

**Department of Commerce  
United States Census Bureau  
OMB Information Collection Request  
2020 Census Local Update of Census Addresses Operation (LUCA)  
OMB Control Number 0607-XXXX**

**Part A – Justification**

**Question 1. Necessity of the Information Collection**

This request is for the clearance to conduct the 2020 Census Local Update of Census Addresses Operation (LUCA). The U.S. Census Bureau is requesting a new collection and a project-specific Office of Management and Budget (OMB) Control Number.

The authority for conducting activities in this document comes from Title 13, U.S.C., Chapter 1, Subchapter 1, Section 16.

The Census Bureau developed LUCA prior to the 2000 Census to meet the requirements of the Census Address List Improvement Act of 1994, Public Law 103-430. The Census Address List Improvement Act provides participating governments with an opportunity to improve the quality of data in the Master Address File/Topologically Integrated Geographic Encoding and Referencing (MAF/TIGER) System. The Census Bureau uses LUCA to assist with developing residential housing unit and group quarters (e.g., college dormitory, nursing home, correctional facility, etc.) address information to conduct the Decennial Census. LUCA is a voluntary operation available to all of the approximately 40,000 functioning tribal, state, and local governmental units, including the District of Columbia and Puerto Rico, in areas for which the Census Bureau performs a pre-census Address Canvassing Operation. A majority of governments will have some area that will be included in the Address Canvassing Operation. Participating governments may review the Census Bureau's confidential list of individual living quarters addresses and provide to the Census Bureau address additions, corrections, and/or deletions. Participating governments may also provide street centerline and street attribute updates.

The Census Address List Improvement Act of 1994 (Public Law 103-430, October 31, 1994, 108 Stat. 4393) mandates procedures used by the Census Bureau for developing the Decennial Census address list and address lists for other censuses and surveys conducted by the Census Bureau. The Act's provisions direct the Secretary of Commerce to: (1) publish standards defining the content and structure of address information that tribal, state, and local governments may submit to be used for developing a national address list; (2) develop and publish a timetable for the Census Bureau to receive, review, and respond to submissions; and (3) provide a response to the submissions regarding the Census Bureau's determination for each address. The Act also provides that OMB's Administrator of the Office of Information and Regulatory Affairs, acting through the Chief Statistician and in consultation with the Census Bureau, shall develop a process for tribal, state, and local governments to appeal determinations of the Census Bureau. The Act also directs the U.S. Postal Service (USPS) to provide the Secretary of Commerce with address information, as may be determined by the Secretary to be appropriate for use by the

Census Bureau. The Act authorizes the Census Bureau to provide designated officials of tribal, state, and local governments (who agree to pledges and conditions of confidentiality) with access to addresses information maintained at the Census Bureau.

### **Question 2. Needs and Uses**

The information collected by LUCA from participating governments is essential to ensure that MAF/TIGER has the highest quality of address data. Tribal, state, and local governments have current knowledge of and data about where housing growth and change are occurring in their jurisdictions. LUCA provides a critical partnership and mechanism for tribal, state, and local governments to work with the Census Bureau to update the agency's address lists and geographic information to ensure maximum coverage of population and living quarters, and to ensure that data associated with each address is tabulated in the correct block. Census Bureau data are used to distribute over \$400 billion dollars each year in federal funds to tribal, state, and local governments.

### **Question 3. Use of Information Technology**

The Census Bureau continually researches and develops new technology in the fields of Geographic Information Systems (GIS) and web services to lessen the burden on our LUCA partners. They now have multiple options for participating in LUCA. For example, they now may submit LUCA updates via the Geographic Update Partnership Software (GUPS) or use their own GIS software. 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 is a stand alone software that can be installed locally without the Internet. GUPS will reduce burden and paper costs for the Census Bureau and decrease usage of paper maps.

The Internet also plays a significant role in providing the public access to Census Bureau data. GUPS, along with its accompanying spatial data files, is available for download free from the Census Bureau's Internet site, or the Census Bureau, upon request, can send the LUCA materials to the participant via DVD. The Census Bureau will also conduct LUCA workshops online to reduce burden and to provide an opportunity for respondents to ask questions about the operation.

### **Question 4. Efforts to Identify Duplication**

The Census Bureau collaborates with the USPS and utilizes its Delivery Sequence File (DSF). However, the DSF coverage and currency are not consistent across the nation, nor does it always include multi-unit buildings with all of their associated addresses. Therefore, current and complete information about living quarters addresses collected for the LUCA Operation is best obtained directly from tribal, state, and local governments.

### Question 5. Minimizing Burden

The Census Bureau has devised several measures to minimize the response burden for governments participating in LUCA:

- The Census Bureau will supply participants with the GUPS, which streamlines the task of reviewing LUCA maps and address materials, including Census block maps with address structure points, and reduces the need for printing paper maps and address lists;
- The Census Bureau will offer promotional workshops and trainings to assist local governments with LUCA; and
- Digital shapefiles are available to participants, which significantly reduces the time to review LUCA maps and addresses and reduces the need for printing paper maps and address lists.

### Question 6. Consequences of Less Frequent Collection

LUCA occurs once a decade. Public Law 103-430 mandates that the Census Bureau offer LUCA prior to each Decennial Census.

### Question 7: Special Circumstances

This activity is required by law. Participation by governmental units is voluntary.

### Question 8: Consultations Outside the Agency

The Census Bureau continues to build partnerships with tribal, state, and local governments during periodic national and local meetings, conferences, and workshops. As stakeholders in the accuracy of the Census Bureau's address data in MAF/TIGER, partners are cooperative and willing to provide data for LUCA. The following is a representative sample of individuals we have collaborated with for LUCA.

State of North Carolina Bob Coats Governor's Census Liaison 20320 Mail Service Center Raleigh, NC 27699 919-807-4781 <a href="mailto:bob.coats@osbm.nc.gov">bob.coats@osbm.nc.gov</a>	State of Florida Amy Baker Coordinator 111 W Madison St. Suite 574 Tallahassee, FL 32399 850-487-1402 <a href="mailto:baker.amy@leg.state.fl.us">baker.amy@leg.state.fl.us</a>
New York, NY Joseph Salvo Director, Population Division 22 Reade St. New York, NY 10007 212-720-3434 <a href="mailto:jsalvo@planning.nyc.gov">jsalvo@planning.nyc.gov</a>	Mashpee Wampanoag Tribe Rita Lopez Enrollment Director 483 Great Neck Rd. South Mashpee, MA 02649 508-477-0208 <a href="mailto:rlopez@mwtribe.com">rlopez@mwtribe.com</a>

Maricopa County, AZ Gary Bilotta GIS Manager 111 S Third Ave. Phoenix, AZ 85003 602-506-4959 <a href="mailto:gbilotta@risc.maricopa.gov">gbilotta@risc.maricopa.gov</a>	State of New York Cheryl Benjamin GIS Project Manager 1220 Washington Ave. Bldg. 7A 4 <sup>th</sup> Floor Albany, NY 12207 518-242-5029 <a href="mailto:cheryl.benjamin@its.ny.gov">cheryl.benjamin@its.ny.gov</a>
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During conversations with these government officials, comments were favorable concerning the operation.

The Federal Register Notice announcement publication date was June 30, 2016 (81 FR pp. 42646-42648). Four comments were received during the consideration period ending August 29, 2016. The comments and responses below:

**Comment #1:** Received 8/8/2016. The National Association of Latino Elected and Appointed Officials (NALEO) Educational Fund requested copies of LUCA Forms in Spanish.

**Response:** PRA Liaison provided draft LUCA Forms in English on 8/22/2016.

**Comment #2:** Received 8/29/2016. The Nevada Federal State Cooperative for Population Estimates (FSCPE), commented that State Data Centers (SDCs) and FSCPEs should be part of a collaborative approach to conduct LUCA outreach with local governments and suggest funding a LUCA/MAF Coordinator either as a state or Census Bureau staff position.

**Response:** The Census Bureau has done presentations to the SDCs and FSCPEs on the progress of the LUCA operation development. We plan to request the SDCs and FSCPEs participate in the Geographic Update Partnership Software (GUPS) LUCA interface testing in February 2017. In addition, we will coordinate and discuss on collaborative efforts in LUCA outreach.

**Comment #3:** Received 8/29/2016. The Maricopa Association of Governments (MAG) commented that the Census Bureau should recognize the valuable contribution that regional Council of Governments (COGs) and Metropolitan Planning Organizations (MPOs) offer to member agencies and their encouragement to have local governments use and designate them as a LUCA liaison.

**Response:** In the LUCA materials, the Census Bureau has suggested a method for local governments to participate by designating their COG/MPO as their LUCA liaison.

**Comment #4:** Received 8/29/2016. NALEO Educational Fund commented on several aspects of the LUCA Operation.

- *"Continue sending block counts and accepting block count challenges in order to improve information about residences without city-style addresses and that do not receive mail delivery."*

**Response:** The Census Bureau is posting online the Census address counts by block for each government starting in January 2017.

- *"Take steps to protect against erroneous deletion of non-standard residential locations reported by LUCA participants."*

**Response:** We will research the request about erroneous deletion of non-standard residential addresses, as well as how to prevent the deletion of legitimate housing units.

- *"Continue to accept alternative identifiers for housing units within multi-unit addresses where unit numbers are not available or known."*

**Response:** The Census Bureau is accepting materials through the Geographic Support System (GSS) program. The GSS is an opportunity for governments to provide their address list for review and processing. The Census Address List Improvement Act of 1994, Public Law 103-430, regulates and established the implantation requirements for the LUCA operation. The duration of review by the participant is 120 days due to the requirement to process, validate, and update each address provided by participants.

- *"Seek exemptions from applicable Appropriations Act and Executive Order-based restrictions that may limit or prevent the hiring of culturally-competent noncitizens as in-field address canvassers."*

**Response:** This comment relates to federal hiring authorities, which falls outside of the scope of the Federal Register Notice for the 2020 LUCA Operation. The comment has been referred to the Census Bureau staff responsible for planning the recruiting and hiring efforts for the 2020 Census.

- *"Diversify notification and invitation methods."*

**Response:** The Census Bureau is sending notification to all eligible governments, participating in conferences at the state and national level, and sending notification through regional planning agencies. Materials will be available in both English and Spanish.

- *"...the Bureau should make maximum effort to secure opportunities to make presentations about the benefits of participating in LUCA at conferences and other meetings of associations of government officials, and to enlist organizations such as NALEO, the National Conference of State Legislatures, and National Hispanic Caucus of State Legislators, the National Association of Counties and National Association of Hispanic County Officials, the United States Conference of Mayors and the Latino*

*Alliance of Mayors, the National League of Cities and Hispanic Elected Local Officials..."*

**Response:** The Census Bureau is currently working with the Federal State Cooperative for Population Estimates (FSCPE) Committee, State Data Centers (SDCs), and reaching out to state and local governments through national and state conferences. We will review your list of recommended conference for inclusion in conference participation. In addition, the Census Bureau is working to established resolution of support with national organizations to support the LUCA operation. The first resolution was signed July 25, 2016 with the National Association of County Officials.

- *"Encourage cooperation between governmental entities eligible to participate."*

**Response:** The Census Bureau is encouraging coordinated responses, cooperation between governments through state government sponsored training session, conference participation, and partnership outreach.

- *"Encourage the Bureau to consider allocating a longer period in its proposed timeline for the 'Address Review' stage..."*

**Response:** The Census Bureau is accepting materials through the Geographic Support System (GSS) program. The GSS is an opportunity for governments to provide their address list for review and processing. The Census Address List Improvement Act of 1994, Public Law 103-430, regulates and established the implantation requirements for the LUCA operation. The duration of review by the participant is 120 days due to the requirement to process, validate, and update each address provided by participants. Participants can start researching their address list at the time the LUCA invitation letter is received which is starting in mid-July 2017. This is due to the Census Bureau posting online the Census address counts by block for each government starting in January 2017.

### **Question 9. Paying Respondents**

The Census Bureau does not pay respondents or provide them with gifts for responding to this operation.

### **Question 10. Assurance of Confidentiality**

The Census Bureau's address information and latitude/longitude structure points associated with residential addresses are confidential under Title 13 U.S.C. The Census Bureau requires LUCA respondents to protect the confidentiality of any Census data provided for review, and sets forth guidelines and procedures for their physical and information technology protection. The Census

Bureau informs the respondent of the confidential nature of these files and the voluntary nature of this operation 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 operation.

#### **Question 12. Estimate of Hour Burden**

The Census Bureau estimates that approximately 40,000 governments are eligible to participate in the voluntary LUCA. Burden hours vary depending on the size of the government and the number of addresses. Smaller governments with fewer addresses typically have a lower burden while larger governments with more addresses have a higher burden.

Number of Government Respondents	Government Size by Number of Addresses	Average Burden Hours	Total Burden Hours
34,000	< 6000	16	544,000
5,700	6,001 to 500,000	40	228,000
250	500,001 to 1,000,000	160	40,000
50	> 1,000,001	672	33,600
40,000	All Sizes	21	845,600

#### **Question 13. Estimated Cost Burden**

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

**Estimated Total Annual Cost to Public: \$23,854,376.**

#### **Question 14. Cost to Federal Government**

The estimate to conduct LUCA is approximately \$8,000,000. This includes costs for the Census Bureau's National Processing Center (NPC), Regional Offices, and Headquarters. The Decennial Census Management Division (DCMD) has reviewed all requirements for conducting LUCA, including material and person-hour costs to arrive at this estimate and has determined that the resources are available for efficient administration of LUCA.

#### **Question 15. Reason for Change in Burden**

This is a new information collection, which accounts for the change in burden.

**Question 16. Project Schedule for Each Survey Year**

<b>Milestone</b>	<b>Activity</b>
<b>January 2017</b>	Advance Notice
<b>February 2017</b>	Start Promotional Workshops
<b>May 2017</b>	End Promotional Workshops
<b>July 2017</b>	Invitation
<b>October 2017</b>	Start Training Workshops
<b>February 2018</b>	Start Shipping Participant Address Review Materials
<b>February 2018</b>	Start Processing Submissions
<b>April 2018</b>	End Shipping Participant Address Review Materials
<b>June 2018</b>	End Training Workshops
<b>September 2018</b>	End Processing Submissions
<b>August 2019</b>	Start Delivering Feedback Materials
<b>September 2019</b>	End Delivering Feedback Materials
<b>April 1, 2020</b>	Census Day
<b>June 2020</b>	Closeout

**Question 17. Request to Not Display Expiration Date**

The Census Bureau will display the assigned expiration date of this information collection on the LUCA forms.

**Question 18. Exception to the Certification**

There are no exceptions.

**Attachments**

ID	Description
<b>2020 LUCA Forms</b>	
D-2001	Contact Information Update Form
D-2001 (SP)	Contact Information Update Form (Spanish)
D-2002	Registration Form
D-2002 (SP)	Registration Form (Spanish)
D-2003	Product Preference Form
D-2003 (SP)	Product Preference Form (Spanish)
D-2003 (SG)	State Government Product Preference Form
D-2004	Confidentiality and Security Guidelines
D-2004 (SP)	Confidentiality and Security Guidelines (Spanish)
D-2005	Confidentiality Agreement Form
D-2005 (SP)	Confidentiality Agreement Form (Spanish)
D-2006	Self-Assessment Security Checklist
D-2006 (SP)	Self-Assessment Security Checklist (Spanish)
D-2007	Paper Address List
D-2007 (SP)	Paper Address List (Spanish)
D-2008	Paper Address List Add Page
D-2008 (SP)	Paper Address List Add Page (Spanish)
D-2009	Paper Address Count List
D-2009 (SP)	Paper Address Count List (Spanish)
D-2010	Map Sheet to Block Number Relationship List
D-2010 (SP)	Map Sheet to Block Number Relationship List (Spanish)
D-2011	Inventory Return Form (Paper)
D-2011 (SP)	Inventory Return Form (Paper) (Spanish)
D-2012	Destruction or Return Form
D-2012 (SP)	Destruction or Return Form (Spanish)
D-2101	Information Guide
D-2101	Information Guide (Spanish)
<b>Respondent Guides</b>	
D-2031	2020 LUCA Respondent Guide: Paper Format
D-2031 (SP)	2020 LUCA Puerto Rico Respondent Guide: Paper Format (Spanish)
D-2032	2020 LUCA Respondent Guide: Digital Format
D-2032 (SP)	2020 LUCA Puerto Rico Respondent Guide: Digital Format (Spanish)
D-2033	2020 LUCA Respondent Guide: GUPS
D-2033 (SP)	2020 LUCA Puerto Rico Respondent Guide: GUPS (Spanish)
<b>Advance Notice Letters</b>	
D-2050	Advance Notice Letter to LG and TG HEOs and CCs
D-2050 (SP)	Advance Notice Letter to Puerto Rico LG HEOs and CCs (Spanish)
D-2051	Advance Notice Letter to State Governors and CCs
D-2051 (SP)	Advance Notice Letter to Puerto Rico Governor (Spanish)
D-2052	Advance Notice Letter to Regional Planning Agencies, COGs, etc.
D-2053	Advance Notice Reminder Letter to LG and TG HEOs and CCs

<b>D-2053 (SP)</b>	Advance Notice Reminder Letter to LG HEOs and CCs in Puerto Rico (Spanish)
<b>D-2054</b>	Advance Notice Reminder Letter to State Governors and CCs
<b>D-2054 (SP)</b>	Advance Notice Reminder Letter to Puerto Rico Governor and CCs (if needed) (Spanish)
<b>D-2055</b>	Advance Notice Reminder Letter to Regional Planning Agencies, COGs, etc.
<b>Invitation Letters</b>	
<b>D-2060</b>	Invitation Letter to LG and TG HEOs and CCs
<b>D-2060 (SP)</b>	Invitation Letter to Puerto Rico LG HEOs and CCs (Spanish)
<b>D-2061</b>	Invitation Letter to State Governors and CCs
<b>D-2061 (SP)</b>	Invitation Letter to Puerto Rico Governor and CCs (Spanish)
<b>D-2062</b>	Invitation announcement to planning agencies, COGs, etc. that their member governments have been invited to participate in LUCA.
<b>Invitation Reminder Letters</b>	
<b>D-2066</b>	Invitation Deadline Letter: Date passed to register for 120-day review. Can still register but limited review time to LG and TG HEOs and CCs.
<b>D-2066 (SP)</b>	Invitation Deadline Letter: Date passed to register for 120-day review. Can still register but limited review time to Puerto Rico LG HEOs and CCs. (Spanish)
<b>D-2068</b>	Reminder postcard to register for LUCA to LG, TG, and state HEOs and CCs.
<b>D-2068 (SP)</b>	Reminder postcard to register for LUCA to Puerto Rico LG HEOs and CCs. (Spanish)
<b>D-2069</b>	Too late to register for LUCA to LG, TG, and state HEOs and CCs.
<b>D-2069 (SP)</b>	Too late to register for LUCA to Puerto Rico LG HEOs and CCs. (Spanish)
<b>Drop Out Letters</b>	
<b>D-2075</b>	Registered but dropped out before materials mailed to Liaison and HEO CC.
<b>D-2075 (SP)</b>	Registered but dropped out before materials mailed to Puerto Rico Liaison and HEO CC. (Spanish)
<b>D-2076</b>	Registered but dropped out after materials mailed to Liaison and HEO CC.
<b>D-2076 (SP)</b>	Registered but dropped out after materials mailed to Puerto Rico Liaison and HEO CC. (Spanish)
<b>No Change In Address Letter</b>	
<b>D-2079</b>	Letter stating no change in addresses with return envelope.
<b>D-2079 (SP)</b>	Letter stating no change in addresses with return envelope for Puerto Rico. (Spanish)
<b>Password Letter</b>	
<b>D-2080</b>	Password Letter to Liaisons.
<b>D-2080 (SP)</b>	Password Letter to Puerto Rico Liaisons. (Spanish)
<b>Operation Reminder Letter</b>	
<b>D-2081</b>	Reminder Letter: 30 day reminder sent 30 days after receipt of materials to Liaison and HEO CC.
<b>D-2081 (SP)</b>	Reminder Letter: 30 day reminder sent 30 days after receipt of materials to Puerto Rico Liaison and HEO CC. (Spanish)

<b>Deadline/Closeout Letters</b>	
<b>D-2084</b>	Deadline Passed Letter to Liaison and HEO CC.
<b>D-2084 (SP)</b>	Deadline Passed Letter to Puerto Rico Liaison and HEO CC. (Spanish)
<b>D-2086</b>	Liaison Letter: Registered and received materials but did not send updates.
<b>D-2086 (SP)</b>	Liaison Letter Puerto Rico: Registered and received materials but did not send updates. (Spanish)
<b>D-2087</b>	Liaison Letter: Responded to D-2086 but did not return Title 13 materials.
<b>D-2087 (SP)</b>	Liaison Letter Puerto Rico: Responded to D-2086 (SP) but did not return Title 13 materials. (Spanish)
<b>Information Guide/Flyer/Insert</b>	
<b>D-2101</b>	Information Guide: Information about LUCA. Mailed with Advance Notice and Invitation Package.
<b>D-2101 (SP)</b>	Information Guide: Information about LUCA. Mailed with Advance Notice and Invitation Package. (Spanish)
<b>D-2102</b>	Flyer: Brief overview of LUCA.
<b>D-2103</b>	Insert: Paperwork Reduction Act Burden Statement