**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. Section 193 provides for the collection of preliminary and supplementary statistics as related to the main topic of the Census. This information request covers the questionnaire needed to conduct the directory survey component of the 2017 Census of Governments. The 2016 Government Units Survey (GUS) (Attachment A) will be used to update the universe list of public sector entities for the 2017 Census of Governments. Each of the estimated 77,000 non-school governments will be sent a questionnaire. Respondents will be encouraged to respond to the survey on the Internet but will have the option to answer the questions and return the questionnaire by paper mail. Respondents will be asked to verify or correct the name and mailing address of the government and answer five questions to complete the survey.

The GUS is mailed to all municipalities, townships, counties, and special districts. The 2011 GUS, conducted in advance of the 2012 Census of Governments, consisted 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 2016 GUS will differ from the former version by shortening the number of content areas. The 2016 GUS consists of only two broad content areas: background and employee information. Both the 2011 and 2016 GUS also include(d) both remarks and contact information sections. The first content area for the 2016 GUS consists predominately of yes/no questions and is designed to determine the existence of a government. The employees section of the questionnaire requests the number of paid employees of a government. A notice published in the Federal Register on April 1, 2015 stated our intent to ask respondents detailed questions on defined-contribution plans, defined-benefit and post-employment healthcare plans. However, we will not be asking these questions for this collection.

1. **Needs and Uses**

The GUS serves multiple purposes. The GUS will be used 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 Census Bureau; to identify file duplicates and units that were dependent on other governments; to update and verify the mailing addresses of governments; and to produce the official count of non-school government units in the United States.

Information quality is an integral part of the pre-dissemination review of the information the Census Bureau disseminates (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.

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. The Bureau of Economic Analysis (BEA) uses the products of the Census of Governments including the counts of state and local governments; and state and local government employment and payroll data. BEA also uses revenue, expenditures, debt, and financial assets data from the Census of Governments for principal inputs to the local government portion of their Gross Domestic Product publication. 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.

1. **Use of Information Technology**

The Census Bureau is using information technology to reduce respondent burden in the following ways:

1. **Electronic Submissions**

The GUS can be completed on the Internet. Instructions for reporting on the Internet are included in the initial mailing as well as the follow-up mailing. The initial mailing to respondents who have never reported electronically to the GUS, Census of Governments, or any of our annual surveys will also include a Centurion electronic reporting flyer (Attachment B). We have historical records on whether or not respondents have replied electronically to determine which respondents will receive a flyer.

We estimate that approximately 50% of respondents will utilize the Census Bureau’s web instrument to respond electronically. This calculation is an estimate based on the 2011 GUS, 2012 Census of Governments, the 2013 and 2014 Annual Survey of Public Employment and Payroll, and the 2013 and 2014 Annual Survey of Public Pensions.

1. **Processing technology**

The GUS will employ automated check-in procedures for forms returned by mail which include imprinting unit ID barcodes on the questionnaire, scanning barcodes on returned forms, and using associated software to generate check-in files and follow up mail files. The automated tracking system generates and distributes a daily activity report. The GUS will also use dashboards to guide the non-response follow up process.

Data entry for all GUS questionnaires returned by mail will utilize the Census Bureau’s iCADE keying program, which also uses an optical character recognition (OCR) system to capture data on the forms. Imaging of the forms, which will be a new process for the 2016 GUS, is expected to reduce the number of hours previously required to sort and file paper forms upon receipt and to retrieve them for analyst use. Using the Feith Image Retrieval system, analysts have immediate access to the form images on their desktop computer. The processing changes are expected to increase the survey efficiency and reduced costs.

1. **Efforts to Identify Duplication**

The GUS 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.

1. **Minimizing Burden**

The GUS asks mainly a series of yes/no questions in an effort to reduce the overall burden the data collection imposes on respondents. Additionally, the number of questions asked for the 2016 GUS is drastically reduced from the 2011 GUS (see Necessity of the Information Collection section for further detail), resulting in a much lower estimate of hour burden. A burden estimate was initially determined from the Cognitive Expert Review (Attachment G). However, this estimate was further reduced after we removed five questions from the 2016 GUS questionnaire after the expert review report was prepared. After several discussions, we concluded that information for these five questions could be collected later.

Census Bureau staff provide assistance to governments that express difficulty in completing the questionnaire.

1. **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.

1. **Special Circumstances**

There are no special circumstances.

1. **Consultations Outside the Agency**

The notice inviting the public to comment on plans to submit this request was published in the Federal Register (Vol. 80 No. 62) on April 1, 2015 on page 17408- 17409 (two pages). No comments from the public were received when the comment period closed on June 1, 2015.

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 BEA, a data user of both the Census of Governments and sample data products, occurs annually, typically at the beginning of the calendar year. Analysts at BEA in past 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.

1. **Paying Respondents**

The Census Bureau will not pay respondents for providing their data nor issue gifts. The respondents are local government public officials who provide information on a voluntary basis.

1. **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(b) 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 requesting their cooperation, this letter will include a statement informing respondents that the survey is voluntary and exempt from the rules of confidentiality. The 2016 Director’s letter is included in Attachment D. The Centurion instrument will also include statements regarding the voluntary nature of this survey and the data’s exemption from the rules of confidentiality.

1. **Justification for Sensitive Questions**

No questions of a sensitive nature are asked.

1. **Estimate of Hour Burden**

The GUS is conducted every five years. There are approximately 77,000 local non-school government unit respondents. We based the work hours per response on the expert review conducted in preparation for the GUS. This is a national questionnaire 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 15 minutes.

The GUS respondent burden is as follows:

Respondent Burden Hours

a. Number of respondents 77,000

b. Reports annually per respondent 1

c. Total respondents 77,000

d. Estimated work hours per response 0.25

e. Estimated respondent burden hours 19,250

1. **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.

1. **Cost to Federal Government**

The estimated cost for the GUS is projected to be $5 million over the lifecycle of this survey.

1. **Reason for Change in Burden**

The decrease in burden since this collection was last conducted is due to a decrease in the number of questions.

1. **Project Schedule**

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| --- | --- | --- |
|  | **Start Date** | **Finish Date** |
| **Data Collection** | February 2016 | September 2016 |
| **Data Processing** | March 2016 | January 2017 |
| **Product Releases** | March 2017 | May 2017 |

1. **Request to Not Display Expiration Date**

The OMB expiration date will be displayed on the survey form and Centurion instrument.

1. **Exceptions to Certification**

There are no exceptions to the certification statement.