

SUPPORTING STATEMENT
U.S. Department of Commerce
U.S. Census Bureau
Government Units Survey
OMB Control Number 0607-0930

Part A - Justification

1. Necessity of the Information Collection

Title 13, Section 161, of the United States Code requires the Secretary of Commerce to conduct a Census of Governments (CoG) every five years, in years ending in “2” and “7”. Section 193 provides for the collection of preliminary and supplementary statistics as related to the main topics of the CoG. This information request covers the Government Units Survey (GUS), which is the first component mailed for the 2022 Census of Governments. The Census Bureau uses information from the 2021 GUS to update its universe list of public sector entities prior to mailing the other CoG components. Each of the estimated 43,454 local governments to be contacted, including independent school districts, will receive login information to complete the questionnaire online (Attachment A). Respondents are asked to verify or correct the name and mailing address of the government, and answer up to seven questions to complete the survey. Respondents will skip questions depending on the type of government.

The 2021 GUS will target townships in 14 states, special districts in 40 states, and all independent school districts and educational service authorities (ESA). The scope for 2021 GUS collections is scaled back in comparison to the 2016 GUS collection operation. For greater efficiency, the 2021 GUS seeks information only from government units for which it is difficult to collect this information via other methods, such as Internet research. The Census Bureau uses multiple options for verifying information about in scope units not mailed to in the 2021 GUS. The first method is including these units in annual survey collections for the public sector. A second validation method is Census Bureau analysts request directory listings from state resources such as the state auditor’s office or other relevant offices. These resources send the Census Bureau current directory listings based on filing requirements the local governments (units) must report to the state on a routine basis (e.g., quarterly, or annually). As a result, the Census Bureau has found directory listings to be reliable sources for obtaining current information for local governments in some states. A third validation option entails Census Bureau staff reviewing state legislation each year to identify new bills or repealed bills that provide current information of legislative changes that impact local government units.

The 2021 GUS consists predominately of yes/no type questions designed to determine whether a government unit is in operation and verify contact information. Other questions collect information about the government unit’s function, legal organization, and other characteristics. This set of questions consists of checkbox and drop-down menu selections.

2. Needs and Uses

The GUS serves multiple purposes. The GUS is a direct means to obtain descriptive information on basic characteristics of governments; to identify and delete dissolved units on the Census Bureau universe frame; to identify duplicate units and changes to hierarchal structure; to update and verify

government unit mailing addresses and contacts; and to update school unit information on the universe frame for other public sector surveys at the Census Bureau that reference this universe. In addition, the 2021 GUS provides critical information needed to maintain the frame from which all public sector surveys are drawn. The GUS is particularly beneficial for identifying smaller units that have not been selected in an annual survey conducted in non-census years. GUS is also beneficial in identifying changes to the universe of special district governments that experience substantial change in a five-year period.

Information quality is an integral part of the pre-dissemination review of statistics the Census Bureau disseminates (as fully described in the Census Bureau's Information Quality Guidelines). Information quality is also integral for Census Bureau collections and is incorporated into the clearance process as required by the Paperwork Reduction Act. Appropriate coverage of annual and quarterly survey frames improve as a result of updates from the GUS.

In addition, federal legislation relevant to the American workforce, the Fair Labor Standards Act (FLSA) and the Family Medical Leave Act, refer to the list of governments the Census Bureau maintains for purposes of administering provisions of these laws. The Bureau of Justice Statistics maintains an interest in the list of active governments and their activities for purposes of administering grant programs. The Bureau of Economic Analysis (BEA) uses products from the CoG including the counts of state and local governments; and state and local government employment and payroll data. BEA also uses revenue, expenditures, debt, and financial assets data from the Census of Governments for principal inputs to the local government portion of their Gross Domestic Product publication. Users from academia, research organizations, governments, public interest groups, and various businesses provide evidence of their interest through requests for information and requests for assistance in accessing government universe information available on the Census Bureau's Internet web site.

3. Use of Information Technology

The Census Bureau is using information technology to reduce respondent burden in the following ways:

a. Electronic Submissions

The GUS requires respondents to complete the questionnaire via the Internet. Instructions for reporting via the Internet are included in the initial letter as well as the follow-up notices.

We estimate that 90 percent of respondents will utilize the Census Bureau's web instrument independently. The remaining 10 percent of respondents who either do not have Internet access, or encounter issues such as Internet firewalls that prevent access to the secure portal, will work with Census Bureau customer service staff to report via telephone as an alternative. Customer service staff are equipped to collect a respondent's information via phone and key their responses directly into the GUS online response instrument.

b. Processing technology

The GUS will employ automated check-in procedures that generate and distribute daily check-in reports.

c. Publication Dissemination

All 2022 Census of Governments data, summary tables, and files will continue to be released on the Internet. At the Internet website (census.gov/govs/), users will find CoG documentation, summary tables, and files for review and/or download.

4. Efforts to Identify Duplication

The GUS does not duplicate any other data collection. The Census of Governments is the only source of nationwide data on governments. There are no other comprehensive sources of this national information.

5. Minimizing Burden

The GUS asks mainly a series of yes/no type questions in efforts to reduce the overall burden data collection imposes on respondents (Attachment B). The number of questions for the 2021 GUS has increased slightly compared to the number of questions asked in the 2016 GUS. Questions asked for the 2021 GUS will elicit responses from a fewer number of government units. The GUS includes skip patterns based on the type of government, which are embedded into the online reporting instrument. The Centurion online response instrument implements skip patterns automatically by limiting the questions each government type is able to view. GUS questions that are not applicable for a particular government type are therefore unavailable (hidden from display) on the collection instrument. The complete set of GUS questions is provided in Attachment B.

The following bullet list indicates questions that will display in the online reporting instrument for each government type. For 2021 GUS reporting, each government type is expected to answer only these questions:

- Educational Services Agencies (ESAs) are asked to answer questions 1, 2, 3, 6, 8, 9, 10 and 11 in Attachment B. Therefore, only questions 1, 2, 3, 6, 8, 9, 10 and 11 in Attachment B will display for an Educational Service Agency.
- School Districts are asked to answer questions 1, 2, 3, 6, 7, 9, 10, and 11 in Attachment B.
- Townships are asked to answer questions 1, 2, 3, 9, 10, and 11 in Attachment B.
- Special Districts are asked to answer questions 1, 2, 3, 4, 5, 9, 10, and 11 in Attachment B.

As a result of these changes, the estimate of hour burden will be lower than the 2016 GUS.

6. Consequences of Less Frequent Collection

The GUS is conducted only once every five years. Anything less frequent would be insufficient to keep up with changes to the universe of governments. Changes in the universe of special districts governments, in particular, tend to be substantial over a five-year period. Less frequent collection would also greatly impair the ability of users to understand, forecast, and respond to the dynamics of governmental organization and function.

7. Special Circumstances

There are no special circumstances.

8. Consultations Outside the Agency

The notice inviting the public to comment on plans to submit this request was published in the Federal Register (Vol. 85 No. 31) on February 14, 2020 on page 8556 - 8557 (two pages). Two comments from the public were received when the comment period closed on April 14, 2020. The comments and responses are summarized below.

One comment asked whether the 2021 GUS included questions about schools and public employment that are duplicative of two other surveys, the Common Core of Data Non-fiscal Survey (NCES) and the Annual Survey of Public Employment and Payroll (Census Bureau). Data collected through the annual Common Core of Data Non-fiscal Survey, which the National Center for Education Statistics (NCES) administers, is only available for previous years which are generally 2-3 school years behind the current reference year. The Common Core of Data has variation in respondent reporting and lacks a standard survey questionnaire, which differs from the Census Bureau asking education-related questions for the 2021 GUS. Since more recent data from NCES is unavailable, it is more efficient for the Census Bureau to directly survey independent school districts and educational service agencies to obtain current information for frame maintenance. Responses elicited by these questions will allow the Census Bureau to keep up with fluctuations in the number of independent school districts, make changes to the universe of governments, and publish statistics on U.S. Governments for public consumption on the Census Bureau internet web site.

The employment question on the 2021 GUS will target about 43,000 local governments in the U.S., including independent school districts, and will ask local governments whether they have any paid employees and/or paid officials. This does not duplicate other data collection by the Census Bureau because responses to this question help the Census Bureau to identify non-employers and verify information in the government universe.

We received an additional comment which was deemed irrelevant to the collection.

Datasets measuring activity in the public sector of the economy are produced using the universe of all governments and samples drawn from the universe. Consultation with BEA, a data user of both the Census of Governments and sample data products, occurs annually, typically at the beginning of the calendar year. Analysts at BEA in past meetings have emphasized the importance of covering all entities in the public and private sectors of the economy, the importance of covering them once and only once, and in keeping the public and private sectors separate.

9. Paying Respondents

The Census Bureau will not pay respondents for providing their data nor issue gifts. The respondents are local government public officials who provide information on a voluntary basis.

10. Assurance of Confidentiality

The GUS does not collect any confidential data. Data collected are subject to provisions of Title 13, United States Code, Section 9(b) exempting data that are customarily provided in public records from rules of confidentiality. Participants in the survey will receive a letter from the Census Bureau requesting their cooperation in completing the GUS (Attachment D). This letter will include a statement informing respondents that the survey is voluntary and exempt from the rules of confidentiality. The online collection instrument, available via Centurion software, will also include statements regarding the voluntary nature of this survey and the data's exemption from the rules of confidentiality.

11. Justification for Sensitive Questions

No questions of a sensitive nature are asked.

12. Estimate of Hour Burden

The GUS is conducted every five years. There are approximately 43,454 local government unit respondents including independent school districts. We based the work hours per response on questionnaire cognitive testing conducted in preparation for the GUS. Cognitive testing included a review of the survey questions, verification of concepts asked about, and review of definitions provided to respondents to aid in answering survey questions. Testing took place over the telephone October through December 2019. The GUS is a national survey sent to local government officials. These governments differ widely in the population served and the extent and complexity of their organizations. We estimate the median public reporting burden to be 15 minutes.

The GUS respondent burden is as follows:

Respondent Burden Hours

a. Number of respondents	43,454
b. Reports annually per respondent	1
c. Total respondents	43,454
d. Estimated work hours per response	0.25
e. Estimated respondent burden hours	10,864

13. Estimate of Cost Burden

1We do not expect respondents to incur any costs other than that of their time to respond. The information requested is of the type and scope normally carried in official records and no special hardware or accounting software or system is necessary to provide answers to this information collection. Therefore, respondents are not expected to incur any capital and start-up costs or system maintenance costs in responding. Further, purchasing of outside accounting or information collection services, if performed by the respondent, is part of usual and customary business practices and not specifically required to supply information for the 2021 GUS.

14. Cost to Federal Government

The estimated cost for the 2021 GUS is projected to be \$5 million over the lifecycle of the 2022 Census of Governments.

15. Reason for Change in Burden

The decrease in respondent burden hours for the 2021 GUS is due to a smaller number of respondents, and asking respondents to answer only certain survey questions based on their type of government such as special districts.

16. Project Schedule

	Start Date	Finish Date
Data Collection	February 2021	December 2021
Data Processing	February 2021	February 2023
Product Releases	May 2023	June 2023

17. Request to Not Display Expiration Date

The OMB expiration date will be displayed in the Centurion instrument and on mail-out letters.

18. Exceptions to Certification

There are no exceptions to the certification statement.