon Street, 14th Floor Riverside, CA 92502 Sharon Mollick, GISP **Assistant Planner** County of Cumberland Planning & Economic Development 800 East Commerce Street Bridgeton, NJ 08302 Monica Jesus Guerrero Planner Bureau of Statistics and Plans Government of Guam P.O. Box 2950 Hagatna, GU 96932 Mark Greninger Chief Administrative Office

Service Integration Branch

County of Los Angeles

222 South Hill Street, 5th Floor

Los Angeles, CA 90012

Announcements concerning proposed and final criteria for PSAP and TSAP were published in the following *Federal Register* Notices:

- Alaska Native Areas (ANAs) for the 2010 Census Proposed Criteria and Guidelines in *Federal Register* / Vol. 73, No. 52, Pages 14203-14214 / Monday, March 17, 2008 / Notices
- American Indian Areas (AIAs) for the 2010 Census Proposed Criteria and Guidelines in *Federal Register* / Vol. 73, No. 63, Pages 17303-17314 / Tuesday, April 1, 2008 / Notices
- Census County Division and Equivalent Entities Program for the 2010 Census Final Criteria in
 Federal Register / Vol. 73, No. 27, Pages 7521-7525 / Friday, February 8, 2008 / Notices
- Census County Division (CCD) and Equivalent Entities Program for the 2010 Census Proposed
 Change and Proposed Criteria in *Federal Register* / Vol. 72, No. 66, Pages 17324-17326 / Friday,
 April 6, 2007 / Notices
- Census Designated Place (CDP) Program for the 2010 Census Final Criteria in *Federal Register* / Vol. 73, No. 30, Pages 8269-8273 / Wednesday, February 13, 2008 / Notices
- Census Designated Place (CDP) Program for the 2010 Census Proposed Criteria in *Federal Register* / Vol. 72, No. 66, Pages 17326-17329 / Friday, April 6, 2007 / Notices
- Census Tract Program for the 2010 Decennial Census Final Criteria in *Federal Register* / Vol.
 73, No. 51, Pages 13836-13844 / Friday, March 14, 2008 / Notices

Census Tract Program for the 2010 Census – Proposed Criteria in *Federal Register* / Vol. 72, No.
 66, Pages 17329-17337 / Friday, April 6, 2007 / Notices

Census Block Group Program for the 2010 Decennial Census – Final Criteria in *Federal Register /* Vol. 73, No. 51, Pages 13829-13836 / Friday, March 14, 2008 / Notices

Census Block Group Program for the 2010 Census – Proposed Criteria in *Federal Register* / Vol.
 72, No. 66, Pages 17337-17343 / Friday, April 6, 2007 / Notices

A summary of comments received in response to proposed criteria for the programs and changes to the proposed criteria as a result of public comments are both summarized in the Final Criteria *Federal Register* Notice for each program.

The following are a sample of individuals who provided comments for the PSAP notices:

Andrew Reamer, Fellow

Metropolitan Policy Program

The Brookings Institution

1775 Massachusetts Ave., NW

Washington, DC 20036

Daniel Blake

Professor of Economics, and Director

San Fernando Valley Economic Research Center

California State University, Northridge 91330-8245

Daniel M. Tarica, M.P.P.

Councilwoman Wendy Greuel

City of Los Angeles

200 N. Spring St., Room 475

Los Angeles, CA 90012

John C. Shepard, AICP

Development Planner

Southwest Regional Development Commission

2401 Broadway Avenue

Slayton, Minnesota 56172

Laura Rowen, MPH

State Office of Rural Health and Primary Care

450 West State Street, 4th Floor

P.O. Box 83720

Boise, Idaho 83720-0036

Traffic Analysis Zones (TAZs) Program

The Census Bureau worked closely with a number of organizations to develop the TAZ delineation program. In particular, over the course of several years, consultations and meetings were held regularly

with representatives from the Federal Highway Administration (FHWA) and the American Association of

State Highway and Transportation Officials (AASHTO), who communicated transportation community

needs and requirements for TAZ delineation to the Census Bureau. Comments and feedback were

generally positive, and most were incorporated into the specifications of the TAZ delineation program.

The Census Bureau discussed TAZ delineation in the following meetings:

The monthly CTPP Technical Working Group (jointly sponsored by FHWA and AASHTO)

The AASHTO Standing Committee on Planning's Census Data Work Group

National webinar conferences on the CTPP project (jointly sponsored by FHWA and AASHTO)

In addition to FHWA and AASHTO, the members of the working groups and attendees of the webinars

included people representing:

Metropolitan Planning Organizations (MPOs)

State Departments of Transportation

Federal Transit Administration (FTA)

Research and Innovative Technology Administrative (RITA) of the U.S. Department of

Transportation

Cambridge Systematics Inc., a contractor and collaborator with FHWA

In particular, instrumental members were:

Federal Highway Administration:

Elaine Murakami

Telephone: 206-220-4460

Email: elaine.murakami@fhwa.dot.gov

Ed Christopher

Telephone: 708-283-3534

Email: edc@berwyned.com

American Association of State Highway and Transportation Officials:

Jonette Kreideweis

Minnesota DOT

651-366-3854

Email: jonette.kreideweis@dot.state.mn.us

School District Review Program

The National Center for Education Statistics (NCES) sponsors the School District Boundary Review on a

cost reimbursable basis and the Census Bureau works closely with the NCES to develop the requirements,

schedule and products for the SDRP. Geography Division staff have presented information about the

SDRP at NCES sponsored conferences attended by school district officials, Title 1 Coordinators and

Common Core of Data Coordinators. Primary contacts for our work at the NCES are:

William C. Sonnenberg

Statistician

Annual Reports Program-NCES

Telephone: 202-502-7453

Email: William.Sonnenberg@ed.gov

Tai A. Phan

Mathematical Statistician

Elementary/Secondary & Libraries Studies Division NCES

Telephone: 202-502-7431

Email: <u>Tai.Phan@ed.gov</u>

Question 9. Paying Respondents

We do not pay respondents nor provide them with gifts for responding.

Question 10. Assurance of Confidentiality

All confidential information, such as address information and latitude/longitude structure points associated

with residential addresses, will be held in strict confidence according to the provisions of Title 13, United

States Code, Section 9. The Census Bureau staff will give notice to program participants working with

this information that they are required to protect the confidentiality of those data and will set forth

guidelines and procedures for their physical and information technology protection. Census Bureau field

representatives will use this notice to inform each respondent that any information given to the Census

Bureau will be held in strict confidence and that respondent participation is voluntary. P.L. 103-430

allows the Census Bureau to share its address information with State/local/tribal government officials

designated as "Census Liaisons," but requires these officials to maintain the strict confidentiality

provisions of Title 13 U.S.C., Section 214 that imposes strict penalties for unauthorized disclosures of

census information.

Question 11. Justification for Sensitive Questions

None of the questions asked during the activities described above are of a sensitive nature, and they should not pose any problem for respondents in that respect.

Question 12. Estimate of Hour Burden

The following table shows the calculation of burden for FYs 2009, 2010, and 2011.

Activity	FY 2009 Respondents	FY 2010 Respondents	FY 2011 Respondents	Average Hours per Respondent	FY2009 Burden Hours	FY 2010 Burden Hours	FY 2011 Burden Hours
LUCA Appeals		3,000		28		84,000	
PSAP	2,500			48	120,000		
TSAP	650			48	31,200		
Redistricting	52			642.88	33,430		
New Construction		6,400		48		307,200	
Traffic Analysis Zones			450	133.33			60,000

School Districts	51	51		FY09=100 FY10=20	5,100	1,020	
Totals	3,253	6,451	450		185,630	312,300	60,000

All estimates of burden per response are derived from the Census Bureau's experience conducting the same or similar activities previously.

Question 13. Estimate of Cost Burden

The only expected cost to respondents is their time to respond. For government entities, the information requested is of the type and scope normally carried in records and no special hardware or accounting software or system is necessary to provide answers to this information collection. For some programs where software reduces the collection burden, free software is provided. Therefore, respondents are not expected to incur any capital and 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 annual cost to the Federal Government associated with each activity will be provided in the clearance request that will precede the activity.

Question 15. Reason for Change in Burden

The change in burden is due to the addition of programs.

Question 16. Project Schedule

The chart in Question 12 and the description of each activity in Question 1 give an approximate time frame for each activity. A schedule for completing each activity will be provided in the clearance request that will precede the activity.

Question 17. Request Not to Display Expiration Date

We will display the expiration date on the Information Collection Forms and on the Privacy Act Notice given to respondents.

Question 18. Exceptions to the Certification

There are no exceptions.