

SUPPORTING STATEMENT A
U.S. Department of Commerce
U.S. Census Bureau
Boundary and Annexation Survey
Office of Management and Budget Control No. 0607-0151

Abstract

The Boundary and Annexation Survey (BAS) provides tribal, state, and local governments an opportunity to review the Census Bureau's legal boundary data to ensure the Census Bureau has correct boundary, name, and status information. BAS also allows participants to review and provide updates to census designated places (CDPs). BAS fulfills the agency's responsibility as part of the National Spatial Data Infrastructure, for which the Office of Management and Budget (OMB) Circular A-16 designates the Census Bureau as the lead federal agency for maintaining national data about legal government boundaries, as well as statistical and administrative boundaries. BAS supports the spatial data steward responsibilities of the OMB E-Gov, Data.gov, the National Map, and Geographic Names Information System (GNIS).

The Census Bureau uses the boundaries collected in BAS to tabulate data for various censuses and surveys including the decennial census, American Community Survey (ACS), and Population Estimates Program (PEP). It also uses the legal boundaries collected through BAS to support several other programs such as the Economic Census, the Geographic Update Population Certification Program, the Redistricting Data Program, and the Special Census program.

Numerous federal programs also rely on accurate boundaries collected through BAS. The U.S. Geological Survey's National Map is updated annually to depict the legal boundaries provided by BAS. The Department of Housing and Urban Development uses legal boundaries to determine jurisdictional eligibility for various grant programs, such as the Community Development Block Grant program. In addition, the Department of Agriculture uses legal boundaries to determine eligibility for various rural housing and economic development programs.

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.**

This request is for the clearance to continue the BAS. The Census Bureau is requesting a revision of a currently approved collection. The authority for conducting activities in this document comes from Title 13, United States Code, Section 6. BAS updates the tribal, state, and local government boundary inventory for compliance with responsibilities specified in the 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 GNIS. BAS results provide information documenting the creation of newly incorporated municipalities and designated tribal areas (including American Indian Reservations and Off-Reservation Trust Lands). BAS also includes the dissolution of incorporated places and minor civil divisions (MCDs), and changes in the boundaries of tribal, state, and local governments. BAS information provides an appropriate record for reporting the results of the decennial and economic censuses, including surveys such as the ACS and PEP.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The data and information collected from the BAS serves tribal, federal, state, and local governments and the private sector. BAS is the primary provider for the following services and products:

- 1) Classify legal boundary data collected in the decennial and economic censuses and annual surveys.
- 2) Serve as the primary source of information regarding new incorporations, disincorporations, and other changes in the tribal, state, and local government inventory for the Federal Information Processing Standards and GNIS programs, state, and local officials, and private data users.
- 3) Updated population estimates through the creation of new governments, the dissolution of governments, or changes in boundaries for existing tribal, state, or local governments.
- 4) Serve as the source for tribal, state, and local government boundary information as a framework layer 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 (fully described in the Census Bureau's Information Quality Guidelines). In addition, information quality is integral to information collections conducted by the Census Bureau, and it 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.

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. Digital

partners have multiple options for participating in the BAS. As of the 2021 BAS, digital partners have the option to submit BAS updates via the Geographic Update Partnership Software (GUPS) or their own GIS. GUPS is free to all participants wishing to participate digitally. 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 geographic partnership programs.

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 can send the BAS materials to the participant via CD/DVD upon request. Paper map participants can also download digital representations of their boundaries from the internet in PDF format or request a CD/DVD of their PDF maps. The Census Bureau also provides an easy-to-use web mapping service, the Topologically Integrated Geographic Encoding and Referencing (TIGER) web system (commonly referred to as TIGERweb), enabling participants to compare and view their boundaries in relationship to other geographic areas and imagery. The Census Bureau will also conduct BAS workshops online and in-person trainings to reduce burden. These trainings provide an opportunity for respondents to ask questions about the survey.

BAS partners have opportunities to respond to the survey electronically. The Census Bureau estimates that approximately 75% of the reporting universe partners who respond will do so electronically. A partner may report a "no change" response through email or on-line. In addition, a partner may respond with no changes or request materials electronically through email, and digital updates can be submitted through the Secure Web Incoming Module (SWIM), or by mailing us CD/DVD media.

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.

Boundary data can be obtained and updated from tribal, state, and local 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.

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

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

In addition, to lessen the burden on smaller governments, the Census Bureau offers two types of consolidated responses for governments responding 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 the legal governments within their county 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, consolidated cities, MCDs (if applicable), and counties and county equivalents 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 reduces the duplication of effort among the various levels of government and reduces the cost burden associated with the annual BAS.

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.

BAS must continue to support the decennial census, ACS, PEP, and geographic partnership programs. Conducting them 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, less frequent surveys 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.

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,
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document,
- requiring respondents to retain records, other than health, medical, government contract, grant-in- aid, or tax 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,
- requiring 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
- 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 BAS that require participants to report to the Census Bureau more often than quarterly. There are no special circumstances that require participants to prepare a written response in fewer than 30 days from the start of the BAS. There are no special circumstances in the BAS that require participants to submit more than an original and two copies of any document they submit. There are no special circumstances in the BAS that require participants to retain records for more than three years. There are no special circumstances regarding a statistical survey because the BAS is not one. There are no special circumstances in the BAS that require the use of a statistical data classification that has not been reviewed and approved by the OMB. There are no special circumstances in the BAS that violate confidentiality. There are no special circumstances in the BAS that require the inclusion of proprietary trade secrets or other confidential information.

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.**

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The Federal Register Notice was issued on Tuesday, May 18, 2021, Vol. 86, No. 94, pages 26892-26896. There were no public comments received in response to the publication of the Pre-submission Notice.

The purpose, methodology, and problems of the BAS are discussed with tribal, state, and local government officials, plus a network of frequent users of Census Bureau data, during periodical local and national meetings of tribal, state, and local 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 consulted with during 2021.

Jefferson County, WV Todd Fagan GIS Director 116 E Washington St. Suite 201 Charles Town, WV 25414 304-724-6759 tfagan@jeffersoncountywv.org	Commonwealth of Kentucky Kandie Adkinson Administrative Supervisor Secretary of State Land Office Division 702 Capital Ave. Frankfort, KY 40601 502-782-7408 kandie.adkinson@ky.gov
State of Utah Sean Fernandez Surveyor and Local Partnerships Lead Automated Geographic Reference Center 1 State Office Building Salt Lake City, UT 84114 801-209-9359 sfernandez@utah.gov	State of Washington Mike Mohrman Senior Forecast Analyst Financial Management, Forecasting & Research Division 106 11 th Ave SW Suite 2200 Olympia, WA 98501 360-902-0599 pop.annexations@ofm.wa.gov
State of Arkansas Shelby Johnson State Geographic Information Officer 1 Capital Mall Suite 6D Little Rock, AR 72201 501-682-2943 shelby.johnson@arkansas.gov	State of Wisconsin Ryan Squires GIS Manager Legislative Technology Services Bureau 17 W Main Street Suite 200 Madison, WI 53703 608-283-1814 ryan.squires@legis.wisconsin.gov
State of Georgia Lisa Westin Senior GIS Specialist Community Affairs 60 Executive Park S NE Atlanta, GA 30329 404-679-3135 lisa.westin@dca.ga.gov	Fairview Industries Nancy Von Meyer P.O. Box 100 Pendleton, SC 29670 864-646-2755 nancy@fairview-industries.com

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 respondents or provide them with gifts for responding to this survey.

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.

All information requested in this survey is public information of a non-sensitive 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.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature in this survey.

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

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under 'Annual Cost to Federal Government' (Item #14).

The Census Bureau based the estimated hour burden using the 2020 and 2021 BAS. Burden hours vary for each year, so the Census Bureau is providing the maximum burden. The projected number of respondents and the estimated burden for the 2022 through 2024 BAS are the following:

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)
BAS	40,000	1	40,000	7.5	300,000

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

There are no capital costs or operating and maintenance costs associated with this information collection.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

Agencies may also aggregate cost estimates from Question 12, 13, and 14 in a single table.

The estimate to conduct the BAS is approximately \$17,000,000 annually. This includes costs for the Census Bureau's National Processing Center, Regional Offices, and Headquarters. The Census Bureau's Geography Division has 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.

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

The following changes have been made to the BAS program for the 2022-2024 clearance cycle. Many of the changes outlined below are designed to reduce the amount of paper materials included in the survey as well as the overall cost to conduct the survey.

- The paper BAS annual response form will no longer be included in the annual response mailing. Participants are instead instructed to email their response or provide their response online.
- State specific inserts will no longer be included in the materials packages. All state specific inserts will be available to all participants when they respond online.
- BAS participants will be permitted to provide CDP updates as part of their BAS submission. This will allow for intercensal updates on this specific type of statistical geography.
- The Boundary Validation Program (BVP) has been removed. The BVP is a decennial census only program and was included in the previous clearance to cover the 2020 Census.
- Boundary Quality has replaced the Boundary Quality Assurance and Reconciliation Project. While the nature of the work will remain the same, the scope of the work will also include CDP review. The goal of Boundary Quality will be to obtain quality data from tribal, state, and local governments to improve the accuracy of the boundary data in the Master Address File/TIGER System.
- The BAS State Certification Program will use email rather than a physical mailing to contact both the state governors' offices and the appointed state certifying official. The content will remain the same but will be delivered electronically.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

- January 1—Boundary updates must be legally in effect on or before this date to be reported in the current survey year.
- January to May—Tribal, state, and local governments respond during annual response or non-response follow-up indicating if they have legal boundary, CDP, or contact updates to report. Those with boundary updates to report download or request materials to create a submission to return to the Census Bureau.
- Early January—The Census Bureau sends the annual response email. Tribal, state, and local governments are contacted through email to determine if they have legal boundary, CDP, or contact updates to report.
- Late January—The Census Bureau sends the annual response letter. Tribal, state, and local governments that do not have an email address on file with the Census Bureau or did not respond to the annual response email are contacted through mail to determine if they have legal boundary, CDP, or contact updates to report.
- Mid-February—The Census Bureau conducts BAS non-response follow-up through email. Governments that have not responded to annual response, along with those that indicated they have boundary changes to report, are contacted through email.
- March 1—Boundary updates returned by this date will be reflected in the ACS and PEP data and in next year's BAS materials.
- March to May—The Census Bureau conducts BAS non-response telephone follow-up. Governments that did not respond to the annual response email, letter, and non-response email are contacted over the phone to determine if they have any legal boundary, CDP, or contact updates to report.
- May 31—Boundary updates returned by this date will be reflected in next year's BAS materials.

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 agency plans to display the expiration date for OMB approval of the information collection on participant invitation letters and collection instruments.

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

The agency certifies compliance with [5 Code of Federal Regulations \(CFR\) 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#).

Appendix A. BAS Participant Materials List

ID	Description or Title
Letters	
BAS-1L	To BAS contacts of governments that are not in a CBAS or state BAS agreement.
BAS-2L	To BAS contacts of tribal governments.
BAS-3L	To highest elected official (HEO) contact of governments in a CBAS or state BAS agreement.
BAS-4L	To the BAS contact of governments not currently in a CBAS agreement but their county is.
BAS-5L	To the BAS contact of governments partially in a CBAS agreement. Entity in more than one county and one or more counties participates in CBAS (Partial CBAS).
BAS-6L	To CBAS county contacts.
BAS-9L	Cover letter for BAS materials package and GUPS DVD packages.
Forms	
BAS1	BAS submission form - incorporated places.
BAS2	BAS submission form - counties.
BAS3	BAS submission form - MCDs.
BAS5	BAS submission form - tribal.
BAS6	CBAS agreement form.
BASSC-1L	State certifying official form.
BASSC-3L	Discrepancy form - added changes.
BASSC-4L	Discrepancy form - removed changes.
Inserts	
BAS-5I	Paper materials checklist
Emails	
BAS-E-1L	To BAS contacts of governments that are not in a CBAS or state BAS agreement.
BAS-E-2L	To BAS contacts of tribal governments.
BAS-E-3L	To HEO contact of governments in a CBAS or state BAS agreement.
BAS-E-4L	To the BAS contact of governments not currently in a CBAS agreement but their county is.
BAS-E-5L	To the BAS contact of governments partially in a CBAS agreement; Entity in more than one county and one or more counties participates in CBAS (Partial CBAS).

ID	Description or Title
BAS-E-6L	To CBAS county contacts.
BAS-E-7L	Courtesy copy of email sent to governments that receive the BAS-E-3L email to notify the tribal chair/HEO about the BAS but that their county submits to BAS on their behalf.
BAS-E-SA	BAS email to state agreement contacts.
BAS-E-NRFU1	BAS non-response followup email (true non-response).
BAS-E-NRFU2	BAS non-response follow-up email to governments that responded they have changes to report, but have not yet submitted those changes.
BAS-E-SWIM-HasAcct	Email to respondents that request digital BAS materials or report they will provide updates digitally and the email address has a SWIM account associated with it already.
BAS-E-SWIM-Token	SWIM token email to respondents that request digital BAS materials or report they will provide updates digitally and there is not a SWIM account associated with the email.
BASSC-E-1L	BAS state certification email to the governor's offices.
BASSC-E-2L	BAS state certification email to the state certifying officials.
BASSC-E-3L	BAS state certification email to BAS respondents where the state certifying official identified annexations to be added to the Census Bureau data.
BASSC-E-4L	BAS state certification email to BAS respondents where the state certifying official identifying annexations to be removed from the Census Bureau data.
BASSC-E-NRFU1	BAS state certification non-response email to the governor's offices.
BASSC-E-NRFU2	BAS state certification non-response email to the state certifying officials.
Guides	
BAS Partnership Toolbox – How-To Guide	Information on functionality, as well as guidelines for updating and editing your BAS data using the BAS partnership tools.
GUPS – How-To Guide	Step by step instructions on how to review your boundaries, prepare your BAS submission, and submit your BAS updates.
BAS Paper Maps – How-To Guide	Step by step instructions on how to review your boundaries, prepare your BAS submission, and submit your BAS updates.
BAS State Certification –	Step by step instructions on how to complete the state

ID	Description or Title
How-To Guide	certification process.