

**Department of Commerce
United States Census Bureau
OMB Information Collection Request
Redistricting Data Program
OMB Control No. 0607-0988**

Part A – Justification

Question 1. Necessity of the Information Collection

The U.S. Census Bureau is requesting a clearance to continue the Redistricting Data Program Operation (RDP). As the current Office of Management and Budget (OMB) Control Number 0607-0988 will expire in November 2018, the new clearance will allow the Census Bureau to provide RDP specific materials and procedures to participants during the Fiscal Years (FY) 2019, 2020, and 2021. Liaisons from the 50 states, the District of Columbia, and Puerto Rico will be updating and verifying the boundaries of their voting districts during the implementation of Phase 2 of the RDP, the Voting District Data Project (VTDP).

The authority for conducting activities in this document comes from Title 13 U.S.C., Sections 16, 141, and 193.

The 2020 Census RDP is established in accordance with the provisions of Title 13, United States Code (U.S.C.), Section 141(c). Public Law 94-171 requires the Census Bureau to supply the 50 states the small geographic areas for which they wish to receive decennial census population totals for the purpose of redistricting. The law also requires that by April 1 of the year following the decennial census, the Secretary of Commerce will furnish state officials or their designee(s) with population counts for standard census tabulation areas (e.g. counties, cities, census blocks, and Congressional districts) and if provided by the states, legislative districts and voting districts. The program is also offered to the District of Columbia and the Commonwealth of Puerto Rico. The benefits to participation in RDP for the 50 states, the District of Columbia, and the Commonwealth of Puerto Rico are that they will receive tabulations for the small area geographies they have identified that will assist with conducting their legislative and congressional redistricting.

The Census Bureau has broken the RDP into five phases:

Phase 1: Block Boundary Suggestion Project (BBSP)

The Census Bureau conducted the BBSP between 2015 and 2017. The purpose of the BBSP was to afford states the opportunity to identify non-standard features often used as electoral boundaries. State liaisons provided suggestions for 2020 Census tabulation block boundaries, which will result in more meaningful block data for the state. Liaisons worked with local officials, including county election officers and others, to ensure local geography is represented in the 2020 Census tabulation block inventory. In addition, the liaison, on behalf of the state,

made suggestions for features not desirable as census tabulation blocks, which may reduce the overall number of census tabulation blocks from the 2010 Census inventory. Participating states received guidelines and training for providing their suggestions for the 2020 Census tabulation blocks for consideration in the final 2020 Census tabulation block inventory. For the first time, states had the opportunity to review legal limits, such as county and incorporated place boundaries, as reported through the Boundary and Annexation Survey (BAS). The Census Bureau conducts the BAS annually to update information about the legal boundaries and names of all governmental units. The alignment of the BAS with the BBSP facilitated the cooperation between state and local governments. A verification phase occurred from January 2017 through May 2017. The BBSP's hour burden is not included in this OMB package.

Phase 2: Voting District Project (VTDP)

The Census Bureau conducts the delineation of voting districts (VTDs) between January and May 2018. Through the VTDP, state liaisons, on behalf of their states, have the opportunity to delineate and submit the voting districts (a generic term used to represent areas that administer elections such as precincts, election districts, wards, etc.) to the Census Bureau for representation in the 2020 Census.

In January 2018, the Census Bureau provided the program liaisons with the materials necessary to participate in the program. These materials included the Geographic Update Partnership Software (GUPS), the VTDP GUPS User Participant Guide, the VTDP User Supplied Geographic Information Systems (GIS) Participant Guide, and the geographic files from the Master Address File/Topologically Integrated Geographic Encoding and Referencing system (MAF/TIGER). Following the delineation, states that participated will be able to verify the boundary updates in early FY 2019 and 2020.

The Census Bureau performs two rounds of verification in order to provide current VTDs to the states that align better with decennial census geography:

1. From December 2018 through May 2019, states that participated in the initial delineation are able to verify their VTDs. The estimated work burden for participation in the initial verification is 124 hours per participant.
2. From December 2019 through March 2020, states that participated in the initial delineation and the first verification will have a second opportunity to verify their VTD submission. The estimated work burden for the second verification is 93 hours per participant.

The burden for the verification sessions is included in the OMB package 2019-2021, but the delineation's hour burden is not, as this activity is covered in the OMB package 2016-2018. VTDP verification will start in December 2018 upon approval of the extension of the currently approved OMB collection. Participants will only incur hour burden during the VTDP verification (rounds one and two) in early 2019 and 2020.

Phase 3: Delivery of the 2020 Decennial Census Redistricting Data

By April 1, 2021, the Director of the Census Bureau, in accordance with Title 13, U.S.C., Sections 16, 141, and 193, will furnish the Governor and state legislative leaders, both the majority and minority, with 2020 Census population counts for standard census tabulation areas, regardless of a state's participation in Phase 1 or 2. Tabulation areas include states, Congressional districts, state legislative districts, American Indian areas, counties, cities, towns, census tracts, census block groups, and census blocks. The Director of the Census Bureau will provide 2020 Census population counts for those states participating in Phase 2, for both the standard tabulation areas and for VTDs. For each state, this delivery will occur no later than April 1, 2021. Participants will not incur any hour burden during Phase 3.

Phase 4: Collection of Post-Census Redistricting Data Plans

The Census Bureau requests from every state the newly drawn legislative and congressional district plans and prepares appropriate data sets based on new districts. Between the 2010 Census and the 2020 Census, the effort began in 2011 using the 2010 Census as a baseline. However, beginning in 2021, the Census Bureau will use the 2020 Census as a baseline. This effort will occur every two years in advance of the 2030 Census in order to update these boundaries with new or changed plans. A verification phase will occur with each update. Participants will not incur any hour burden for this phase in 2019 through 2021.

Phase 5: Review of the 2020 Census RDP and Recommendations for the 2030 Census RDP

As the final phase of the 2020 Census RDP, the Census Bureau will work with the states to conduct a thorough review of the RDP. The intent of this review, and the final report that results, is to provide guidance to the Secretary of Commerce and the Census Bureau Director in planning the 2030 Census RDP. Participants will not incur any hour burden for this phase in 2019 through 2021.

Question 2. Needs and Uses

All activities described above directly support the Census Bureau's efforts to comply with Public Law 94-171 by allowing the states to identify the small area tabulations they need for legislative redistricting and by supplying them with that data in a timely manner. In addition, these activities assist in maintaining the MAF/TIGER system, in partnership with tribal, state, and local governments nationwide. Because tribal, state, and local governments have current knowledge of, and data about, where housing growth and change are occurring in their jurisdictions, their input into the overall development of geographic data for the Census Bureau makes a vital contribution to MAF/TIGER. Similarly, those governments are in the best position to work with local geographic boundaries, and they benefit from accurate address and geographic data.

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 GIS and web services to lessen the burden. The Census Bureau provides the GUPS free of charge for all RDP participants to participate digitally. The GUPS is a specifically designed boundary and feature update tool that guides RDP 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 public access to Census Bureau boundary data. The GUPS, along with its accompanying spatial data files, is available for download from the Census Bureau's RDP internet site. The Census Bureau also provides the GUPS software and RDP materials to state participants on DVD. State RDP partners also provide their responses electronically. A state partner may report a "no change" response through email. In addition, a partner must send in their boundary and data updates electronically through the Secure Web Incoming Module (SWIM)

Question 4. Efforts to Identify Duplication

The Census Bureau is the designated federal agency steward for the Governmental Units and Administrative and Statistical Boundaries Data Theme 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 provides the program software and spatial files to participants. The Census Bureau provides the GUPS software for use by state participants during the RDP phases.

The Census Bureau also offers states participating in the Boundary Quality Assessment and Reconciliation Project and BAS the opportunity to report legal boundary updates along with their feature changes in order to reduce the burden on local governments and avoid the duplication of effort.

Question 6. Consequences of Less Frequent Collection

The RDP must continue to complete all five phases needed to meet the mandate and for the Director of the Census Bureau to provide population totals to state officials by April 1, 2021.

Question 7: Special Circumstances

Data collection for RDP follows the guidelines of OMB. There are no special circumstances for this data collection.

Question 8: Consultations Outside the Agency

The Census Bureau conducted redistricting kick-off meetings in the states by request. The Census Bureau also discussed the purpose, methodology, and challenges of the RDP with state and local officials, plus a network of frequent users of Census Bureau data during periodical national and local meetings including the annual National Conference of State Legislators (NCSL) annual legislative summits. These meetings explain the RDP, the design of the 2020 Geographic Programs, and the current and expected field activities. Discrepancies in maps are periodically discussed with state and local officials during problem resolution. As stakeholders in the accuracy of boundary information and the resulting funding allocations, state respondents are cooperative and willing to provide RDP information. The following is a representative sample of the individuals we have consulted with during the RDP.

Ms. Wendy Underhill Program Director—Elections and Redistricting National Conference of State Legislatures 7700 E. First Place Denver, CO 80230 303-856-1379 wendy.underhill@ncsl.org	Ms. Karin MacDonald Director - Statewide Database University of Berkeley Elections Administration Research Center 2850 Telegraph Avenue, Suite 500 Berkeley, CA 94705 510-642-9086 karin@cain.berkeley.edu
Mr. Jerry Howe Managing Policy Analyst Office of Legislative Research and General Counsel Utah State Capitol Complex House Building - Suite W210 350 North State Salt Lake City, UT 84114-5210 801-538-1032 jdhowe@le.utah.gov	Ms. Gina Wright Executive Director Legislative & Congressional Reapportionment Coverdell Legislative Building Suite 407 18 Capitol Square, SW Atlanta, GA 30334 404-656-5063 gina.wright@legis.ga.gov
Mr. Clark Bensen President- Polidata Inc. 3112 Cave Court Lake Ridge, VA 22193 703-690-4066 clark@polidata.org	Mr. Kimball Brace President - Election Data Services 6171 Emerywood Court Manassas, VA 20112-3078 202-607-5857 KBrace@electiondataservices.com

During conversations with these individuals, comments were favorable concerning the RDP. In addition, the public had the opportunity to review and submit comments on RDP during the 60-Day Notice of the Proposed Information Collection. The notice for public comment, titled “Redistricting Data Program,” was published in the *Federal Register* March 1, 2018 (Vol 83., No. 41, pp. 8832-8835). The Census Bureau received two comments during the 60-day period. The first commenter asked for clarification on how the RDP works and if redistricting impacts voting districts. The Census Bureau addressed the comment by explaining in detail that the Census Bureau's Redistricting Data Program does not impact voting district boundaries. Phase 2 - Voting District Project (VTDP) is simply collecting the voting district (precinct, ward) boundaries that already exist in the state and are used by the state to conduct elections. The Census Bureau does not dictate in any way where those boundaries should be. The Census Bureau collects those boundaries as they already exist in the state so that we will be able to tabulate 2020 Census data (population and housing counts) for each voting district for which the state provides boundaries.

After the 2020 Census, states will draw the boundaries for their new congressional and state legislative districts. While states will use 2020 data tabulated for census blocks, voting districts and possibly other geographic areas such as cities, counties, etc., as considerations when they draw their congressional and legislative district boundaries, the Census Bureau has no influence over where the state chooses to draw those boundaries and how. That is strictly a state function. There is a brief summary available in the 30-day notice, section Needs and Uses, page 3, first paragraph.

The second commenter asked for clarification on how the Census Bureau conduct data collection and geographic updates in the Island Areas, in particular the Commonwealth of the Northern Mariana Islands (CNMI). The Census Bureau addressed the comments by explaining in details how geography and geographic updates in the Island Areas (American Samoa, Guam, CNMI, and the U.S. Virgin Islands) are conducted somewhat differently than in the rest of the United States, including Puerto Rico. Stateside, data collection activities associated with the Redistricting Data Program involve collecting geographic boundaries for voting districts (e.g. voting precincts, wards, etc.) and collecting suggestions for tabulation block boundaries. Both of these activities occur in the four years leading up to the decennial census. Review and updates of other geographies, such as incorporated places, counties, census tracts and others, for the 50 states the District of Columbia, and Puerto Rico, are conducted through a number of different geographic update programs such as the Boundary and Annexation Survey and the Participant Statistical Areas Program. These programs occur on a variety of schedules.

A review of the geography and any updates to the geography of the Island Areas is done once a decade in the two to three years leading up to each decennial census. All geography, including roads and geographic areas, are reviewed and updated together, rather than having various separate programs as is done for the rest of the U.S. Geographic area updates in the Island Areas has been done using this approach for a number of reasons including:

1. The size of the workload for the Island Areas makes this a practical and viable option.
2. There is a single participant in each Island Area for all of the different geographic updates.

3. The stability of the geography in the Island Areas does not require annual updates.
4. The addressing systems in the Island Areas do not allow full utilization of the frequent address updates from the U.S. Postal Service.
5. The management and funding of the field operations is separate from the rest of the U.S.
6. The infrequent tabulation and publication of the statistical data for the Island Areas does not necessitate more frequent updates to the geography.

During the review of the Island Area geographies, the Census Bureau works with Island Area officials to determine what types of geographies will be most useful to them for data collection and tabulation. During the discussions between the Census Bureau and the Island Area officials for the 2020 Census, voting district boundaries were not identified as a geography officials wished to collect and update. Therefore, there will not be data tabulated for voting districts in CNMI. There will be data available at the block level and block level data is the primary data used for ensuring any electoral geography meets the requirements of the “one person one vote” principle.

Question 9. Paying Respondents

The Census Bureau 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 non-sensitive nature and is available to any person requesting it from 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 RDP based the estimated hour burden on the 2010 Census RDP collection. The RDP is an operation that must continue as the Census Bureau moves toward the 2020 Census. During FY 2016 through 2018, the RDP conducted the BBSP, the collection and verification of the 115th and 116th Congressional districts and state legislative data, and the delineation of the VTDP. The program will continue, in FY 2019, 2020, and 2021, to complete Phase 2. The maximum number of respondents for the RDP remains 52.

This includes all 50 states, the District of Columbia, and the Commonwealth of Puerto Rico.

Phases/Activities	Estimated number of Respondents	Estimated Time per Response (hours)	Estimated Total Hour Burden per Fiscal Year (FY)					Estimated Total Hour Burden per Phase & All Phases	
			Currently approved OMB			Renewal			
			2016	2017	2018	2019	2020		
Phase 1	BBSP Annotation Phase 1	52	124	6,448	-	-	-	-	9,672
	BBSP Verification Phase 1	52	62	-	3,224	-	-	-	
Phase 2	VTDP Delineation Phase 1	52	248	-	-	12,896	-	-	24,180
	VTDP Verification round one	52	124	-	-	-	6,448	-	
	VTDP Verification round two	52	93	-	-	-	-	4,836	
Phase 4	115th Congressional Districts (CDs & State Legislative Districts (SLDs) Collection	52	2	104	-	-	-	-	416
	115th CDs & SLDs Verification	52	2	104	-	-	-	-	
	116th CDs & SLDs Collection	52	2	-	-	104	-	-	
	116th CDs & SLDs Verification	52	2	-	-	104	-	-	
Total Estimated Hour Burden per OMB package (current and renewal)				6,656	3,224	13,104	6,448	4,836	34,268
				22,984			11,284		

As shown in the table above, the estimate hour burden to conduct RDP for all Phases is 34,268 hours. However, for FY 2019 through 2021, state liaisons will incur burden only during Phase 2 for the VTDP verification round one and two, with a total of 11,284 hours.

Estimated Total Annual Cost to Public: $((11,284 \text{ hours} * \$30.17) / 3 \text{ years}) = \$113,479$.

Question 13. Estimate Cost Burden

Participants should not incur any cost other than staff time. The Census Bureau estimates the cost burden over the FY 2019 through 2021 by multiplying the respective hour burden 11,284 by the average hourly wage \$30.17 and dividing by three. The Census Bureau provides free and stand-alone software with shapefiles on DVD or for download from the Census Bureau’s website. No special hardware or accounting software or system is necessary to provide answers to this information collection.

The information requested is of the type and scope normally contained in department offices and city and county government planning and tax assessing agencies. Therefore, respondents should not incur any 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 RDP geography data collection for FY 2019-2021 is approximately \$5,318,272 for each clearance year. The Census Redistricting and Voting Rights Data Office has

reviewed all requirements for conducting the RDP, including material and person-hour costs to arrive at this estimate and has determined that the resources are available for efficient administration of the RDP.

Question 15. Reason for Change in Burden

The RDP has added a second round of VTDP verification in 2020. Leading up to the decennial census, many geographies are changing simultaneously and consequently may affect the VTD geography. This second verification is necessary to make sure that VTD geographies are up-to-date and align with decennial geography. Since the VTDP verification round two is conducted over a two year period the annual burden hours were less than the previously approved collection.

Question 16. Project Schedule for Each Survey Year

Key Dates		
Date	RDP Phase	Event
December 2018	2	Start of VTDP Verification #1.
May 2019		End of VTDP Verification#1.
December 2019		Start of VTDP Verification # 2.
March 2020		End of VTDP Verification # 2.
April 2021	3	Delivery of the 2020 Decennial Census Redistricting Data.

Question 17. Request to Not Display Expiration Date

The RDP will display the expiration date on the Information Collection forms and on the Privacy Act Notice given to respondents.

Question 18. Exception to the Certification

There are no exceptions.

Appendix A

Documents Included in the 2020 Census RDP OMB Package

ID	Description or Title
20RDP-L-100	Invitation/Cover letter to notify participant about VTDP Verification (can be used for verification part 1 and two).
20RDP-G-110	Voting District Project GUPS User's Guide (can be used for both VTDP Verification one and two).
20RDP-G-111	Voting District (VTD) Project GUPS User's Guide Addendum: VTD Verification.
20RDP-G-112	User Supplied GIS User Guide for VTDP – non GUPS User Guide (can be used for both VTDP Verification one and two).