

SUPPORTING STATEMENT
U.S. Department of Commerce
U.S. Census Bureau
Government Units Survey
OMB Control Number 0607-0930

Part A - Justification

1. Necessity of the Information Collection

Title 13, Section 161, of the United States Code requires the Secretary of Commerce to conduct a Census of Governments every fifth year. This information request covers the questionnaire needed to conduct the directory survey of the 2012 Census of Governments. The 2011 Government Units Survey (Attachment A) will be used to update the universe list of public sector entities for the 2012 Census of Governments. Each of the estimated 76,500 non-school governments will be sent a form. Respondents will be asked to verify or correct the name and mailing address of the government, answer the questions on the form, and return the form.

The directory survey for the 2007 Census of Governments, form G-30 (OMB #0607-0930), was mailed to special district governments only. The form collected only basic information on the governing board, authorizing legislation, the Web address, agency activity, and employment and payroll data. The employment and payroll data were used in lieu of a response to the March 2007 Census of Governments: Employment, for special district governments. The Government Units Survey (GUS) collects more data and will be mailed to municipalities, townships, counties, and special districts. The GUS consists of nine broad content areas: background information, debt, license and permit fees, taxes, retirement/pension plan, government activity, public services, judicial or legal activities, and finance. The first eight content areas consist predominantly of yes/no questions and are designed to collect information on the general characteristics of the government. The finance section of the questionnaire requests four numerical values: payroll, expenditures, revenues, and debt.

2. Needs and Uses

The GUS serves multiple purposes. The GUS will be used to produce the official count of local government units in the United States; to obtain descriptive information on the basic characteristics of governments; to identify and delete inactive units from the official list of public entities maintained by the Governments Division of the Census Bureau; to identify file duplicates and units that were dependent on other governments; and to update and verify the mailing addresses of governments. The basic characteristics collected with the GUS will allow us to reduce the burden on small governments by improving small area estimates and imputation methods from a smaller sample size.

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.

3. Use of Information Technology

The GUS will use information technology to reduce respondent burden. The GUS will be accomplished using mail-out/mail-back survey forms and Internet response forms. Respondents have the choice of either returning forms via mail or completing the questionnaire via the Web. Instructions for reporting on the Web will be included in the original mail-out as well as in the follow up mail-out.

The GUS will employ automated check-in procedures which include imprinting unit ID barcodes on the survey forms, scanning barcodes on returned forms, and using associated software to generate check-in files and follow up mail files. The GUS will also use dashboards to guide the non-response follow up process.

4. Efforts to Identify Duplication

The Government Units Survey does not duplicate any other data collection. The Census of Governments is the only source of nationwide data on government organization. There are no other comprehensive sources of national information.

5. Minimizing Burden

The GUS asks a series of yes/no questions in an effort to reduce the overall burden the data collection poses on respondents. The GUS pilot study indicated that about 59 percent of small governments found the questionnaire to be somewhat easy to complete. In an effort to further reduce the burden on small governments, respondents have the option of responding to the survey via a web application.

6. Consequences of Less Frequent Collection

This survey is conducted only once every five years. Anything less frequent would be insufficient to keep up with changes in the universe of governments. Changes in the universe of special districts governments, in particular, tend to be substantial over a five-year period.

7. Special Circumstances

There are no special circumstances.

8. Consultations Outside the Agency

The notice inviting the public to comment on plans to submit this request was published in the Federal Register (Vol. 76 No. 81) on April 27, 2011 on page 23541. The notice received one public comment expressing the need for the Census Bureau to use data from last year as a means of reducing the cost to the Census Bureau of the data collection. The last directory survey for the Census of Governments was conducted five years ago. In addition, the GUS has a broader scope than the previous directory survey; thus, the Census Bureau is unable to use data for previous years to accomplish the objectives of this survey. The Census Bureau, however, has moved to reduce the cost of the survey by omitting school district governments from the data collection and by encouraging electronic data reporting.

Data sets measuring activity in the public sector of the economy are produced using the universe of all governments and samples drawn from the universe. Consultation with the Bureau of Economic Analysis (BEA), a major data user of both the Census of Governments and sample data products, occurs at frequent intervals. Analysts at BEA in recent meetings have emphasized the importance of covering all entities in the public and private sectors of the economy, the importance of covering them once and only once, and in keeping the public and private components separate. Federal legislation relevant to the American workforce, the Fair Labor Standards Act (FLSA) and the Family Medical Leave Act, refer to the list of governments maintained by the Census Bureau for purposes of administering provisions of these laws. The Bureau of Justice Statistics maintains an interest in the list of active governments and their activities for purposes of administering grant programs. In addition, users from academia, research organizations, governments, public interest groups, and various businesses provide evidence of their interest through requests for information and requests for assistance in accessing universe information available on the Census Bureau internet web site. A representative list of our data users is attached to this request (Attachment B).

9. Paying Respondents

No payments or gifts will be provided to respondents. The respondents are local government public officials who provide information on a voluntary basis.

10. Assurance of Confidentiality

The GUS does not collect any confidential data. These data are subject to provisions of Title 13, United States Code, Section 9 exempting data that are customarily provided in public records from rules of confidentiality. Participants in the survey will receive a letter from the Director of the Census Bureau stating that this is a voluntary survey and asking for their cooperation in completing the survey. This letter is included in Attachment C.

11. Justification for Sensitive Questions

No questions of a sensitive nature are asked.

12. Estimate of Hour Burden

The directory survey is conducted every five years. We based the work hours per response on the pilot survey conducted in preparation for the GUS. This is a national form that will be sent to local government officials. These governments differ widely in the population served and the extent and complexity of their organizations. We estimate the median public reporting burden to be 45 minutes.

The GUS respondent burden is as follows:

Respondent Burden Hours

a. Number of respondents	76,500
b. Reports annually per respondent	1
c. Total respondents	76,500
d. Estimated work hours per response	0.75
e. Estimated respondent burden hours	57,375

Respondent Burden Cost

a. Estimated respondent burden hours	57,375
b. Estimated cost per burden hour	\$24.25
c. Total estimated cost to respondents	\$1,391,344

“Estimated cost per burden hour” is based on data from the 2009 Public Employment Data. The “Estimated cost per burden hour” is derived from the total monthly pay for full-time local government employees divided by the number of full-time local government employees reported at the *Financial Administration* function and converted to an hourly rate assuming an average forty hour work week. The “Estimated cost per burden hour” is multiplied by the “Total estimated burden hours” to calculate the “Total estimated cost to respondents.”

13. Estimate of Cost Burden

We do not expect respondents to incur any costs other than that of their time to respond. The information requested is of the type and scope normally carried in official 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 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.

14. Cost to Federal Government

The estimated cost for the Government Units Survey is projected to be \$5.4 million.

15. Reason for Change in Burden

The increase in burden is attributable to the information collection being submitted as a reinstatement.

16. Project Schedule

	Start Date	Finish Date
Data Collection	October 2011	May 2012
Data Processing	December 2011	August 2012
Product Releases	August 2012	December 2013

17. Request to Not Display Expiration Date

The OMB expiration date will be displayed on the survey forms.

18. Exceptions to Certification

There are no exceptions to the certification statement.