

**SUPPORTING STATEMENT FOR
RACE & ETHNICITY COLLECTION SYSTEM (RECS) QUALITATIVE RESEARCH**

OMB No. 0960-NEW

A. Justification

1. Authorizing Laws and Regulations

Currently, the Social Security Administration (SSA) has no reliable, statistically valid means of capturing race/ethnicity data as part of our core business process. While some race/ethnicity data is collected by Form SS-5, the Application for Social Security Card, it is not provided to SSA through other means of enumerating individuals; e.g., the Enumeration at Birth and Enumeration at Entry processes. Additionally, it is not collected during the disability application process.

Since SSA does not routinely collect race/ethnicity data, we are at a disadvantage in several areas. Specifically, we are limited in the following: analyzing programs' demographic composition; assessing the different ways various racial and ethnic groups are impacted by our programs; responding to allegations of bias in the benefit decision-making process; and ensuring that decisions are bias-free.

To redress the above deficiencies, SSA plans to begin implementing Race/Ethnicity Collection Systems (RECS)/questions to several of its applications and processes. The questions will be written in compliance with OMB standards for race/ethnicity data. The responses will only be used for statistical research purposes to ensure the Social Security claims process is being conducted in a fair and equitable manner. In no way will the information be used in determining the applicant's eligibility or entitlement to a Social Security benefit.

Because of the sensitive nature of race/ethnicity questions, before we actually implement them we plan to conduct several voluntary focus groups with members of the public to assess their opinions, reactions and recommendations to the proposed questions. The focus groups will be conducted under the authority of *Section 1110 a-b of the Social Security Act*.

Please note that this Information Collection Request (ICR) is **only** for the focus groups. After these focus groups have been conducted and the results are analyzed, SSA will submit a separate ICR for the actual RECS questions.

2. How, by Whom, and for What Purpose the Information is to be Used

To assess 1) how members of the public may respond to the planned race/ethnicity questions, 2) whether there are improvements which could be made to the way the questions are worded, and 3) the potential impact of these questions on the claims interview and application processes, SSA will conduct eight qualitative focus groups with members of the public. The focus groups' composition will be diverse in terms of gender and age. Compensation will be provided to

participants. The average compensation amount will be \$60, although there may be some variation depending on transportation costs for the different focus groups. In the past, we have paid both more than and less than this amount. When developing a compensation amount, we take into consideration such factors as the transportation/commuting costs, the cost of living in the recruitment area, and how much individuals expect to receive (the "market rate") for participating in early evening/late night sessions. If the incentive is too low, we may have difficulty recruiting a sufficient number and diversity of participants.

The breakdown of the focus groups is as follows: four sessions will be conducted in English with people who consider themselves to be Caucasian/White; two sessions will be conducted in English with people who consider themselves Asian-American, African-American, American Indian, or another non-Caucasian/White race; and two sessions will be conducted in Spanish only with persons who self-identify as Hispanic/Latino.

The focus groups will be moderated by an SSA contractor, ORC/Macro International. The moderators will recommend which cities to hold the focus groups in based on which locations would offer optimal opportunities to recruit people from the target populations. During the focus group sessions, the moderators will share copies of the proposed race/ethnicity questions and accompanying fact sheets with the participants and assess their reaction to them. They will also lead guided discussions using the topics below:

- What is the overall reaction to these questions?
- What is the public's experience providing race and ethnicity information to government agencies or businesses?
- What concerns are they likely to have about the collection of this information?
- What questions will the public raise about the information collection process?
- What do people find objectionable about the information collection process?
- In what manner can the interview be conducted that reduces or eliminates these objections?
- How satisfactory does the proposed new information collection form containing the race/ethnicity questions (SSA-108) function?
- Are the race/ethnicity categories clearly defined?
- Does the form clearly explain why Social Security is collecting race and ethnicity information?
- Do people believe this explanation?
- Do people understand the Privacy Act notice?
- Do people understand that providing the information is voluntary?
- Do people believe that they will not be penalized if they choose to not provide the information (i.e., it will not affect the decision on their benefit application)?

3. Use of Information Technology to Collect the Information.

Since by their nature focus groups must be conducted in person, this information collection will not be available in electronic form.

4. Duplication of Information

The nature of the information being collected and the manner in which it is collected preclude duplication. There is no other collection instrument used by SSA that collects data similar to that collected here.

5. Impact on Small Businesses

This collection does not impact small businesses or other small entities.

6. Consequence of Not Collecting Information/Collecting Less Frequently

If SSA did not conduct this information collection, we would have no means of assessing how the public perceives a very important and potentially sensitive new information collection. Since the information will only be collected once from each type of focus group participant, it cannot be collected less frequently.

There are no technical or legal obstacles that prevent burden reduction.

7. Special Circumstances

There are no special circumstances that would cause this information collection to be conducted in a manner inconsistent with 5 CFR 1320.5.

8. Federal Register Notices/Consultation with Members of the Public

The advance 60-day Federal Register Notice for this information collection was published on August 6, 2007, at 72 FR 43674, and no public comments were received. The 30-day Federal Register Notice was published on October 10, 2007, at 72 FR 57629. We will forward any public comments we receive in response to this Notice to OMB.

There have been no outside consultations with members of the public.

9. Payment or Gifts to Respondents

Respondents will be compensated for their time and transportation costs. Payment will not exceed \$75, which is standard for focus groups similar to those we are conducting.

10. Assurances of Confidentiality

The information requested is protected and held confidential in accordance with 42 U.S.C. 1306, 20 CFR 401 and 402, 5 U.S.C. 552 (Freedom of Information Act), 5 U.S.C. 552a (Privacy Act of 1974), and OMB Circular No. A-130.

11. Justification for Sensitive Questions

The information collection does not contain any questions of a sensitive nature.

12. Estimates of Public Reporting Burden

SSA plans to conduct 8 focus groups with 12 participants per group, for a total of 96 respondents. Each focus group will take an estimated 90 minutes, so the annual burden is 144 hours. The total burden is reflected as burden hours, and no separate cost burden has been calculated.

13. Cost to the Respondents

There is no known cost burden to the respondents.

14. Annual Cost to the Federal Government

The cost to the Federal Government for conducting these one-time focus groups is approximately \$85,000. This estimate is a projection of the costs for conducting eight focus groups and includes drafting and preparing the discussion guide, recruiting participants, facility rental, and drafting and preparing the final report.

15. Changes to the Public Reporting Burden

This is a new, one-time information collection which will increase the public reporting burden by 144 hours.

16. Publication of the Information Collection Results

The results of the information collection will not be published. Results will be for internal use only.

17. Exemption from the Requirement to Display the Expiration Date

SSA is not requesting an exception to the requirement to display an expiration date.

18. Certification Requirements

SSA is not requesting an exception to the certification requirements at 5 CFR 1320.9 and related provisions at 5 CFR 1320.8(b)(3).

B. Collections of Information Employing Statistical Methods

Statistical methods are not used for this information collection.