

March 31, 2014

Jennifer Jessup  
Departmental Paperwork Clearance Officer  
Department of Commerce  
Room 6616  
14<sup>th</sup> & Constitution Avenue NW  
Washington, DC 20230

Dear Ms. Jessup:

On behalf of the Executive Committee of the Association for Budgeting & Financial Management (ABFM), I would like to express our sincere disapproval with the Proposed Information Collection for the Annual Surveys of State and Local Government Finances, as stated in *Federal Register*, Vol. 79, No. 20, dated January 30, 2014.

The following serve as our responses to the specific issues identified in the *Federal Register* notice:

*(a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility.*

ABFM represents the public finance research community, with more than 400 active members involved in academic research of state and local government finance. These members and thousands more, including practitioners, professional consultants, economists and academic faculty, utilize the Annual Survey of State and Local Government Finances as a critical source of data. Their present and future research and analysis efforts would be harmed through modification of this survey. Eliminating data elements would limit the range and scope of available research, creating significant challenges for ongoing evaluation of specific topics. I would encourage the Census to convert historical data to a more user accessible database rather than publishing it only in text files and difficult to convert tables.

*(b) The accuracy of the agency's estimate of the burden (including hours and cost) of the proposed collection of information.*

The proposed changes to information collection will reduce the amount of information collected by the survey under the auspices of achieving reduction in paperwork and respondent burden. We do not believe this justification is applicable. ABFM Executive Committee members communicated directly with state and local finance professionals responsible for responding to the Annual Surveys, and they indicated changing the survey would not impact their burden as respondents in a positive manner. To the contrary, they believe changes to reporting will increase respondent burden, requiring them to adapt established processes.

*(c) Ways to enhance the quality, utility, and clarity of the information to be collected.*

We support continued efforts of Department of Commerce and Census Bureau to convert historical data into more user-accessible databases and automated reporting, rather than publishing it only in text files and fixed tables.

*(d) Ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.*

We support continued efforts of Department of Commerce and Census Bureau working with state and local jurisdictions and reporting agencies to develop more efficient methods for collecting survey data on an annual basis. We also recognize challenges encountered by local jurisdictions making necessary technology investments (hardware and software) in order to fulfill technical aspects of reporting requirements (i.e., changes in file formats) and encourage Department of Commerce and Census Bureau to consider adopting standards enabling greater adoption of open-sourced file standards for data collection.

We appreciate the opportunity to voice our thoughts in regards to these proposed changes, and we respect and recognize the need to evaluate surveys and data gathering processes. Please let us know if we can provide any further information of significance.

Sincerely,

Dr. Charles E. Menifield  
Chair, Association for Budgeting & Financial Management  
Professor and Associate Dean for Academic Programs  
Truman School of Public Affairs  
University of Missouri