

SUPPORTING STATEMENT A
U.S. Department of Commerce
U.S. Census Bureau
2020 Public Use Microdata Areas Program
OMB Control No. 0607-XXXX

Abstract

Public Use Microdata Areas, or PUMAs are non-overlapping, statistical geographic areas that partition each state or equivalent entity into geographic areas containing no fewer than 100,000 people each. They cover the entirety of the United States, Puerto Rico, Guam, and the U.S. Virgin Islands. They are defined every ten years for the tabulation and dissemination of the decennial census and the American Community Survey (ACS) Public Use Microdata Sample (PUMS) data. Additionally, the ACS and Puerto Rico Community Survey use them to disseminate their respective period estimates.

The Census Bureau invites State Data Centers from each state, the District of Columbia, and Puerto Rico to delineate PUMAs. State Data Centers are encouraged to involve interested data users, such as those in tribal, state, and local (e.g., county, incorporated place, and town/township) governments, as well as regional planning agencies or organizations to ensure that the PUMAs meet the needs of a variety of data users. Though collaboration is encouraged, the State Data Centers are the primary participants for this program and must coordinate the delineation work suggested or prepared from others. The Census Bureau accepts PUMA submissions from each state's respective State Data Center.

Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The U.S. Census Bureau is requesting a new collection and project-specific Office of Management and Budget (OMB) Control Number to conduct the 2020 Public Use Microdata Areas Program (e.g., 2020 PUMA).

The 2020 PUMA is a voluntary program that seeks participation from State Data Centers from each state, the District of Columbia, and Puerto Rico to delineate PUMAs. PUMAs are non-overlapping, statistical geographic areas that partition each state or equivalent entity into geographic areas containing no fewer than 100,000 people each. They cover the entirety of the United States, Puerto Rico, Guam, and the U.S. Virgin Islands.

The Census Bureau is the only federal agency to create PUMAs; defining them every ten years for the tabulation and dissemination of the decennial census and the American Community Survey (ACS) Public Use Microdata Sample (PUMS) data, as well as the period estimates for the ACS and Puerto Rico Community Survey. The program occurs after the decennial census completes to ensure use of critical inputs (e.g., updated census tracts and the decennial census population counts).

The legal authority authorizing 2020 PUMA is Title 13 U.S.C., Section 6. Locate the Title 13 U.S.C.

Section 6 excerpt in Appendix A at the end of this document.

2. Indicate how, by whom, and for what purpose the information is to be used.

The Census Bureau defines Public Use Microdata Areas (PUMAs) for the tabulation and dissemination of the decennial census and the American Community Survey (ACS) Public Use Microdata Sample (PUMS) data. Additionally, the ACS and Puerto Rico Community Survey use them to disseminate their respective period estimates.

PUMS data are valuable to state and local planning agencies/offices, as well as students, for use in long-range planning and research projects. PUMS data files show the full range of population and housing unit responses collected on individual ACS questionnaires, for a subsample of ACS housing units and group quarters persons. PUMAs are a higher level of geography than census tract, or even county in some instances, and provide all data users with another level of geography for data analysis. Without PUMAs and PUMS data, the data community would not be able to create custom tables and statistics not available through pre-tabulated (or summary) data products.

The Census Bureau invites State Data Centers from each state, the District of Columbia, and Puerto Rico to delineate PUMAs using the Geographic Update Partnership Software (GUPS). GUPS is the only method of collection for the 2020 PUMA. State Data Centers are encouraged to involve other interested data users, such as those in tribal, state, and local (e.g., county, incorporated place, and town/township) governments, as well as regional planning agencies or organizations to ensure that the PUMAs meet the needs of a variety of data users.

The program occurs after the decennial census completes because the population counts and updated census tracts from the decennial census are critical inputs to PUMA delineation. Following Census Bureau processing of PUMA submissions, the resulting PUMAs are available online to all data users, not just State Data Centers.

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. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

For the 2020 PUMA, the Census Bureau implements information technology by using the internet to disseminate operational materials, instructions, and software, as well as using the internet as a means for participants to send their PUMA submissions. Numerous other uses of information

technology (e.g., control systems, records retrieval, etc.) within the agency assist internally with organization and management of the 2020 PUMA.

The Census Bureau continuously researches and develops new technology in the fields of geographic information system (GIS) software and web services to lessen the burden on its partners. For example, the Census Bureau developed the Geographic Update Partnership Software (GUPS) and the Secure Web Incoming Module (SWIM) to lessen the participant burden of preparing and submitting their PUMAs.

GUPS is a customized stand-alone software application that guides participants through each step of the delineation process. The software formats and packages the updates for easy submission to the Census Bureau for processing. The Census Bureau provides GUPS complimentary to all PUMA participants. SWIM is a web-based tool accessible from the internet.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.

The 2020 PUMA provides an opportunity for State Data Centers, in conjunction with other interested data users, to delineate Public Use Microdata Areas (PUMAs). The Census Bureau is the only agency that defines PUMAs. PUMAs are a unique geography so there is no duplication. No other decennial program or operation provides this opportunity.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

To reduce burden, the Census Bureau communicates about the 2020 PUMA using email correspondence rather than hardcopy letters that require supplies and postage. The Census Bureau requires use of the Geographic Update Partnership Software (GUPS), a self-contained, customized GIS that includes all the components necessary for participation in the 2020 PUMA. Because GUPS is user-friendly and ensures the submission is valid prior to submission to the Census Bureau, it minimizes the burden for participants because they do not have to establish their own process or systems for completing the PUMA delineation.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The Census Bureau is the only federal agency to create Public Use Microdata Areas (PUMAs). Without PUMAs, the Census Bureau would not be able to produce the American Community Survey (ACS) Public Use Microdata Sample (PUMS) data, which the data community uses to create custom tables and statistics not available through pre-tabulated (or summary) data products. PUMS data contain individual records of the characteristics for a sample of persons and households. PUMAs are the most detailed geographic areas within the PUMS data.

Not conducting 2020 PUMA would result in the inability to distribute census data by a level of geography (i.e., PUMAs) that is beneficial for many data users. A less frequent collection would result in census data tabulated for out-of-date geographies that would result in less relevant data for use by the public.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;** There are no special circumstances in the 2020 PUMA that require State Data Centers to report to the Census Bureau more often than quarterly.
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;** There are no special circumstances that require State Data Centers to prepare a written response in fewer than 30 days from the start of the 2020 PUMA.
- **requiring respondents to submit more than an original and two copies of any document;** There are no special circumstances in the 2020 PUMA that require State Data Centers to submit more than an original and two copies of any document they submit.
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;** There are no special circumstances in the 2020 PUMA that require State Data Centers to retain records for more than three years.
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;** There are no special circumstances because the 2020 PUMA is not a statistical survey.
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;** There are no special circumstances in the 2020 PUMA that require the use of a statistical data classification that has not been reviewed and approved by OMB.
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or** There are no special circumstances in the 2020 PUMA that violate confidentiality.
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.** There are no special circumstances in the 2020 PUMA that require the inclusion of proprietary trade secrets or other confidential information.

In summary, there are no special circumstances for this collection.

- 8. If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

The Census Bureau discussed the 2020 PUMA during a summer 2020 teleconference with the State Data Center Steering Committee and further detailed the program during the fall 2020 State Data Center Annual Meeting.

The public had an opportunity to review and submit comments on the 2020 PUMA during the 60-Day Notice of the Proposed Information Collection. The notice for public comment, entitled "2020 Public Use Microdata Areas Program", appeared in the Federal Register July 6, 2020, (Vol. 85, No. 129, pp. 40198-40199) with a consideration period ending September 4, 2020. The Census Bureau received no comments during the review period.

- 9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

The Census Bureau does not pay or provide gifts to State Data Centers that participate in the 2020 PUMA.

- 10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

The Privacy Act does not apply to the 2020 PUMA. Information requested in this survey is non-sensitive public information.

- 11. Provide additional justification for any questions of a sensitive nature.**

There are no questions of a sensitive nature included in the 2020 PUMA.

- 12. Provide estimates of the hour burden of the collection of information.**

Table 1: Estimated Annualized Respondent Burden Hours

| Information Collection | Estimated Annual # of Respondents (a) | Estimated Annual # of Responses/ Respondent (b) | Total # of Annual Responses (c) = (a) x (b) | Burden Hours/ Response (d) | Total Annual Burden Hours (e) = (c) x (d) |
|------------------------|---------------------------------------|---|---|----------------------------|---|
| 2020 PUMA | 52 | 1 | 52 | 40 | 2,080 |

Table 2: Estimated Annualized Respondent Costs

| Type of Respondent/ Occupational Title | Number of Respondents | Number of Responses per Respondent | Average Burden per Response | Hourly Wage Rate* | Total Burden Costs |
|--|--------------------------|---|-----------------------------------|-------------------------|-----------------------|
| Varies. See * below for Hourly Wage Rate column | 52 | 1 | 40 hours | \$33 | \$68,640 |
| Total | -- | -- | -- | -- | \$68,640 |

*Hourly wage rate derived from the May 2019 National Occupational Employment and Wage Estimates report located at the following website: <www.bls.gov/bls/blswage.htm> averaging five common position types that normally respond to Census Bureau geographic programs, e.g., Geographer (\$39.41), Cartographer/Photogrammetrist (\$33.55), Surveyor (\$32.66), Surveying/Mapping Technician (\$23.32), and Urban/Regional Planner (\$37.38).

The Census Bureau estimates participants will need no more than 40 hours to plan, prepare, and submit their PUMAs. Smaller states, i.e., those with less population, fewer counties, and fewer census tracts, will need less time than larger states to complete their delineation work. The maximum number of burden hours for the timeframe of the operation is 2,080 hours (i.e., 52 participants x 40 hours).

13. Provide an estimate for the total annual cost burden to respondents.

Other than the staff time to prepare the submission, there are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

14. Provide estimates of annualized cost to the Federal government.

The cost estimate to conduct the 2020 PUMA is approximately \$1,050,000. This estimate includes cost for the various divisions at Census Bureau headquarters involved with the 2020 PUMA. It covers the program’s development, starting in fiscal year 2018, through the completion of the program in fiscal year 2022.

15. Explain the reasons for any program changes or adjustments reported in ROCIS.

This is a new collection.

16. For collections of information whose results will be published, outline plans for tabulation and publication.

The schedule for participants ranges from September 2021, with the official program announcement and dissemination of instruction to begin work, through January 2022, with the submission of their PUMAs. Following the completion of Census Bureau processing, the finalized PUMAs will be available online beginning in summer of 2022.

Table 3: 2020 PUMA Schedule

| Date | Activity |
|------------------------------|---|
| September 2021 | Census Bureau sends email notification to State Data Center points of contact officially announcing the program and providing instructions to begin PUMA delineation. |
| Fall 2021 | Census Bureau conducts trainings for State Data Centers. |
| November 2021 – January 2022 | State Data Centers delineate and return their submission to the Census Bureau during this 90-day review period. |
| Summer 2022 | Census Bureau releases the final delineated PUMAs and their associated data online for use by the public. |

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The Census Bureau will display the expiration date for OMB approval on the information collection instruments and on the notification to participants announcing the program.

18. Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

There are no exceptions. The agency certifies compliance with [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#).

Appendix A:

Title 13 U.S.C. Section 6 *Excerpt from Title 13 U.S.C.*¹

§ 6. Information from other Federal departments and agencies; acquisition of reports from other governmental and private sources

(a) The Secretary, whenever he considers it advisable, may call upon any other department, agency, or establishment of the Federal Government, or of the government of the District of Columbia, for information pertinent to the work provided for in this title.

(b) The Secretary may acquire, by purchase or otherwise, from States, counties, cities, or other units of government, or their instrumentalities, or from private persons and agencies, such copies of records, reports, and other material as may be required for the efficient and economical conduct of the censuses and surveys provided for in this title.

(c) To the maximum extent possible and consistent with the kind, timeliness, quality and scope of the statistics required, the Secretary shall acquire and use information available from any source referred to in subsection (a) or (b) of this section instead of conducting direct inquiries.

(Aug. 31, 1954, ch. 1158, 68 Stat. 1013; Pub. L. 85-207, §3, Aug. 28, 1957, 71 Stat. 481; Pub. L. 94-521, §5(a), Oct. 17, 1976, 90 Stat. 2460.)

HISTORICAL AND REVISION NOTES

Based on title 13, U.S.C., 1952 ed., §§122, 215, 252, and section 1442 of title 42, U.S.C., 1952 ed., The Public Health and Welfare (June 18, 1929, ch. 28, §15, 46 Stat. 25; June 19, 1948, ch. 502, §2, 62 Stat. 479; July 15, 1949, ch. 338, title VI, §607, 63 Stat. 441; Sept. 7, 1950, ch. 910, §1, 64 Stat. 784).

Section consolidates section 215 of title 13, U.S.C., 1952 ed., with those parts of sections 122 and 252 of such title which respectively made such section 215 applicable to the quinquennial censuses of manufacturers and the mineral industries and other businesses, and governments, and with that part of subsection (b) of section 1442 of title 42, U.S.C., 1952 ed., which made such section 215 applicable to the decennial censuses of housing (see subchapters I, II, and III of chapter 5 of this title). As originally enacted in 1929, such section 215 had related only to the decennial censuses of population, agriculture, etc., the provisions for which are continued in subchapter II of chapter 5 of this title.

The provisions, as revised in this section, relate, not only to the censuses referred to above, but also, to all other investigations provided for in this title. This was probably the Congressional intent.

Words in section 215 of title 13, U.S.C., 1952 ed., “on request of the Director of the Census”, were omitted since all functions under this title are vested primarily in the Secretary (of Commerce), in view of 1950 Reorganization Plan No. 5, §§1, 2, eff. May 24, 1950, 15 F.R. 3174, 64 Stat. 1263. See Revision Note to section 4 of this title.

Changes were made in phraseology.

¹ For a complete reference to Title 13 U.S.C., refer to the following URL:

<<https://www.govinfo.gov/content/pkg/USCODE-2007-title13/pdf/USCODE-2007-title13.pdf>>.

For remainder of sections 122 and 252 of title 13, U.S.C., 1952 ed., and of section 1442 of title 42, U.S.C., 1952 ed. (which has been transferred in its entirety to this revised title), see Distribution Table.

AMENDMENTS

1976—Pub. L. 94-521 substituted “Information from other Federal departments and agencies; acquisition of reports from other governmental and private sources” for “Requests to other departments and offices for information, acquisition of reports from governmental and other sources” in section catchline.

Subsec. (a). Pub. L. 94-521 substituted “considers” for “deems”, and “agency, or establishment of the Federal Government, or of the government of the District of Columbia” for “or office of the Government”.

Subsec. (c). Pub. L. 94-521 added subsec. (c). 1957—Pub. L. 85-207 inserted “, acquisition of reports from governmental and other sources” in section catchline, designated existing provisions as subsec. (a), and added subsec. (b).

EFFECTIVE DATE OF 1976 AMENDMENT

Amendment by Pub. L. 94-521 effective Oct. 17, 1976, see section 17 of Pub. L. 94-521, set out as a note under section 1 of this title.