

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

Part A – Justification

Question 1. Necessity of the Information Collection

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

The authority for conducting activities in this document comes from Title 13, U.S.C., Section 6.

The BAS updates municipal, Minor Civil Divisions (MCDs), counties, American Indian Areas (AIAs), and Alaska Native Regional Corporations (ANRCs) inventory for compliance with responsibilities specified in the Office of Management and Budget (OMB) Circular A-16, Governmental Units and Administrative and Statistical Boundaries Data Theme. BAS supports the spatial data steward responsibilities of the OMB E-Gov, Data.gov, The National Map, and updates to the Geographic Names Information Systems (GNIS). The results of the BAS are needed to provide information documenting the creation of newly incorporated municipalities, MCDs, counties, federally recognized AIAs, (including American Indian Reservations (AIRs), Off-Reservation Trust Lands (ORTLs), and ANRCs). BAS also includes the dissolution of incorporated municipalities and MCDs, and changes in the boundaries of municipalities, MCDs, counties, AIAs, and ANRCs. BAS information provides an appropriate record for reporting the results of the Decennial and Economic censuses, including surveys such as the American Community Survey (ACS) and Population Estimates Program (PEP).

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 AIRs, ORTLs, 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, legally defined MCDs, and legally defined federally recognized American Indian and Alaska Native areas (including ANRCs). 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 fewer 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, MCDs 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 MCDs 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 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.

In the years ending in 6 through 9, state participants in the Redistricting Data Program (RDP) may request coordination between the BAS and RDP submissions for the Block Boundary Suggestion Project (BBSP) and Voting District Project (VTDP). The alignment of the BAS with the BBSP and VTDP will facilitate increased cooperation between state and local governments and provide the opportunity to align their effort with updates from state and local government officials participating in the BAS.

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 not follow up with governments with no changes to minimize unnecessary burden.

The final stage is the State Certification program, which allows state level agencies to verify that the status and boundary updates received through the 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, 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.

To improve boundary quality in the Census Bureau's Master Address File/Topologically Integrated Geographic Encoding and Referencing (MAF/TIGER) System, the Census Bureau is introducing the Boundary Quality Assessment Reconciliation Project (BQARP), based upon the

findings of the Cadastral Pilot conducted under the previous BAS clearance. BQARP is a project to assess, analyze, and improve the spatial quality of legal and administrative boundaries within MAF/TIGER. Ensuring quality boundaries is a critical component of the geographic preparations for the 2020 Census and the Census Bureau's ongoing Geographic Partnership Programs (GPPs) and surveys. In addition, the improvement of boundary quality is an essential element of the Census Bureau's commitment as the responsible agency for legal boundaries under the OMB Circular A-16. The goal of BQARP is to establish a new, accurate baseline for boundaries within an entire state or county, while the BAS would continue the collection of annexations and deannexations on a transaction basis as they occur over time. The estimated work burden for participation is 25 hours per participant.

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 Federal Information Processing Standards (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 of 1995.

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. Beginning in FY 2016, our digital partners may submit BAS updates via the Geographic Update Partnership Software (GUPS). GUPS is free to all participants wishing to participate digitally and replaces the MAF/TIGER Partnership Software (MTPS). GUPS is a specifically designed boundary, feature, and address update tool that is accessible by all partners, regardless of their GIS experience or access to the internet. GUPS will reduce burden and paper costs for the Census Bureau and decrease usage of paper maps for GPPs.

The Internet also plays a significant role in providing the public access to Census Bureau boundary data. GUPS, along with its accompanying spatial data files, is 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 released an easy-to-use web mapping service, TIGERweb, enabling participants to compare and view their boundaries in relationship to other geographic areas and imagery. Geography Division (GEO) will also conduct BAS workshops online to reduce burden and to provide an opportunity for respondents to ask questions about the survey.

BAS partners have opportunities to respond to the survey electronically. GEO estimates that approximately 50 percent of the reporting universe partners who respond will do so electronically, based on our previous experience with this program. Approximately 50 percent of partners who have requested materials have requested paper, while the other 50 percent have requested digital materials. GEO will continue to track these rates for planning purposes, as they have impacts on staffing levels for completing the program. A partner may report a “no change” response through 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, Secure Web Incoming Module (SWIM), or by mailing us CD/DVD media.

Question 4. Efforts to Identify Duplication

Boundary data can be obtained and updated from state, local, and tribal governments. However, the Census Bureau is the designated federal agency through OMB Circular A-16. 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 changes so that the BAS only targets 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 (CBAS) program. The Census Bureau offers consolidation agreements to counties that are interested in submitting boundary changes for the legal governments (incorporated places and MCDs) 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, MCDs (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

BAS must continue in order to support the 2020 Census and GPPs. Conducting the survey less frequently would greatly reduce the efficiency of preparing for the Decennial and Economic Censuses, surveys, the on-going ACS, and the annual PEP. In addition, it would disrupt the flow of information to the agencies that use this information in administering their programs. 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 OMB when conducting the survey.

Question 8: Consultations Outside the Agency

The purpose, methodology, and problems of the BAS are discussed with state, county, 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 maps are discussed 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 2015.

<p>Jefferson County, WV Todd Fagan GIS Director 116 E Washington St. Suite 201 Charles Town, WV 25414 304-724-6759 tfagan@jeffersoncountywv.org</p>	<p>State of Kentucky Kandie Adkinson Administrative Supervisor 702 Capital Ave. Frankfort, KY 40601 502-782-7408 kandie.adkinson@ky.gov</p>
<p>State of Alaska Eddie Hunsinger State Demographer Alaska Department of Labor and Workforce Development, Research and Analysis Section P.O. Box 115501 Juneau, AK 99811 907-269-4960 eddie.hunsinger@alaska.gov</p>	<p>Fairview Industries Nancy Von Meyer P.O. Box 100 Pendleton, SC 29670 864-646-2755 nancy@fairview-industries.com</p>
<p>Brown County, WI Jeff DuMez GIS Coordinator 305 E Walnut St. Green Bay, WI 54301 920-448-6480 dumez_jd@co.brown.wi.us</p>	<p>Lake County, FL Sue Carroll GIS Project Coordinator 315 W Main St. Tavares, FL 32778 352-343-9794 scarroll@lakecountyfl.gov</p>
<p>Buckeye, AZ Anthony Renaud GIS Administrator 1101 E Ash Ave. Buckeye, AZ 85326 623-349-6552 arenaud@buckeyeaz.gov</p>	<p>Columbus, OH Marc Cerana GIS Analyst 50 W Gay St. Columbus, OH 43215 614-645-0662 mpcerana@columbus.gov</p>
<p>Columbia, SC Swinton Hudson III Information Resource Coordinator 1136 Washington St. Columbia, SC 29201 803-545-0100 swhudson@columbiasc.net</p>	<p>Lane County, OR Bill Clingman Senior GIS Analyst 859 Willamette St. Suite 500 Eugene, OR 97401 541-682-4548 bclingman@lcog.org</p>

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

The Federal Register Notice announcement publication date was August 26, 2015 (80 FR pp. 51766-51768). No comments were received during the consideration period ending October 26, 2015.

Question 9. Paying Respondents

GEO does not pay respondents or provide them with gifts for responding to this survey.

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

GEO based the estimated hour burden using the 2013 and 2015 BAS. Burden hours vary for each year, thus GEO is providing the maximum burden. The projected number of respondents and the estimated burden for the 2016 through 2018 surveys are the following:

	Estimated Number of Respondents:	Estimated Time per Response (in hours)	Estimated Total Hour Burden:
Annual Response Notification:	39,400	0.5	19,700
No Change Response	25,000	4	100,000
Reporting Universe Telephone Follow-up	14,000	0.5	7,000
Packages with Changes	5,000	8	40,000
State Certification Review	49	10	490
State Certification Local Review	1,000	2	2,000
Boundary Quality Assessment Reconciliation Project	16	25	400
Redistricting Data Program State Reconciliation	50	20	1,000
Redistricting Data Program Local Reconciliation	2,000	2	4,000
TOTAL	86,515		174,590

Estimated Total Annual Cost to Public: \$4,928,569.10

Question 13. Estimated Cost Burden

Hourly wage of \$28.21 calculated via U.S. Bureau of Labor Statistics average of five common position types that respond to BAS. Positions include Geographer, Urban/Regional Planner, Cartographer/Photogrammetrist, Surveyor, and Surveying/Mapping Technician.

Question 14. Cost to Federal Government

The estimate to conduct the BAS with a partial universe is approximately \$8,000,000 and \$16,000,000 for a full universe. The Census Bureau anticipates a partial universe in 2016 and a full universe in 2017 and 2018. This includes costs for the Census Bureau's National Processing

Center (NPC), Regional Offices, and Headquarters. The Spatial Data Collection and Products Branch (SDCPB) and the Geographic Programs Budget Branch (GPBB), within GEO, 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 increase in burden hours from the current OMB approval is due to RDP reconciliation, and BQARP.

Question 16. Project Schedule for Each Survey Year

Month/ Milestone	Activity
October	Create BAS partnership shapefiles and maps in PDF format for internet posting. Start posting data on the BAS homepage. Start staging/preparing mail-out of BAS materials.
November	Create BAS letter and forms in electronic format for internet posting and on-demand printing. Complete posting of BAS materials on the BAS homepage. Complete staging/preparing mail-out of BAS materials. Send discrepancy letters to governments the SCO identified as having data issues.
December	Annual response conducted by e-mail for all governments. Start BAS workshops. Start receiving e-mail notifications to request materials to mail to participants. Participants start downloading materials digitally for review and submission. Mail-out of BAS packages begins. Start receiving no change notifications from participants. Start receiving BAS returns and start pre-processing. Send State Certification Letter to Governor to designate SCO.
January	Continue BAS workshops. Start non-response follow-up to annual response telephone calls for the reporting universe of governments. Processing and Verification of BAS returns begin for legal changes with an effective date of January 1 st of current survey year.
February	Finish BAS workshops. Start updating MAF/TIGER and Quality Control (QC) review for legal changes with an effective date of January 1 st of current survey year. Invite the State Data Centers to participate with telephone follow-up for BAS and response status of participation for BAS reporting universe.
March 1st	Deadline for governments to return BAS package for inclusion in the ACS and PEP product delivery.
March	The State Data Centers participate in telephone follow-up for BAS reporting universe.
March 30th	BAS required to reach 40% response rate for reporting universe.
April	Complete Processing and Verification of BAS returns for legal changes with an effective date of January 1 st of current survey year.

May	Complete updates into MAF/TIGER and QC 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 starts for packages returned after March 1 st .
May 31st	Deadline for governments to return BAS package for inclusion in the following BAS year materials and other Census Bureau products inclusion of all boundary updates with an effect date of January 1 st of the next survey year as well as all other types of updates submitted (feature, landmarks, etc.)
June 1st	State Certification completion deadline.
June	Start review of all stages of product creation for the ACS and PEP.
June 30th	BAS required to reach 80% response rate for reporting universe.
July	Updates into MAF/TIGER and QC review begin 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 of all stages of product creation for the ACS and PEP.
August	Review and QC BAS products for the participants (letters, forms, maps, shapefiles, etc.). Complete updates into MAF/TIGER and QC review. Final QC of all updates by Headquarters before releasing to product creation. Start review of all stages of product creation for the BAS.
September 1st	Complete processing and update of State Certification returns.
September	Prepare for BAS annual response. Complete review of all stages of product creation for the BAS for spatial product datasets only.
September 30th	BAS required to reach 85% response rate for reporting universe.
All Year	Write requirements and procedures. Process data. Respond to participants through e-mail and phone. Provide training of staff and participants. Attend conferences. Develop Production Control System (PCS). Identify efficient methods to implement and process BAS.

Question 17. Request to Not Display Expiration Date

GEO will display the assigned expiration date of this information collection on the BAS forms.

Question 18. Exception to the Certification

There are no exceptions.

Attachments

ID	Description
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Letters/Inserts/Flyers	
BAS 1L	Annual Response Letter: Annual Response Form link, sent to the BAS contact.
BAS 2L	Annual Response Letter: AIA with Annual Response Form link, sent to the AIA BAS contact.
BAS 3L	Annual Response Letter: CBAS sent to all local governments that are part of either a county or state consolidation agreement. Annual Response Form link is not included because response will come from the agency named in the agreement. They can report Highest Elected Official (HEO) updates online or in an e-mail to geo.bas@census.gov .
BAS 4L	Annual Response Letter: Not currently CBAS, sent to local governments where the county has an agreement and they are currently not part of that agreement.
BAS 5L	Annual Response Letter: CBAS partial, sent to local governments where the entity is in more than one county but not all of their counties are in an agreement.
BAS 9L	BAS Package Letter sent to entities requesting maps.
BAS 4I	BAS Response Methods Insert is included and explains response methods.
BAS 14I	Indiana Insert: Indiana specific information.
BAS 15I	Georgia Insert: Georgia Department of Community Affairs information.
BAS Tribal Flyer	Tribal Flyer: Tribal informational flyer.
BAS Flyer	BAS Flyer: BAS informational flyer.
Forms	
BAS Annual Response Form	Annual Response Form: Mailed to entities that do not have an e-mail address.
BAS 1	Place Form
BAS 2	County Form
BAS 3	MCD Form
BAS 5	AIA Form
BAS 6	Consolidated BAS
E-mail Templates	
BAS 1L	Non-Tribal Entities : E-mail text version of BAS 1L letter.
BAS 1L Georgia	Georgia Entities: E-mail text version of BAS 1L letter with Georgia insert information.
BAS 1L Indiana County/Place	Indiana Counties/Places: E-mail text version of BAS 1L letter with Indiana insert BAS 14I information.
BAS 2L	Tribal Entities: E-mail text version of BAS 2L letter.
BAS 3L	Partnership Entities: E-mail text version of BAS 3L letter.
BAS 3L Indiana MCDs	Indiana MCDs: E-mail text version of BAS 3L letter with Indiana insert information.
BAS 4L	Entities whose county is in a consolidated agreement but they are not: E-mail text version of BAS 4L letter.

BAS 5L	Entities in more than one county and not all of their counties are in an agreement: E-mail text version of BAS 5L letter.
BAS HEO/TC Courtesy Copy	HEO/TC courtesy copy: E-mail text version that contains information from BAS letters.
BAS Yes Change Response	Entities that reply to Annual Response with yes boundary changes will get this e-mail: It will include submission information.
BAS Yes Change Response Token	Entities that reply to Annual Response with yes boundary changes, that need a SWIM token, will get this e-mail: It will only include the SWIM Token.
BAS Webinar	Non-partnership entities: E-mail template with webinar information.
Videos	
BAS Geographic Concepts	http://www.census.gov/geo/partnerships/bas/videos/geo_concepts.html
Introduction to BAS	http://www.census.gov/geo/partnerships/bas/videos/introbas.html
Introduction to Tribal BAS	http://www.census.gov/geo/partnerships/bas/videos/introtribalbas.html
Introduction to Digital BAS	http://www.census.gov/geo/partnerships/bas/videos/introdigitalbas.html
Digital Processing and Topology	http://www.census.gov/geo/partnerships/bas/videos/digitalproctopo.html
Digital BAS Demonstration	http://www.census.gov/geo/partnerships/bas/videos/digitalbasdemo.html
Respondent Guides	
BAS Paper	BAS Respondent Guide Paper: Places, Counties, MCDs, and AIAs.
BAS Digital Non-Tribal	BAS Respondent Guide Digital: Places, Counties, and MCDs.
BAS Digital Tribal	BAS Respondent Guide Digital: AIAs.
BAS GUPS	BAS Respondent Guide: Geographic Update Partnership Software (GUPS).
BAS GUPS	BAS Quick Reference Guide: GUPS.
Telephone Scripts	
BAS Script	Telephone script for incoming calls to the BAS Unit at the NPC to answer frequently asked questions.
Reports	
BAS Cadastral Pilot	Cadastral Pilot report findings for justification to initiate BQARP.
State Certification	
BASSC 1L	State Certification Letter to the Local: Includes details of discrepancies of changes reversed between state and census data.
BASSC 2L	State Certification Letter to the Local: Includes details of discrepancies of changes not reported to the Census Bureau between state and census data.

BASSC 3L	State Certification Letter to the Governor: Asks Governor to designate a SCO.
BASSC 4L	State Certification Letter to the State Certifying Official: Describes process and schedule.
BASSC Form	SCO Sign-Up Form
BASSC Guide	State Certification Respondent Guide