

SUPPORTING STATEMENT A
U.S. Department of Commerce
U.S. Census Bureau
Spatial, Address, and Imagery Data Program
Office of Management and Budget Control No. 0607-1008

Abstract

The Spatial, Address, and Imagery Data (SAID) Program is one of many voluntary geographic partnership programs that collects data to update the U.S. Census Bureau's geographic database, known as the Master Address File/Topologically Integrated Geographic Encoding and Referencing (MAF/TIGER) System. The Census Bureau uses the MAF/TIGER System to link statistical data from censuses and surveys to locations and areas, such as American Indian reservations, states, counties, incorporated places, and census tracts. To tabulate census and survey response data properly, the Census Bureau must have current and accurate addresses, street centerlines, and imagery.

The SAID Program provides the Census Bureau with a continuous method to obtain current, accurate, and complete address, street centerline, and imagery data from tribal, state, and local governments as well as other federal agencies and authoritative data source organizations. The purpose of the SAID Program is to help maintain the Census Bureau's geographic framework for data collection, tabulation, and dissemination to support ongoing surveys and programs such as the American Community Survey and the Population Estimates Program, as well as the 2030 Census. The SAID Program will continue to focus on acquiring addresses, street centerlines, and imagery in areas identified with housing unit growth or change.

The Census Bureau is requesting clearance to continue the SAID Program. As the current OMB Control Number 0607-1008 clearance will expire in January 2025, the new clearance will allow the Census Bureau to continue data acquisition to support MAF/TIGER System updates, quality control, and change detection.

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 Census Bureau requests clearance to conduct the SAID Program by requesting a revision of a currently approved collection (OMB Control No. 0607-1008). The legal authority for the SAID Program is Title 13 U.S.C., Sections 6, 16, 141, and 193. Please see the excerpt from Title 13 U.S.C. in Appendix A at the end of this document for more information about this legal authority.

The Census Bureau does not provide Title 13 protected materials to SAID Program partners;

however, when partners submit individual address records, the Census Bureau will protect the submitted data under Title 13, U.S.C. Section 9 that provides for the confidential treatment of census-related information, including individual address and structure coordinates.

The SAID Program is an ongoing program to collect current address, street, and imagery data from partners. These data are used to maintain the Census Bureau's geographic framework for data collection, tabulation, and dissemination to support ongoing surveys and programs such as the American Community Survey and the Population Estimates Program as well as the 2030 Census.

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 SAID Program provides the Census Bureau with a continuous method to obtain current, accurate, and complete spatial, address, and imagery data. The program supports the Census Bureau's ongoing demographic surveys and programs, such as the American Community Survey and the Population Estimates Program, as well as the 2030 Census planning efforts by continuing improvements to address coverage, collecting and updating streets, and enhancing the overall quality and integrity of the MAF/TIGER System after major census update programs have concluded.

The data collected in the SAID Program supports the Census Bureau's geographic framework for data collection, tabulation, and dissemination. This framework enables the Census Bureau field personnel to navigate to the appropriate locations for data collection and it enables the Census Bureau to accurately link demographic data from surveys and the decennial census to locations and areas, such as cities, school districts, and counties for data tabulation and dissemination. The data can be used to define geographic boundaries, including census blocks, and to place households and group quarters in a specific census block.

The SAID Program has enabled the Census Bureau to update addresses and street centerlines across the country, with participation covering nearly 89 percent of the housing units in the nation. Moving forward, the SAID Program will continue to focus on acquiring addresses, street centerlines, and imagery in targeted areas.

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 SAID Program, the Census Bureau implements information technology by using the internet as a means for partners to submit their files to the Census Bureau as well as a means of contact with the potential partners. Where possible, Census Bureau employees directly download openly available data from the internet, provided it meets program guidelines and there are no use constraints.

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 partners. For example, the Census Bureau developed the Secure Web Incoming Module (SWIM) to provide a secure method of file sharing for many of its programs. The SAID Program partners use SWIM, or equivalent file transfer module, to submit their files. For imagery files that are too large for transfer using SWIM, other data transfer mechanisms may be used, such as through the delivery of data on hard drives or direct download from partner sites. Numerous other uses of information technology (e.g., control systems, records retrieval, etc.) within the agency assist internally with organization and management of the SAID Program.

- 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.**

Where possible, the SAID Program attempts to eliminate duplicative calls for data by identifying the partner with the greatest geographic coverage. For example, the Census Bureau will attempt to work with the state or county before reaching out to all the incorporated places (e.g., cities, boroughs, villages) or towns/townships within the state. Additionally, data collected in the SAID Program is carefully managed in a geographic inventory and jurisdictional overlap is monitored. In terms of duplication of data collection, the SAID Program attempts to complement existing data collection programs since it occurs annually, unlike other decennial programs that occur once a decade as part of the census cycle. The Department of Transportation, in support of the National Address Database (NAD), collects address data from partners, but they are not doing direct, targeted outreach to partners to collect their data. Rather, the partners voluntarily provide their data to the Department of Transportation in support of the NAD.

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

To reduce burden on small entities, the Census Bureau seeks partnerships that have the greatest/largest geographic coverage (i.e., states and counties before contacting sub-county

partners). Additionally, the Census Bureau requests files be submitted using SWIM, or equivalent file transfer module, instead of the mail to lessen burden of postage and communicates as much as possible about the SAID Program using the telephone and email correspondence for the same reason, to limit the burden of partners purchasing postage and burning files onto CD/DVD.

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 SAID Program is a voluntary program targeting areas of growth or areas lacking Census data or coverage. Not conducting the SAID Program would greatly reduce the efficiency to maintain and update the Census Bureau's geographic framework for data collection, tabulation, and dissemination to support ongoing programs such as the American Community Survey (ACS), other current surveys, and the Population Estimates Program as well as the decennial census. A less frequent collection would have a negative effect on the currency of data supporting these programs, and consequently disrupt the flow of information to the agencies that use this information in administering their programs.

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 SAID Program that require partners 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 partners to prepare a written response in fewer than 30 days from the start of the SAID Program.
- **requiring respondents to submit more than an original and two copies of any document;** There are no special circumstances in the SAID Program that require partners 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 SAID Program that require partners 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 SAID Program 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 SAID Program 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 SAID Program 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 that require the inclusion of proprietary trade secrets or other confidential information with a SAID Program submission.

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.**

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 public had an opportunity to review and submit comments on the SAID Program during the 60-Day Notice of the Proposed Information Collection. The notice for public comment, entitled "Spatial, Address, and Imagery Data Program" appeared in the Federal Register July 2, 2024, (Vol. 89, No. 127, pp. 54766-54767) with a consideration period ending September 3, 2024. The Census Bureau received one comment during the review period, but it was out of scope for this program.

- 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 partners that participate in the SAID Program.

- 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 SAID Program. However, the requirements under Title 13, U.S.C. as applied to Census Bureau handling confidentiality for address data, are applicable for any individual addresses or map spots received as part of the SAID Program. Safeguards are in place to ensure only sworn Census Bureau employees, associated with the SAID Program have access to individual addresses provided with a SAID Program submission.

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 the SAID Program.

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

The projected number of respondents and the estimated burden are as follows:

Table 1: Estimated Annual Respondent Burden Hours

Information Collection	Estimated # of Respondents (a)	Estimated # of Responses/ Respondent (b)	Total # of Responses (c) = (a) x (b)	Burden Hours/ Response (d)	Total Burden Hours (e) = (c) x (d)
Census Bureau Contact with Respondents	500	1	500	1	500
Census Bureau Acquisition of Respondent Geographic Data and Content Clarification	250	1	250	1.5	375
Feedback	25	1	25	1	25
SAID Program (Total)					900

Table 2: Estimated Annual 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
See * note for Hourly Wage Rate column	500	1	1	\$35	\$17,500
	250	1	1.5	\$35	\$13,125
	25	1	1	\$35	\$875
					<u>Total</u> \$31,500

*Hourly wage rate derived from the May 2023 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 (\$43.69), Cartographer/Photogrammetrist (\$36.64), Surveyor (\$32.95), Surveying/Mapping Technician (\$23.53), and Urban/Regional Planner (\$39.33).

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).

Participation in the SAID Program is voluntary. Other than staff time to assemble the local data for 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. 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.

Table 3: Estimated Annualized Costs to the Federal Government

Staff	Grade/Step	Total Days Effort (One Fiscal Year)	Flat Annual Cost	Total Annualized Cost to Gov't
Federal Oversight				
Geography Division				
<i>Geospatial Reference Data Branch</i>				
Branch Chief	14/05	10	\$6,056	\$8,902
Team Lead (2)	13/05	42	\$21,524	\$31,640
Staff (2)	12/05	112	\$48,268	\$70,954
Address Sourcing and Policy Branch				
Staff (1)	12/05	13	\$5,602	\$8,235
Coverage, Evaluation, and Analytics Branch				
Staff (1)	12/05	13	\$5,602	\$8,235
Total Annual Cost to the Government			\$87,052	\$127,966

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

Though the addition of a feedback component added burden, the overall reduction of burden for the SAID Program for the 2025-2028 clearance cycle from the previous collection (2022-2025) is primarily due to a program change, focusing even further on needs-based acquisition instead of attempts to acquire resources for the entire nation, and the availability of the NAD, an open, partial coverage address database for the nation that will reduce acquisition efforts and time in

many areas, as well as some processing time.

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.

- October 2024 – August 2025 – Contact FY2025 partners to identify existence of data (spatial, address, and/or imagery) and discuss file acquisition process, begin file acquisition, conduct updates to MAF/TIGER System from acquired files, prepare feedback to partners regarding the submitted files.
- November 2024 – September 2025 – Send feedback to FY2025 partners.
- September 2025 – Conclude FY2025 file acquisition and updates.
- October 2025 – August 2026 – Contact FY2026 partners to identify existence of data (spatial, address, and/or imagery) and discuss file acquisition process, begin file acquisition, conduct updates to MAF/TIGER System from acquired files, prepare feedback to partners regarding the submitted files.
- November 2025 – September 2026 – Send feedback to FY2026 partners.
- September 2026 – Conclude FY2026 file acquisition and updates.
- October 2026 – August 2027 – Contact FY2027 partners to identify existence of data (spatial, address, and/or imagery) and discuss file acquisition process, begin file acquisition, conduct updates to MAF/TIGER System from acquired files, prepare feedback to partners regarding the submitted files.
- November 2026 – September 2027 – Send feedback to FY2027 partners.
- September 2027 – Conclude FY2027 file acquisition and updates.

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 collection instrument (SWIM), or equivalent file transfer module and on the Feedback form.

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. Sections 6, 16, 141 and 193 (*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.)

§16. Address information reviewed by States and local governments.

(a) The Secretary, to assist efforts to ensure the accuracy of censuses and surveys under this title, shall—

(1) publish standards defining the content and structure of address information which States and local units of general purpose government may submit to the Secretary to be used in developing a national address list;

(2)(A) develop and publish a timetable for the Bureau to receive, review, and respond to submissions of information under paragraph (1) before the decennial census date; and

(B) provide for a response by the Bureau with respect to such submissions in which the Bureau specifies its determinations regarding such information and the reasons for such determinations; and

(3) be subject to the review process developed under section 3 of the Census Address List Improvement Act of 1994 relating to responses pursuant to paragraph (2).

(b)(1) The Secretary—

(A) shall provide officials who are designated as census liaisons by a local unit of general purpose government with access to census address information for the purpose of verifying the accuracy of the address information of the Bureau for census and survey purposes; and

(B) together with such access, should provide an explanation of duties and obligations under this title.

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

www.govinfo.gov/content/pkg/USCODE-2007-title13/pdf/USCODE-2007-title13.pdf.

(2) Access under paragraph (1) shall be limited to address information concerning addresses within the local unit of general purpose government represented by the census liaison or an adjacent local unit of general purpose government.

(3) The Bureau should respond to each recommendation made by a census liaison concerning the accuracy of address information, including the determination (and reasons therefor) of the Bureau regarding each such recommendation.

(4) For the purposes of paragraph (1), in a case in which a local unit of general purpose government is within another local unit of general purpose government and is not independent of the enclosing unit, the census liaison shall be designated by the local unit of general purpose government which is within the enclosing local unit of general purpose government.

(5) A census liaison may not use information made available under paragraph (1) for any purpose other than the purpose specified in paragraph (1).

(c) For the purposes of this section—

(1) the term “local unit of general purpose government” has the meaning given such term by section 184(1) of this title; and

(2) the term “State” includes the District of Columbia, the Commonwealth of Puerto Rico, the Commonwealth of the Northern Mariana Islands, American Samoa, Guam, the Virgin Islands, and any other territory or possession of the United States.

(Added Pub. L. 103–430, § 2(a), Oct. 31, 1994, 108 Stat. 4393.)

§141. Population and other census information

(a) The Secretary shall, in the year 1980 and every 10 years thereafter, take a decennial census of population as of the first day of April of such year, which date shall be known as the “decennial census date”, in such form and content as he may determine, including the use of sampling procedures and special surveys. In connection with any such census, the Secretary is authorized to obtain such other census information as necessary.

(b) The tabulation of total population by States under subsection (a) of this section as required for the apportionment of Representatives in Congress among the several States shall be completed within 9 months after the census date and reported by the Secretary to the President of the United States.

(c) The officers or public bodies having initial responsibility for the legislative apportionment or districting of each State may, not later than 3 years before the decennial census date, submit to the Secretary a plan identifying the geographic areas for which specific tabulations of population are desired. Each such plan shall be developed in accordance with criteria established by the Secretary, which he shall furnish to such officers or public bodies not later than April 1 of the fourth year preceding the decennial census date. Such criteria shall include requirements which assure that such plan shall be developed in a nonpartisan manner. Should the Secretary find that a plan submitted by such officers or public bodies does not meet the criteria established by him, he shall consult to the

extent necessary with such officers or public bodies in order to achieve the alterations in such plan that he deems necessary to bring it into accord with such criteria. Any issues with respect to such plan remaining unresolved after such consultation shall be resolved by the Secretary, and in all cases he shall have final authority for determining the geographic format of such plan. Tabulations of population for the areas identified in any plan approved by the Secretary shall be completed by him as expeditiously as possible after the decennial census date and reported to the Governor of the State involved and to the officers or public bodies having responsibility for legislative apportionment or districting of such State, except that such tabulations of population of each State requesting a tabulation plan, and basic tabulations of population of each other State, shall, in any event, be completed, reported, and transmitted to each respective State within one year after the decennial census date.

(d) Without regard to subsections (a), (b), and (c) of this section, the Secretary, in the year 1985 and every 10 years thereafter, shall conduct a mid-decade census of population in such form and content as he may determine, including the use of sampling procedures and special surveys, taking into account the extent to which information to be obtained from such census will serve in lieu of information collected annually or less frequently in surveys or other statistical studies. The census shall be taken as of the first day of April of each such year, which date shall be known as the "mid-decade census date".

(e)(1) If—

(A) in the administration of any program established by or under Federal law which provides benefits to State or local governments or to other recipients, eligibility for or the amount of such benefits would (without regard to this paragraph) be determined by taking into account data obtained in the most recent decennial census, and

(B) comparable data is obtained in a mid-decade census conducted after such decennial census, then in the determination of such eligibility or amount of benefits the most recent data available from either the mid-decade or decennial census shall be used.

(2) Information obtained in any mid-decade census shall not be used for apportionment of Representatives in Congress among the several States, nor shall such information be used in prescribing congressional districts.

(f) With respect to each decennial and mid-decade census conducted under subsection (a) or (d) of this section, the Secretary shall submit to the committees of Congress having legislative jurisdiction over the census—

(1) not later than 3 years before the appropriate census date, a report containing the Secretary's determination of the subjects proposed to be included, and the types of information to be compiled, in such census;

(2) not later than 2 years before the appropriate census date, a report containing the Secretary's determination of the questions proposed to be included in such census; and

(3) after submission of a report under paragraph (1) or (2) of this subsection and before the

appropriate census date, if the Secretary finds new circumstances exist which necessitate that the subjects, types of information, or questions contained in reports so submitted be modified, a report containing the Secretary's determination of the subjects, types of information, or questions as proposed to be modified.

(g) As used in this section, "census of population" means a census of population, housing, and matters relating to population and housing.

(Aug. 31, 1954, ch. 1158, 68 Stat. 1019; Pub. L. 85-207, §9, Aug. 28, 1957, 71 Stat. 483; Pub. L. 94-171, §§1, 2(a), Dec. 23, 1975, 89 Stat. 1023, 1024; Pub. L. 94-521, §7(a), Oct. 17, 1976, 90 Stat. 2461.)

§193. Preliminary and supplemental statistics

In advance of, in conjunction with, or after the taking of each census provided for by this chapter, the Secretary may make surveys and collect such preliminary and supplementary statistics related to the main topic of the census as are necessary to the initiation, taking, or completion thereof.

(Added Pub. L. 85-207, § 14, Aug. 28, 1957, 71 Stat. 484.)