

SUPPORTING STATEMENT  
U.S. Department of Commerce  
U.S. Census Bureau  
Boundary and Annexation Survey, Boundary Validation Program  
OMB Control Number 0607-0151

**Part A – Justification**

Question 1. Necessity of the Information Collection

The U.S. Census Bureau is requesting an extension with revision to the Paperwork Reduction Act clearance for the Boundary and Annexation Survey (BAS) in order to continue the current BAS and to conduct the Boundary Validation Program (BVP). The BAS is conducted annually to collect information about selected legally defined geographic areas, such as counties (and equivalent areas), incorporated places, minor civil divisions (MCDs), as well as federally recognized American Indian reservations, including off-reservation trust land and tribal subdivisions. The BVP is conducted every ten years to provide the highest elected or appointed official (HEO) an opportunity to review the boundary data collected during the BAS over the last decade. The 2010 BVP is conducted in parallel with the 2010 BAS.

The BVP validates the following actions by governmental units, as reported in the BAS:

- The creation of newly incorporated places and MCDs
- The creation of new counties, and the addition of new federally recognized American Indian areas (AIAs)<sup>1</sup>
- The dissolution of incorporated places and MCDs
- The changes in the boundaries of incorporated places, MCDs, counties, barrios, subbarrios, municipios, consolidated cities, and AIANNHAs<sup>2</sup>.

The results of the BAS and BVP provide geographic information to support the following products and/or services:

- Decennial and economic censuses
- American Community Survey
- Population Estimates Program
- OMB Circular A-16 Responsibilities for:
  - Geospatial One Stop E-GOV Initiative
  - Federal Geographic Data Committee (FGDC) Responsibilities for:
    - FGDC Subcommittee on Cultural and Demographic Data
    - Boundaries
- U.S. Geological Survey (USGS) Initiative on The National Map
- Federal Information Processing Standards (FIPS) program
- Geographic Names Information Systems (GNIS) program

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<sup>1</sup> AIAs American Indian Areas include reservations and/or off-reservation trust lands and tribal subdivisions

<sup>2</sup> AIANNHAs American Indian, Alaska Native, Native Hawaiian Areas include reservations and/or off-reservation trust lands and tribal subdivisions, Alaska Native Regional Corporations (ANRCs) and Hawaiian home lands.

The BAS and BVP fulfill the requirements specified in Title 13, United States Code, Section 6.

The BVP is conducted only during the year of the decennial census, whereas the BAS is conducted annually. The 2010 BVP will include all actively functioning counties or statistically equivalent entities, incorporated places (including consolidated cities), minor civil divisions (MCDs), all federally recognized American Indian reservations (AIRs) and off-reservation trust land entities in the United States, and municipios, barrios and subbarrios in Puerto Rico. In addition, the Census Bureau will send a letter to the governor of each state explaining the 2010 BVP process and advising them that state boundaries will be reviewed in conjunction with relevant counties boundaries as part of the BVP.

The 2010 BVP will be conducted in two phases, initial and final. During the initial BVP phase, every HEO in the BAS universe will receive a BVP form, a letter with instructions, and a CD containing a complete set of 2010 BAS maps in .pdf format for their governmental unit. The HEO is asked to review the 2010 BAS maps on the CD and return the BVP form. An HEO may respond to the BVP in one of two ways:

- Return the BVP form indicating that the boundary for their governmental unit is correct.
- Return the BVP form indicating that the boundary for their governmental unit is incorrect and that they will be submitting changes through BAS.

If the HEO determines that there are no changes to report, the HEO will sign and return the validated BVP form. The form can be returned electronically, by fax or mail. If the HEO determines that boundary changes are needed, the HEO will be instructed to return the unsigned BVP form and work with their local BAS contact to submit changes through the BAS process. If either the HEO or the BAS contact submits 2010 BAS updates by March 1, 2010, the entity will be included in the second and final phase of the BVP.

In the final BVP phase, once the timely 2010 BAS updates are applied to the Master Address File/Topologically Integrated Geographic Encoding and Referencing (MAF/TIGER) database, each HEO is provided a complete set of updated paper maps. This is their final opportunity to review the boundary and verify that the BAS 2010 changes are reflected. In the final BVP phase, each HEO submits any remaining corrections directly to the Census Bureau using the instructions provided in the BAS respondent guide.

## Question 2. Needs and Uses

The data and information collected from the BAS and BVP serve federal, state, local, and tribal governments, and the private sector. The BVP provides validation for the information collected through the BAS. The BAS is the primary provider for the following services and products:

- Data collection for the decennial and economic censuses, and annual surveys
- Primary data of on new municipal incorporations and disincorporations
- Legal boundary changes for governmental units
- Inventory for the FIPS and GNIS programs

- Updates of population estimates for governments including: the creation of new governments; the dissolution of governments; or changes in boundaries for local or tribal governments
- Legal boundary framework layer for the FGDC National Spatial Data Infrastructure, the USGS National Map, and the E-GOV Geospatial One Stop

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 Census Bureau has made, and continues to make every effort to incorporate the use of digital files and the Internet as tools for government responding to the BAS and BVP. In an effort to limit duplicate materials received by local governments, BVP participants will receive BAS maps in digital form. Paper maps or digital shapefiles will be available upon request. Participants may respond to the BVP electronically, thus reducing the respondent burden. The Census Bureau estimates that approximately twenty-five percent of the local governments will respond electronically to the BVP.

The Internet will also play a large part in providing the public access to Census Bureau boundary data. The Census Bureau provides updated governmental unit boundaries for inclusion in USGS's The National Map and to the OMB Geospatial One Stop E-GOV initiative. In addition, boundaries surveyed through the BAS are released twice a year as shapefiles that are available on the Census Bureau's Web site for download. These updated boundaries are also displayed in the American FactFinder, the Census Bureau's Internet data dissemination vehicle. In addition, electronic maps will be posted to the Web in a PDF format.

### Question 4. Efforts to Identify Duplication

The information collected in the BAS and BVP can be obtained only from local and tribal officials. There is no similar information available on a consistent national basis that could be used or modified for the purpose described.

### Question 5. Minimizing Burden

To reduce the burden on respondents, the Census Bureau has simplified the BVP process. The BVP package includes a one page letter, a one page form and a CD with BAS maps in digital format. The form is short and can be quickly reviewed. The form asks the participants if the boundaries for their governmental unit are correct and to verify their current contact information. If the boundaries for their governmental unit are correct, the respondent checks the appropriate box and returns the completed form to the Census Bureau. If the boundaries for their governmental unit are incorrect, changes are submitted through the BAS process, not through the BVP.

### Question 6. Consequences of Less Frequent Collection

The BVP provides the only opportunity for highest elected officials to validate their legal status and legal boundaries. Conducting the program less frequently could result in data tabulations that do not reflect jurisdictions accurately for the economic and Decennial censuses, American Community Survey, other surveys and the annual Population Estimates program.

### Question 7: Special Circumstances

There are no special circumstances. Data collection is conducted in a manner consistent with the Office of Management and Budget (OMB) guidelines.

### Question 8. Consultations Outside the Agency

The purpose, methodology, and problems of the BAS and BVP are discussed with county, state, and tribal officials, plus a network of frequent users of Census Bureau data, during periodical local and national meetings of municipal, MCD, county, state, and tribal governments. Discrepancies in the maps are discussed periodically with governmental officials at the time the officials are contacted during problem resolution. As the primary stakeholders in the accuracy of boundary information and the resulting data, respondents are cooperative and willing to provide BAS information. The following is a representative sample of the individuals with whom we have consulted:

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During conversations with these individuals, comments were favorable concerning the survey.

A *Federal Register* Notice announcing our intention to request revision of the BAS program was published on August 24, 2009, Vol. 74, No. 162, on page 42,647. We received one letter of support in response to that notice.

#### Question 9. Paying Respondents

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

#### Question 10. Assurance of Confidentiality

All of the information requested in this survey is public data of a nonsensitive nature. The information requested is typically made available to individuals upon request to participating officials. In addition, the Census Bureau informs the participant of the OMB approval number, expiration date, reasons for data collection, and that responses are voluntary.

Question 11. Justification for Sensitive Questions

There are no questions of a sensitive nature in this survey.

Question 12. Estimate of Hour Burden

The projected number of respondents and the estimated burden for the survey are indicated in the following:

Estimated Number of Respondents:

<u>Response Type</u>	<u>Entity Count</u>
BAS Respondents	34,000
BAS Response with no updates or no response	21,000
BAS Response with updates	13,000
BVP Initial Phase	40,000
BVP Final Phase	8,000

Estimated Time per Response:

<u>Response Type</u>	<u>Time</u>
BAS No updates or no response	30 minutes – 4 hours
BAS Updates	6 hours
BVP Initial Phase	2 hours
BVP Final Phase	2 hours

Total Hours per Year:

<u>Response Type</u>	<u>Hours</u>
BAS No updates or no response	67,750
BAS Packages with changes	78,000
BVP Initial Phase	80,000
BVP Final Phase	<u>16,000</u>
Total	241,750

The estimated hours of burden were established using the following criteria. There are approximately 40,000 governmental units included in the BAS and BVP. The number of BAS respondents is estimated to be only 34,000 since approximately 6,000 entities are part of a consolidated agreement with participating states.

The BVP Initial universe is approximately 40,000 legal entities. The universe for the 2010 BVP Final is determined by the number of entities that respond to the 2010 BAS with boundary

changes. Based on past BAS response rates, we estimate that the 2010 BVP Final universe will be approximately 8,000 legal entities.

The BVP requests only that the HEO review and verify legal boundaries. If the boundaries for an entity are incorrect, we request that HEO work with their BAS contact to submit changes. All boundary changes or corrections are to be made through the BAS process. Therefore, we estimate that the additional time burden for the BVP is no more two hours per entity.

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 estimate to conduct the BAS was approximately \$17,000,000 in 2008. The cost was estimated to increase each year by approximately 3%. This included costs for the Census Bureau's National Processing Center (NPC), Regional Offices, and Headquarters. The Geographic Areas Branch and the Geographic Programs Budget Branch within the Geography Division, Census Bureau, have reviewed all requirements for conducting the BAS, including material and person-hour costs to arrive at this estimate and have determined that the resources are available for efficient administration of the BAS. The additional cost to conduct the BVP in 2010 is estimated to be \$8,000,000.

Question 15. Reason for Change in Burden

The change in burden is due to the addition of the BVP to the BAS.

Question 16. Project Schedule

The following is the general schedule for the BAS and BVP:

<u>Month</u>	<u>Activity</u>
August	Prepare for BAS advance response
September	Advance Response mail-out, e-mail, and FAX, or States with specified agreements notify us of participants
October	Start staging or preparing mail-out of BAS materials

October	Complete staging or preparing mail-out of BAS materials
November	Mail-out of BAS packages Start receiving and processing BAS returns
December	Start staging or preparing mail-out of BVP Initial materials
December	Complete staging or preparing mail-out of BVP Initial materials
January	Mail-out of BVP initial packages Start receiving and processing BVP returns
January - February	BAS and BVP Non-response follow-up
March 1st	Deadline to be included in the Population Estimated and ACS data delivery and to be included in the BVP Final Universe
April	Start staging or preparing mail-out of BVP Final materials
May	Complete staging or preparing mail-out of BVP Final materials
June	Mail-out of BVP Final packages Start receiving and processing BVP Final returns
July	Complete processing of BAS and BVP Final packages
July	Deadline for package return to be included in the Decennial Census data delivery
All year	Writing requirements and procedures Processing of data Responding to participants Providing training of staff and participants Attending conferences Developing tracking control systems Identifying more efficient methods to implement and process the BAS and BVP

Question 17. Request to Not Display Expiration Date

We will display the assigned expiration date of this information collection on the BAS and BVP forms.

Question 18. Exceptions to the Certification

There are no exceptions.



## **Part B – Collection of Information Employing Statistical Methods**

The collection of boundary information and changes in legal status does not lend itself to statistical methods, such as sampling or estimation procedures, because of the legal implications inherent in the correct location of every municipal, county, MCD, AIA, and ANRC boundary and the need to provide a complete inventory of governments for use in Census Bureau and other programs.

### **Attachments**

- A BVP Letters
- B BVP Forms
  - BVP-1 Initial BVP
  - BVP-2 Final BVP
- C BVP Estimate of Burden Insert