

Supporting Statement for
Office of Management and Budget Approval of
U.S. Census Bureau Boundary and Annexation Survey Forms
OMB Control No. 0607-0151

Part A – Justification

Question 1. Necessity of the Information Collection

This request is for the clearance of forms to continue the annual Boundary and Annexation Survey (BAS). The U.S. Census Bureau is requesting a revision of a currently approved collection.

The results of the BAS are needed to provide information documenting the creation of newly incorporated municipalities, minor civil divisions (MCDs), counties, federally recognized American Indian areas (AIAs, which include reservations and/or off-reservation trust lands), and Alaska Native Regional Corporations (ANRCs), the dissolution of incorporated municipalities and MCDs, and changes in the boundaries of municipalities, MCDs, counties, AIAs, and ANRCs. The BAS information is used to provide an appropriate record for reporting the results of the decennial and economic censuses; annual surveys to support the annual population estimates program, and the American Community Survey, to update the municipal, MCD, county, AIA, and ANRC inventory for compliance with responsibilities specified in the OMB Circular A-16 Governmental Units and Administrative and Statistical Boundaries Data Theme that supports the spatial data steward responsibilities of the OMB E-Gov, Data.gov, The National Map, and to update the Geographic Names Information Systems (GNIS). The BAS information fulfills the requirements specified in Title 13, United States Code, Section 6.

The BAS universe and mailing materials vary depending both upon the needs of the Census Bureau in fulfilling its censuses and household surveys, and upon budget constraints.

Counties or equivalent entities federally recognized American Indian reservations, off-reservation trust lands, and tribal subdivisions are included in every BAS.

In the years ending in 8, 9 and 0, the BAS includes all governmentally active counties and equivalent entities, incorporated places, and legally defined minor civil divisions, and legally defined federally recognized American Indian and Alaska Native areas (including the Alaska Native Regional Corporations). Each governmental entity surveyed will receive materials covering its jurisdiction and one or more forms. These three years coincide with the Census Bureau's preparation for the decennial census. There are less than 40,000 governments in the universe each year.

In all other years, the BAS reporting universe includes all legally defined federally recognized American Indian and Alaska Native areas, all governmental counties and equivalent entities, minor civil divisions in the six New England States and those incorporated places that have a

population of 2,500 or greater. The reporting universe is approximately 14,000 governments. The Census Bureau follows up on a subset of governments designated as the reporting universe.

In the years ending in 1 through 7, the Census Bureau may enter into agreements with individual States to modify the universe of minor civil divisions and/or incorporated places to include additional entities that are known by that State to have had boundary changes, without regard to population size. Each year, the BAS will also include each year a single respondent request for municipio, barrio, barrio-pueblo, and subbarrio boundary and status information in Puerto Rico and Hawaiian Homeland boundary and status information in Hawaii.

No other Federal agency collects these data nor is there a standard collection of this information at the State level. The Census Bureau's BAS is a unique survey providing a standard result for use by federal, state, local, and tribal governments and by commercial, private, and public organizations.

As part of our partnerships developed with state and county governments, the universe is modified with local knowledge to target those governments known to have changes and delete governments with no changes to minimize unnecessary burden.

The final stage is the State Certification program, which is designed to allow the state level agencies to verify that the status and boundary updates received through the annual BAS were accomplished according to state law. During each cycle of this program, Governor-designated State Certifying Officials (SCO) review listings of incorporated place legal boundary and functional status changes reported to the BAS during the previous year. The extent of the State Certification program varies depending on the laws governing annexations, deannexations, incorporations, and disincorporations in the given state. Some states have strong laws that require local governments to report legal boundary changes to the state government. In these strong law states, the SCO is able to certify, edit, add, or reverse reported annexations, and they may mark a legal boundary change as a duplicate of a previously reported change. In these states, the SCO also has the authority to request that the Census Bureau edit or delete information received from the local government. In states that do not require local governments to report legal boundary changes to the state ("weak law" states), the Census Bureau will not edit or delete information without confirmation from the local government. If the SCO adds legal boundary changes missing from the Census Bureau's annexation list, the Census Bureau will contact the local government to request information. The State Certification program helps to ensure that all levels of government represent boundaries consistently and accurately.

This year we are introducing the Cadastral Data pilot as part of the BAS program. The Census Bureau will conduct this pilot project related to the use of cadastral data in boundary updates. A large proportion of the legal boundaries collected by the BAS follow cadastral features such as Public Land Survey System (PLSS) lines and parcel boundaries. This cadastral data has become far more widely available in recent years. For the Cadastral Data pilot, the Census Bureau will work with a set of fourteen state and county participants to develop innovative methods for using the PLSS and parcel datasets to assess, improve, and maintain the quality of legal boundaries in the MTDB.

In addition, this package includes the removal the Boundary Validation Program (BVP). The BVP is conducted only for the year of the decennial census.

Question 2. Needs and Uses

The BAS information is used to: 1) classify data collected in the periodic decennial and economic censuses and annual surveys; 2) serve as the primary source of information regarding new incorporations, disincorporations, and other changes in the local and tribal government inventory for the FIPS and GNIS programs, state and local officials, and private data users, 3) update its estimates of the population as a result of the creation of new governments, the dissolution of governments, or changes in boundaries for existing local or tribal governments, 4) serve as the source for governmental unit boundary information as a framework layer of the National Spatial Data Infrastructure for The National Map and the data.gov website.

Information quality is an integral part of the pre-dissemination review of the information disseminated by the Census Bureau. Information quality is also integral to the information collections conducted by the Census Bureau and we incorporate it into the clearance process required by the Paperwork Reduction Act.

Question 3. Use of Information Technology

The Census Bureau continually researches and develops new technology in the fields of Geographic Information Systems (GIS) and Web services to lessen the burden of our BAS partners. Our digital partners have multiple options for participating in the BAS each year, and the Census Bureau provides the MAF/TIGER Partnership Software (MTPS) GIS free of charge to all BAS participants wishing to participate digitally. The MTPS is a specifically designed boundary and feature update tool that guides our BAS partners through each step of the update process, and the software will format and package their updates for easy submission to the Census Bureau for processing.

The Internet also plays a significant role in providing the public access to Census Bureau boundary data. The MTPS, along with its accompanying spatial data files, are available for download free from the Census Bureau's Internet site, or the Census Bureau, upon request, can send the BAS materials to the participant via DVD. Our paper map participants can also download digital representations of their boundaries from the internet in PDF format, or they can request a DVD of their PDF maps. The Census Bureau also displays updated boundaries in American FactFinder, the Census Bureau's Internet data dissemination vehicle.

The Census Bureau is rolling out a new easy-to-use Web mapping service (TIGERweb) enabling participants to compare to view their boundaries in relationship to other geographic areas and imagery. Moreover, we are currently researching and developing new Crowd Sourcing and Volunteered Geographic Information methods, which will eventually give our partners the ability to make updates to their boundaries on the Web.

Finally, the BAS partners have an opportunity to respond to the survey electronically. We believe that at least 50% of the reporting universe partners who respond will do so electronically. A partner may report a “no change” response through FAX, e-mail or on-line electronically as well as the paper postcard or letter. In addition, a partner may send in their changes for the boundaries and features electronically through e-mail, file transfer protocol (FTP) or by mailing us CD/DVD media.

Question 4. Efforts to Identify Duplication

The boundary data can be best obtained and updated only from tribal, state, county, and local governments. The Census Bureau is the designated federal agency through OMB Circular A-16 steward for the Governmental Units and Administrative and Statistical Boundaries Data Theme. There is no similar federal boundary data collection occurring on a consistent national basis.

Question 5. Minimizing Burden

To reduce the burden on respondents, the Census Bureau will accept and use digital files and in addition will offer an electronic response option for those files that meet quality standards. The governments that use a digital file option or electronic form option do not need to use the corresponding paper materials.

To reduce cost and respondent burden, the Census Bureau also produces a simplified set of materials (small-scale maps and forms) for entities that reported no changes in the last BAS. This does not limit participation; all materials are available if needed for reporting changes. In addition, our state partners have assisted in identifying governments with change so that the BAS targets only to those entities.

The Census Bureau offers two types of consolidated responses for governmental units to respond to the BAS. The first type of consolidated response is the consolidated BAS program (CBAS). The Census Bureau offers consolidation agreements to counties that are interested in submitting boundary changes for the legal governments (incorporated places and minor civil divisions) within their jurisdiction. The CBAS provides counties with an opportunity to report boundary and feature changes for some or all of the legal governments within their county in order to reduce the burden on local governments and to avoid the duplication of effort.

The second type of consolidated response offered by the Census Bureau is a state agreement. Two types of BAS state agreements are available to states that enforce laws requiring local governments to report all boundary changes to a designated state agency. Under the first type of agreement, the state reports boundary changes for all incorporated places, minor civil divisions (if applicable), and counties within its jurisdiction to the BAS. Under the second type of agreement, the state provides the Census Bureau with a list of local governments that reported boundary changes to the state. The Census Bureau uses this list to target those specified local governments for the BAS. Through this partnership, the Census Bureau aims to reduce the duplication of effort among the various levels of government and to reduce the cost burden associated with the annual BAS.

Question 6. Consequences of Less Frequent Collection

The BAS must be continued on an annual basis. Conducting the survey less frequently would greatly reduce the efficiency of preparing for the economic and decennial censuses, surveys, the on-going American Community Survey, and the annual population estimates. In addition, it would disrupt the flow of information to the agencies that use this information in administering their programs. The BAS is the only current federal source of a nationally consistent inventory of governments, their legal status, and their boundaries.

Question 7: Special Circumstances

Data collection for BAS follows the guidelines of the Office of Management and Budget (OMB) when conducting the survey.

Question 8: Consultations Outside the Agency

The purpose, methodology, and problems of the BAS 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 we have consulted with during 2012.

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During conversations with these individuals, comments were favorable concerning the survey and all issues are resolved.

The *Federal Register* Notice announcement publication date is on August 22, 2012 (77 FR pp. 50677-80). We received no comments during the consideration period ending October 22, 2012.

Question 9. Paying Respondents

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

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Question 10. Assurance of Confidentiality

All information requested in this survey is public information of a nonsensitive nature and normally would be available to any person requesting it by participating officials. The Census Bureau informs the respondent of the voluntary nature of this survey in the introductory letter. In addition, the Census Bureau provides the OMB approval number, expiration date, and reasons for data collection.

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 2013 through 2015 surveys in the following:

Estimated Number of Respondents:

Annual Response Notification: 39,400.
 No Change Response: 25,000.
 Reporting Universe Telephone Follow-up: 14,000.
 Packages with Changes: 5,000.
 State Certification Review: 50.
 State Certification Local Review: 1,000.
 Cadastral Data Pilot: 14.
 TOTAL: 84,464

Estimated Time per Response:

Annual Response Notification: 30 min.
 No Change Response: 4 hours.
 Telephone Follow-up: 30 min.
 Packages with Changes: 8 hours.
 State Certification Review: 10 hours.
 State Certification Local Review: 2 hours.
 Cadastral Data Pilot: 12 hours.

Total Hours per Year:

Annual Response Notification: 19,700.
 No Change Response: 100,000.
 Telephone Follow-up: 7,000.
 Packages with Changes: 40,000.
 State Certification Review: 500.
 State Certification Local Review: 2,000.

Cadastral Data Pilot: 168.

Total Hours: 169,368.

Estimated Total Annual Cost: \$3,661,736.00.

Question 13. Estimate 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 of Federal Government

The estimate to conduct the BAS is approximately \$8,000,000 for each clearance year. 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.

Question 15. Reason for Change in Burden

The reason for the decrease in burden hours from the current OMB approval is due to the reduction of governmental universe and the removal of BVP.

Question 16. Project Schedule for Each Survey Year

<u>Month</u>	<u>Activity</u>
August	Review and QC BAS products for the participants (letters, forms, maps, shapefiles, etc.)
September	Prepare for BAS annual response using e-mail and FAX
October	Create BAS partnership shapefiles and BAS maps in PDF format for posting on the web Start posting data on the BAS homepage Start staging or preparing mail-out of BAS materials

November	<p>Create BAS letter and forms in an electronic format for posting on web and on-demand printing</p> <p>Complete posting of BAS materials on the Bas homepage</p> <p>Complete staging or preparing mail-out of BAS materials</p> <p>Send discrepancy letters to governments the State Certification Official identified as differences.</p>
December	<p>Annual response conducted by e-mail and FAX for all governments</p> <p>Conduct BAS on-site workshops begin</p>
December (continued)	<p>State receiving e-mail and FAX notification for request materials for shipping to participant.</p> <p>Participants start downloading materials digitally for review and submission</p> <p>Mail-out of BAS packages begins</p> <p>Start receiving no change notifications from participants</p> <p>Start receiving BAS returns and pre-processing begins and continues through out July</p> <p>Send State Certification Letter to Governor to designate state certifying official (SCO)</p>
January	<p>Conduct BAS webinar workshops</p> <p>Non-response to annual response telephone calls begin for the reporting universe of governments</p> <p>Processing and Verification of BAS returns begin for legal changes with an effective date of January 1st of current survey year</p>
February	<p>Conduct BAS on-site workshops end</p> <p>Updates into the MAF/TIGER database and Quality Control review begins for legal changes with an effective date of January 1st of current survey year</p> <p>The State Data Centers invited to participate with telephone follow-up for BAS and responses status of participation for BAS reporting universe</p>
March 1 st	<p>Deadline for governments to return BAS package for inclusion in the Population Estimate Program and American Community Survey product delivery</p>
March	<p>The State Data Centers participate in telephone follow-up for BAS reporting universe</p> <p>Send SCO materials for review and update for State Certification</p>
March 30 th	<p>BAS required reaching a 40% response rate for reporting universe</p>

April	Complete Processing and Verification of BAS returns for legal changes with an effective date of January 1 st of current survey year BAS package requests and shipping ends
May	Complete updates into the MAF/TIGER database and Quality Control review for legal changes with an effective date of January 1 st of current survey year and received by March 1 st Final QC of legal updates by Headquarters before releasing to product creation Processing and Verification of BAS returns begin for packages return after March 1 st
May 31 st	Deadline for governments to return BAS package for inclusion in the following BAS materials and other Census products inclusion of all boundary updates with an effective date of January 1 st of the next survey year as well as all other types of updates submitted (feature, landmarks, etc.)
June 1 st	State Certification completion deadline
June	Start review all stages of product creation for the American Community Survey and Population Estimates Program
June 30 th	BAS required reaching a 80% response rate for reporting universe
July	Updates into the MAF/TIGER database and Quality Control review begins for all returned packages with a priority on boundaries first then features Complete Processing and Verification of BAS returns received by May 31 st Complete review all stages of product creation for the American Community Survey and Population Estimates Program
August	Complete updates into the MAF/TIGER database and Quality Control Review Final QC of all updates by Headquarters before releasing to product creation Start review all stages of product creation for the Boundary and Annexation Survey
September 1 st	Complete processing and update of State Certification returns
September	Complete review all stages of product creation for the Boundary and Annexation Survey for spatial product datasets only
September 30 th	BAS required reaching a 85% response rate for reporting universe

All year

- Writing requirements and procedures
- Processing of data
- Responding to participants through e-mail and phone
- Providing training of staff and participants
- Attending conferences
- Developing tracking control systems
- Identifying more efficient methods to implement and process the BAS

Question 17. Request to Not Display Expiration Date

We wish to display the assigned expiration date of this information collection on the BAS forms.

Question 18. Exception to the Certification

There are no exceptions.

Part B – Collections 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. In addition, the collection of the boundary data meets the requirements and stewardship of spatial data for the OMB Circular A-16 Governmental Units and Administrative and Statistical Boundaries Data Theme.

Attachments

<u>Document ID</u>	<u>Type</u>	<u>Description</u>
BAS-1L	Letter	Annual Response Letter, will be sent to the BAS contact with the Annual Response Form.
BAS-2L	Letter	Annual Response Letter, will be sent to the American Indian Area (AIA) BAS contact with the Annual Response Form.
BAS-3L	Letter	CBAS letter, will be sent to all local governments that are part of either a county or state consolidation agreement. Annual Response Form is not included

<u>Document ID</u>	<u>Type</u>	<u>Description</u>
BAS-4I	Insert	because response will come from the agency named in the agreement. They can report HEO updates online or in email to geo.bas@census.gov. BAS Response Methods Insert. This is printed on the back side of the Annual Response Form.
BAS-5I	Insert	BAS Response Methods and Materials Insert. This is included with the regular BAS package.
BAS-8L	Letter	Consolidated County Package Letter, this is sent to counties in a consolidation agreement.
BAS-9L	Letter	County Package Letter with BAS Survey Form 2, will be sent to the BAS contact unless one has not been identified, when it will go to the HEO. This letter will be sent to counties who respond to the Annual Response indicating they want a BAS package.
BAS-10L	Letter	Incorporated Place and Minor Civil Division Package Letter with BAS Survey Form 3, will be sent to the BAS contact unless one has not been identified, when it will go to HEO. This letter will be sent to places and MCDs who respond to the Annual Response indicating they want a BAS package.
BAS-11L	Letter	AIA Package Letter with BAS Survey Form 5, will be sent to BAS AIA contact unless one has not been identified, when it will go to Tribal Chair. This letter will be sent to AIAs who respond to the Annual Response indicating they want a BAS package.

<u>Document ID</u>	<u>Type</u>	<u>Description</u>
BAS-12PC	Postcard	No Change Post Card is included in the BAS package, this is used for counties, places, MCDs and AIAs to provide a quick response of no change.
BAS-13L	Letter	Announcement for the BAS Workshops Letter , sent to HEO/TC/BAS contacts to inform them about workshops.
BASSC-1	Letter	State Certification Letter, sent to the local government, includes details of data reported to the Census Bureau, but not to the State.
BASSC-2	Letter	State Certification Letter, sent to the local government, includes details of data reported to the state, but not to the Census Bureau.
BASSC-3	Letter	State Certification Letter to the State Certifying Official to describe process and schedule.
BASSC-4	Letter	State Certification Letter, sent to the Governor to designate a State Certifying Official.
Georgia-Insert	Insert	Georgia Insert – information about the Georgia Department of Community Affairs’ role in the BAS process.
BAS-14I	Insert	Indiana Insert – Describes a special situation in Indiana where counties report for their MCDs.
BAS1 Survey	Form	Boundary and Annexation Survey –

<u>Document ID</u>	<u>Type</u>	<u>Description</u>
BAS2 Survey	Form	Place Form Boundary and Annexation Survey – County Form
BAS3 Survey	Form	Boundary and Annexation Survey – MCD Form
BAS4 Survey	Form	Boundary and Annexation Survey – New Incorporation Form
BAS5 Survey	Form	Boundary and Annexation Survey – AIA Form
BAS6 Survey	Form	Boundary and Annexation Survey – Consolidated BAS
BAS-ARF Survey	Form	Boundary and Annexation Survey – Annual Response Form
RG_DIGITALBAS_LOCAL This	Guide	“Boundary and Annexation Survey Respondent Guide: Digital BAS.” guide gives detailed instructions for (non-tribal) digital BAS participants.
RG_DIGITALBAS_TRIBAL	Guide	“Boundary and Annexation Survey Tribal Respondent Guide: Digital BAS.” This guide gives detailed instructions for tribal digital BAS participants.
RG_PAPER	Guide	“Boundary and Annexation Survey (BAS) Paper Respondent Guide.” This guide gives detailed instructions for paper BAS participants.
RG_MTPS	Guide	“Boundary and Annexation Survey Respondent Guide: MAF/TIGER Partnership Software.” This guide gives detailed instructions for MTPS BAS participants.
STATECERTIFICATION_RG	Guide	“Boundary and Annexation Survey Respondent Guide: State Certification.”

This guide provides detailed instructions for State Certification participants.