

## SUPPORTING STATEMENT

### A. Justification

#### 1. Necessity of the Information Collection

The U.S. Census Bureau requests authorization from the Office of Management and Budget (OMB) to continue conducting the American Community Survey. The Census Bureau has developed a methodology to collect and update every year demographic, social, economic, and housing data that are essentially the same as the "long-form" data that the Census Bureau traditionally has collected once a decade as part of the decennial census. Federal and state government agencies use such data to evaluate and manage federal programs and to distribute funding for various programs that include food stamp benefits, transportation dollars, and housing grants. State, county, and community governments, nonprofit organizations, businesses, and the general public use information like housing quality, income distribution, journey-to-work patterns, immigration data, and regional age distributions for decision-making and program evaluation.

In years past, the Census Bureau collected the long-form data only once every ten years, which become out of date over the course of the decade. To provide more timely data, the Census Bureau developed an alternative called the American Community Survey (ACS.) The ACS blends the strength of small area estimation with the high quality of current surveys. There is an increasing need for current data describing lower geographic detail. The ACS is now the only source of data available for small-area levels across the Nation and in Puerto Rico. In addition, there is an increased interest in obtaining data for small subpopulations such as groups within the Hispanic, Asian, and American Indian populations, the elderly, and children. The ACS provides current data throughout the decade for small areas and small subpopulations.

In its reengineering efforts for Census 2010, the Census Bureau is working to achieve a simplified census based on addressing the needs of different population groups, creating an integrated system for data capture, processing, and tabulation, and conducting early testing and evaluation to achieve operational efficiencies. Decennial census data collection efforts will now be spread throughout the decade. The operations, and the systems and technologies that support them, will be revised and improved to support a continuous data collection program.

Currently, the Census Bureau is implementing an alternative census design. The design retains a short form to conduct a census count and collect a few basic characteristics and removes the long form from the decennial census, opting instead to replace the once-a-decade long-form survey with a continuous annual survey, the American Community Survey. Given the escalating complexity of collecting data, the

separation of long-form data collection from the 2010 Census is critical. The American Community Survey achieves this goal.

The American Community Survey provides more timely information for critical economic planning by governments and the private sector. In the current information-based economy, federal, state, tribal, and local decision-makers, as well as private business and nongovernmental organizations, need current, reliable, and comparable socioeconomic data to chart the future.

The American Community Survey began providing up-to-date profiles in 2006 for areas and population groups of 65,000 or more people, providing policymakers, planners, and service providers in the public and private sectors with information every year—not just every ten years. The American Community Survey program will provide estimates annually for all states and for all medium and large cities, counties, and metropolitan areas. For smaller areas and population groups, it will take three to five years to accumulate information to provide accurate estimates. After that period of time, the multiyear average estimates will be updated annually.

Using the Master Address File (MAF) from the decennial census that is updated each year, we will select a sample of addresses, mail survey forms each month to a new group of potential households, and attempt to conduct interviews over the telephone with households that have not responded. Upon completion of the telephone follow-up, we will select a sub-sample of the remaining households, which have not responded, typically at a rate of one in three, to designate a household for a personal interview. We will also conduct interviews with a sample of residents at a sample of group quarters (GQ) facilities. Collecting these data from a new sample of HU and GQ facilities every month will not only provide more timely data but will lessen respondent burden in the decennial census.

We will release a yearly microdata file, similar to the Public Use Microdata Sample file of the Census 2000 long-form records. In addition, we will produce total population summary tabulations similar to the Census 2000 tabulations down to the block group level. The microdata files, tabulated files, and their associated documentation are available through the Internet.

In January 2005, the Census Bureau began full implementation of the American Community Survey in households by increasing the sample to approximately 250,000 residential addresses per month in the 50 states and the District of Columbia. The American Community Survey includes an annual sample of approximately 3 million households. In addition, we will select approximately 3,000 residential addresses per month in Puerto Rico and refer to the survey as the Puerto Rico Community Survey.

In January 2006, the Census Bureau implemented ACS data collection for the entire national population by including a sample of 20,000 GQ facilities and a sample of 200,000 residents living in GQ facilities in the 50 states and the District of Columbia

along with the annual household sample. A sample of 100 GQs and 1,000 residents was also selected for participation in the group quarters Puerto Rico Community Survey.

The goals of the American Community Survey are to:

- o Provide federal, state, and local governments an information base for the administration and evaluation of government programs;
- o Improve the 2010 Census; and
- o Provide data users with timely demographic, housing, social, and economic data updated every year that can be compared across states, communities, and population groups.

**a. ACS Household Data Collection**

We will continue to use the tri-modal data collection operation already in place for household (HU) ACS operations. The first mode, mail, includes mailing a pre-notice letter (Attachment A) alerting residents that they will receive the ACS questionnaire in a few days and encouraging them to return the questionnaire promptly. The letter then explains the purpose of the ACS and how the data are used.

The next mailing is the initial questionnaire package that includes a cover letter, the questionnaire, an instruction guide, a brochure, and a return envelope (Attachment B.) The cover of the questionnaire includes information on how to obtain assistance in English and Spanish. The questionnaire includes questions about the HU and the people living in the HU. The paper questionnaire has space to collect detailed information for five people in the household.

The third mailing is a postcard (Attachment C) that reminds respondents to return their questionnaires and thanks them if they have already done so. The last mailing is sent only to those sample addresses from which the initial questionnaire has not been returned within three weeks. The content is the same as the initial questionnaire package, except that it contains a different cover letter. The final cover letter with this questionnaire package reminds the household of the importance of the ACS, and asks them to respond soon (Attachment D.)

The second mode of data collection is computer-assisted telephone interviewing (CATI) to conduct telephone interviews for all households that do not respond by mail and for which we are able to obtain telephone numbers. The third mode of data collection is computer-assisted personal interviewing (CAPI) to conduct personal interviews for a sample of addresses for which we have not obtained a mail or CATI interview. Both CATI and CAPI instruments are available to

interviewers in English and Spanish (Attachment E.) We will also conduct a CAPI-only operation to collect ACS data from sampled HUs in remote Alaska.

We will provide telephone questionnaire assistance (TQA) for respondents who need assistance with completing the paper questionnaire, who have questions about the survey or who would like to complete the ACS interview over the telephone instead of by other means. Respondents may call the ACS toll free TQA numbers listed on various ACS mail materials. The TQA staff answer respondent questions and/or complete the entire ACS interview using computer-assisted telephone interviewing (CATI). Households requiring a survey form in Spanish (Attachment F) can request it by calling our TQA center. For Puerto Rico households, we will mail a Spanish version of the questionnaire. An English version of the Puerto Rico Community Survey (Attachment G) can also be requested through TQA.

We will conduct a CATI Failed Edit Follow-up (FEFU) if we have a telephone number and 1) respondents omit answering a set of critical questions that are deemed essential for the questionnaire to be considered complete, or 2) the household has more than five people. We will call to obtain information for the additional members of the household. This is an operation designed to capture information missing from the paper questionnaires. Follow-up by telephone occurs for households with six or more people. The FEFU instrument (Attachment H) is available to interviewers in both English and Spanish.

We will also collect information from HUs that are identified as vacant. We will ask a knowledgeable contact to answer the housing questions on the ACS questionnaire along with some additional questions for these units. Questions asked on the ACS household CATI and CAPI instrument that are worded differently and those asked in addition to the questions on the household ACS questionnaire are included in Attachment I.

We will conduct a reinterview operation to monitor FR performance. Only households that provide an interview via CAPI are eligible for this reinterview. For the household reinterview operation, we will use a separate set of questions for units that were identified as occupied, vacant, and noninterview at the time of the original CAPI. The household ACS Reinterview questions are included in Attachment J.

CAPI interviewers have several tools available for use with households that speak a language other than English to explain the ACS, including an introductory letter, a thank you postcard, a short explanatory brochure, and a longer brochure in question and answer format (Attachment K). Each of these materials is available in Spanish, Russian, Simplified Chinese, Vietnamese, and Korean. The Census Bureau is working toward translating these materials into additional languages, and working toward translating other materials that explain the ACS in

these languages that would be used in the CATI and mail data collection modes.

#### **b. ACS Group Quarters Data Collection**

In addition to selecting a sample of residential addresses, we will select a sample of group quarters (GQs). The Field Representatives (FRs) use the CAPI Group Quarters Facility questionnaire (GQFQ) in English or Spanish when making initial telephone contact to schedule an appointment to conduct a personal visit at the sample GQ and also to generate the sub-sample of persons for ACS interviews (Attachment L.) An introductory letter (Attachment M) is mailed to the sample GQ approximately two weeks prior to the period when an FR may begin making contact with the GQ.

At the time of the GQ personal visit, FRs will continue to use the GQFQ and also a GQ listing sheet to select a small sample of people to interview within the GQs. The Spanish GQFQ instrument will be used for ACS data collection at Puerto Rico GQs.

We will use a subset of the ACS HU questions to conduct interviews with sample residents in GQs. Bi-lingual paper questionnaires are used to conduct personal interviews with sampled GQ residents. The GQ questionnaires contain questions for one person. The GQ resident data collection packages include an introductory letter, a bilingual Privacy Act Notice, a paper questionnaire, and a copy of the ACS GQ FAQ brochure (Attachment N.) For Puerto Rico sample GQ residents, we will use PR data collection packages (Attachment O) to collect the GQ data. We will also conduct a separate operation to collect ACS GQ data from sampled GQs in remote Alaska.

We will also conduct a GQ reinterview (RI) operation to monitor the performance of FRs in conducting the GQFQ interviews. For the GQ RI operation, we will use a separate set of questions to verify and monitor the FR interviews at the GQ level (Attachment P.)

We are developing a CAPI ACS GQ instrument so that the questions asked of GQ residents are GQ type-specific. This instrument is expected to be available for use in the field beginning in January 2009. The CAPI ACS GQ will be available to the FRs in English and Spanish. This new instrument will reduce data collection costs and respondent burden for residents sampled in most GQ types.

#### **c. Changes in ACS Content for 2008**

For the 2008 ACS, we will use modified data collection materials based upon results of the 2006 ACS Content Test. The content of the 2008 American Community Survey questionnaire and data collection instruments for both residential and group quarters operations reflect 2006 tested changes to content,

instructions, and forms design. These survey instruments will also include changes based on wording, format and instructions of the 2010 Census form for gender, age, relationship, race, Hispanic origin, and tenure.

The 2006 ACS Content Test included federal agency stakeholder input to determine test content, cognitive laboratory pre-testing, expert reviews, and other methods to develop alternative versions of test questions. A national sample field test of approximately 60,000 household addresses was selected to conduct the 2006 ACS Content Test. Eleven of 25 existing ACS housing questions, 15 of the existing population questions, and 3 new population questions were tested. Analysis of test results and recommendations for new and revised content for the ACS took place from mid-2006 through March 2007. For reports that provide a full description of the overall 2006 ACS Content Test and topic-specific research objectives, methodology, and empirical results, see the Census Bureau website at [http://www.census.gov/acs/www/AdvMeth/content\\_test/content\\_test\\_06.htm](http://www.census.gov/acs/www/AdvMeth/content_test/content_test_06.htm).

The 2006 ACS Content Test resulted in a Census Bureau recommendation to OMB to modify twelve (seven housing and five population) question series on the ACS. The modified housing questions are: Year Structure Built, Value of Property, Number of Rooms, Number of Bedrooms, Kitchen Facilities, Plumbing Facilities, and Telephone Service Availability, and Food Stamp Benefit. The modified population questions are: School Enrollment, Educational Attainment, Residence 1 Year Ago, Disability, and Labor Force Status.

Two ACS questions, veteran years of military service and seasonal residence, will no longer be included in the ACS. The VA has determined that these data are no longer needed annually at small geographic areas. The seasonal residence question was included in the ACS for the Census Bureau to evaluate seasonality effects. We now have enough data and do not need to continue this data collection.

The Census Bureau proposes including three new subjects on the ACS: health insurance coverage, marital history, and veteran's service-connected disability ratings.

We are beginning the once-a-decade process of confirming the statutory basis of each question on the ACS. We will be seeking documentation and confirmation from other Federal agencies to ensure that every ACS question is fully justified and that data are needed annually at small geographic areas. This documentation will be submitted to Congress by March 31, 2008, as required by statute, and to OMB and the public as well.

The Census Bureau is collecting these data under authority of Title 13, United States

Code, Sections 141, 193, and 221.

## **2. Needs and Uses**

The primary need for continued full implementation of the American Community Survey is to provide comparable data at the census tract level. These data are needed by federal agencies and others to provide assurance of long-form type data availability since eliminating the long form from the 2010 Census.

State and local governments are becoming more involved in administering and evaluating programs traditionally controlled by the federal government. This devolution of responsibility is often accompanied by federal funding through block grants. The data collected via the American Community Survey will be useful not only to the federal agencies but also to state, local, and tribal governments in planning, administering, and evaluating programs.

The American Community Survey provides more timely data for use in area estimation models that provide estimates of various concepts for small geographic areas. In essence, detailed data from national household and group quarters surveys (whose samples are too small to provide reliable estimates for states or localities) can be combined with data from the American Community Survey to create reliable estimates for small geographic areas.

We will also continue to examine the operational issues, research the data quality, collect cost information, evaluate telephone look-up procedures, and make recommendations in the future for yearly data collection for a rolling sample of addresses. Data users can use information from this survey to help evaluate the ACS program and to give feedback to the Census Bureau to help in our evaluation.

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 of 1995.

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

We will use CATI and CAPI technologies for collecting data from nonresponding households for the American Community Survey. These technologies allow us to skip past questions that may be inappropriate for a person/household, which, in turn, will keep respondent burden to a minimum. We will use CAPI technologies for collecting information from group quarters facilities to accurately classify the GQs by type and to generate a sample of residents at the GQs. We will also use CAPI technologies for both the HU and GQ Reinterview operations.

In 2009, we plan additional automation by implementing a CAPI ACS GQ data collection instrument that will reduce the time for an FR to conduct both the GQFQ and ACS GQ data collection as well as reduce the amount of paper materials currently needed for this operation.

#### **4. Efforts To Identify Duplication**

The American Community Survey is the instrument used to collect long-form data that has traditionally been collected only during the decennial census. The content of the American Community Survey reflects topics that the Congress and the OMB have approved the Census Bureau to collect. A number of questions in the American Community Survey appear in other demographic surveys, but the comprehensive set of questions, coupled with the tabulation and dissemination of data for small geographic areas, does not duplicate any other single information collection.

In addition, the Interagency Committee for the ACS, co-chaired by OMB and the Census Bureau, includes more than 30 participating agencies and meets periodically to examine and review ACS content. This committee provides an extra safeguard to ensure that other agencies are aware of the ACS content and do not duplicate its collection and content with other surveys.

#### **5. Minimizing Burden**

Research and data from survey administrators indicates that the ACS HU questionnaire takes an estimated 38 minutes to complete. The GQFQ takes an estimated 10 minutes to complete and the ACS GQ questionnaire takes approximately 25 minutes to complete. Every effort is taken to minimize the time needed for respondents or GQ contacts to answer the questions for all ACS data collection operations.

#### **6. Consequences of Less Frequent Collection**

A less frequent data collection plan would preclude the Census Bureau's goal of producing data annually in order to examine year-to-year changes in estimates. The American Community Survey is conducted monthly because we need to collect data every month for developing an annual average. A monthly survey also helps us stabilize workloads across the year for CATI and CAPI operations and observe seasonal changes that occur.

#### **7. Special Circumstances**

The Census Bureau will collect these data in a manner consistent with the OMB guidelines.



## **8. Consultations Outside the Agency**

The content of the American Community Survey is a result of extensive consultation during meetings with the Interagency Committee for the ACS, advisory committees, and other federal agencies.

In addition, we have met with the following people to discuss our plans:

Ron Sapanik, Department of Housing and Urban Development  
Phone: (202) 708-1060 x 5887

Marilyn Seastrom, National Center for Education Statistics  
Phone: (202) 502-7303

Jennifer Madans, National Center for Health Statistic  
Phone: (301) 458-4500

Joe Salvo, New York City Department of Planning  
Phone: (212) 720-3434

Don Ollerich, Department of Health and Human Services  
Phone: (202) 690-8410

We published a notice in the [Federal Register](#) on January 4, 2007, inviting the public and other federal agencies to comment on our plans to submit this request. We received letters in support of the ACS from the Bureau of Economic Analysis, and the Brookings Institute. The Census Bureau received one other letter expressing comments about the 2008 ACS plans. Copies of the letters and our response are included in Attachment Q.

## **9. Paying Respondents**

We do not pay respondents or provide respondents with gifts.

## **10. Assurance of Confidentiality**

The Census Bureau collects data for this survey under Title 13, United States Code, Sections 141, 193, and 221. All data are afforded confidential treatment under Section 9 of that Title.

In accordance with Title 13, each household, GQ administrator, and each person within a GQ participating in the ACS will be assured of the confidentiality of their answers. A brochure is sent to sample households with the initial questionnaire mail package and contains this assurance. The brochure mailed to sample GQs with the GQ introductory letter contains assurances of confidentiality. It is also provided to sample GQ residents

at the time of interview.

Household members, GQ administrators or GQ residents may ask for additional information at the time of interview. A Question and Answer Guide, and a Privacy Act Notice are provided to respondents, as appropriate. These materials explain Census Bureau confidentiality regulations and standards.

At the beginning of follow-up interviews (CATI and CAPI), the interviewer will explain the confidentiality of data collected and that participation is required by law. For all CAPI interviews, the interviewer will also give the household respondent, GQ administrator, or GQ resident a copy of a letter from the Census Bureau Director explaining the confidentiality of all information provided.

## **11. Justification for Sensitive Questions**

Some of the data we collect, such as race and sources of income and assets, may be considered to be of a sensitive nature. The Census Bureau takes the position that the collection of these types of data is necessary for the analysis of important policy and program issues and has structured the questions to lessen their sensitivity. We have also provided guidance to the CATI and the CAPI interviewers on how to ask these types of questions during the interview.

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

We plan to mail questionnaires to approximately 250,000 households each month during the period January 2008 – December 2010. The Census Bureau estimates that, for the average household, the ACS-1 will take 38 minutes to complete, including the time for reviewing the instructions and answers. We plan to conduct reinterviews for approximately 2,900 households each month. We estimate that the average time for a reinterview will be 10 minutes.

We plan to conduct personal interviews at 1,667 GQs each month during the period from January 2008 – December 2010. At each facility, one GQ contact will be interviewed to collect data about the GQ and to provide a list of residents in the GQ. This list will be used to randomly select the sample of individuals to complete the ACS. The estimated time for each interview is 15 minutes. We plan to conduct interviews with approximately 17,000 people in GQs each month. The estimated response time for each person to complete the ACS-1(GQ) is 25 minutes. We also plan to conduct GQ reinterviews for approximately 166 GQs each month during this period. We estimate that the average time for a GQ reinterview will be 10 minutes.

We have based these estimates of the average length of time on our previous American Community Survey tests and on experiences with forms of comparable lengths used in previous censuses and tests. Therefore, the total number of respondent burden hours each year is 1,994,500 hours. Total burden hours for this study are estimated to be

5,983,500. See Table 1 on the following page for the detailed respondent and burden hour estimates.

**Table 1. 2008-2010 American Community Survey Respondent and Burden Hour Estimates**

<b>Data Collection Operation</b>	<b>Forms or Instrument Used in Data Collection</b>	<b>Annual Estimated Number of Respondents</b>	<b>Estimated Minutes Per Respondent by Data Collection Activity</b>	<b>Annual Estimated Burden Hours</b>	<b>Estimated Burden Hours for Clearance Period 2008 – 2010</b>
<b>I.</b> ACS Household Questionnaire - Paper Mailout/Mailback	ACS-1, ACS 1(SP), ACS-1PR, ACS-1PR(SP)	3,000,000	38	1,900,000	5,700,000
<i>ACS Household CATI - Telephone Non-response Follow-up</i>	<i>CATI HU</i>	<i>[1,200,000 included in I.]</i>	<i>[38]</i>	<i>[760,000 included in I.]</i>	<i>[2,280,000 included in I.]</i>
<i>ACS Household CAPI – Personal Visit Non-response Follow-up</i>	<i>CAPI HU</i>	<i>[540,000 included in I.]</i>	<i>[38]</i>	<i>[342,000 included in I.]</i>	<i>[1,026,000 included in I.]</i>
<b>II.</b> ACS Group Quarters Facility Questionnaire CAPI - Telephone and Personal Visit	CAPI GQFQ	20,000	15	5,000	15,000
<b>III.</b> ACS Group Quarters Questionnaire – Paper Personal Interview, Telephone or Self-response	ACS-1(GQ), ACS-1(GQ)(PR)	200,000	25	83,333	249,999
<b>IV.</b> ACS Household Reinterview – CATI/CAPI	ACS HU-RI	35,000	10	5,833	17,499
<b>V.</b> ACS Group Quarters GQ-level Reinterview – CATI/CAPI	ACS GQ-RI	2,000	10	334	1,002
<b>TOTALS</b>		<b>3,257,000</b>	<b>N/A</b>	<b>1,994,500</b>	<b>5,983,500</b>

**13. Estimate of Cost Burden**

There are no costs to the respondent other than his/her time to respond to the survey.

**14. Cost to Federal Government**

As requested in the FY08 Presidents Budget, the estimated cost of the 2008 American Community Survey is approximately \$187 million. Census Bureau will pay the total cost of the American Community Survey.

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

The 2008-2010 American Community Survey represents a data collection effort in every part of the United States and also in Puerto Rico. The burden is increasing by 77,090 hours from the 2005-2007 submission due to more precision in the group quarters data collection and reinterview burden estimate. This estimate is based on the first year (2006) of full implementation of the ACS that included both household (HU) and GQ data collection, HU non-response follow up, and both HU and GQ reinterview operations.

## **16. Project Schedule**

Data collection activities for the 2008 - 2010 American Community Survey are scheduled to begin for households and for group quarters residents in January 2008. Final ACS data collection for this period is the end of December 2010 for households and mid-January 2011 for group quarters.

Approximately one month after the initial mailing for a sample month, we will begin the CATI operation for households, which have not responded by mail. Approximately two months after the initial mailing, we will begin a field follow-up operation using CAPI for a sample of the remaining nonresponse households.

Each month, we will begin interviews with sample GQ administrators and a sample of residents. The data collection for each GQ sample month is six-weeks. The GQ reinterview takes place approximately one month after the beginning of the survey year and continues until the end of the December each year. The ACS GQ does not include a formal non-response follow up operation, but FRs contact a respondent or GQ administrator for missing responses on the questionnaire at any point during the six-week data collection period.

Every August we plan to release data for the previous calendar year. The data releases will include data collected from HUs and GQs.

## **17. Request To Not Display Expiration Date**

We request that we not display the OMB expiration date on the questionnaire. The American Community Survey is an ongoing and continuous survey that is mandatory. If there is an expiration date on the questionnaire, respondents may infer that the survey is over as of the expiration date, which is not the case.

## **18. Exceptions to the Certification**

There are no exceptions to the Certification for Paperwork Reduction Act Submission.