

**SUPPORTING STATEMENT – PART A**  
**U.S. Department of Commerce**  
**U.S. Census Bureau**  
**2008 Survey of Compact of Free Association (COFA) Migrants**  
**OMB Control No. 0607-XXXX**

**1. Necessity of the Information Collection**

The U.S. Census Bureau is requesting approval to conduct a survey of the residents of Guam and the Commonwealth of the Northern Mariana Islands (CNMI) as a means to estimate the stock of qualified nonimmigrants (also referred to as Compact of Free Association (COFA) migrants) from the Republic of the Marshall Islands, the Federated States of Micronesia, and the Republic of Palau in 2008<sup>1</sup>.

COFA is a joint congressional-executive agreement that states that the U.S. will provide funds to Guam, CNMI, Hawaii and American Samoa for a range of development programs and other benefits that are necessary due to the in-migration of citizens from the Republic of the Marshall Islands, the Federated States of Micronesia, and the Republic of Palau. COFA became effective for citizens of the Republic of the Marshall Islands and the Federated States of Micronesia in 1986, and for citizens of the Republic of Palau in 1994.

The COFA Amendments Act of 2003 introduced the requirement for an enumeration of COFA migrants to be conducted no less frequently than every five years in Guam, CNMI, Hawaii and American Samoa. In accordance with the COFA Amendments Act of 2003, the Office of the Insular Affairs of the U.S. Department of the Interior requested the U.S. Census Bureau to produce estimates of such COFA migrants for 2008.

**2. Need and Uses**

The COFA Amendments Act of 2003 stipulates that \$30,000,000 will be made available for grants to help defray the costs to jurisdictions whose health, educational, social, or public safety services are affected by the increase in COFA migrants from the Republic of the Marshall Islands, the Federated States of Micronesia and the Republic of Palau. To assist in the distribution of funds, an enumeration of the jurisdictions that are affected must be done no less frequently than every five years.

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<sup>1</sup> According to the COFA Amendments Act of 2003, a qualified nonimmigrant (COFA migrant) is defined as "...a person, or their children under the age of 18, admitted or resident pursuant to section 141 of the US-RMI or US-FSM Compact or section 141 of the Palau Compact who, as of a date referenced in the most recently published enumeration is a resident of an affected jurisdiction." (Public Law 108-188, Sec. 104 (e) (2) (B)).

The proposed survey will collect data on place of birth, age, date of birth, sex and year of entry for COFA migrants residing in Guam and CNMI. Only questions pertaining to the needs of the legislation will be asked. The questionnaire content and data collection procedures will generally follow the American Community Survey (ACS) and Census 2000 procedures. Since data can be obtained for Hawaii from the ACS, it is not cost-effective to include Hawaii in the survey. Because it would be cost prohibitive to design a survey resulting in reliable estimates of the small number of COFA migrants in American Samoa, the estimate for this area will be derived from existing Census 2000 data.

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.

### **Government Users**

The jurisdictions outlined in Public Law 108-188 are American Samoa, Guam, the Commonwealth of the Northern Mariana Islands and the State of Hawaii as areas that are to receive funds as part of the Compact of Free Association Amendments Act of 2003.

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

The mode of data collection will be in-person interviews using paper forms, limiting the use of information technology. The cost of using information technology is not justified because of the limited amount of data to be collected and processed.

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

The information collected in the 2008 Survey of Compact of Free Association (COFA) Migrants is unduplicated. Currently, there are no existing data sources that collect information on COFA migrants residing in Guam and CNMI for the relevant year needed to produce estimates.

### **5. Minimizing Burden**

To minimize burden, existing data sources such as the ACS and Census 2000 are used to estimate the number of COFA migrants from the Republic of the Marshall Islands, the Federated States of Micronesia, and the Republic of Palau living in Hawaii and American Samoa respectively. Without similar data readily available in Guam and the Commonwealth of Northern Mariana Islands, it is necessary to conduct independent surveys in these jurisdictions to obtain the information to fulfill the required enumeration. Only those questions that meet the needs of the

law and allow for the identification of duplication or falsification are included in the survey.

**6. Consequences of Less Frequent Collection**

The COFA Amendments Act of 2003 stipulates that the qualified nonimmigrant population has to be enumerated no less frequently than every five years; thereby requiring recently collected data to be available to serve as a basis for the estimate of these populations.

**7. Special Circumstances**

This information collection will be conducted in a manner consistent with the Office of Management and Budget (OMB) guidelines and there are no special circumstances.

**8. Consultations Outside the Agency**

On March 18, 2008, the Census Bureau published a notice in the Federal Register (Vol 73, pages 14421-2) inviting the general public and other Federal agencies to comment on the necessity, content and scope of the data collection plans. We received no comments during the comment period.

In addition, the Census Bureau has met with staff from the Department of Interior's Insular Affairs Office on several occasions to discuss the content and methodology to be used to fulfill the requirements outlined in the Compact of Free Association Act Amendments of 2003.

The Census Bureau also met with staff of the House Subcommittee on Insular Affairs on May 13, 2008 to discuss the proposed methodology for collecting data in Guam and CNMI.

**9. Paying Respondents**

No payments or gifts are given to respondents of the survey.

**10. Assurance of Confidentiality**

The Census Bureau has the authority to offer confidentiality to respondents under Title 13 U.S.C. The privacy notice (see Attachment 1) and the introductory respondent letter (see Attachment 2) inform the respondent that personal information, such as names and addresses, will not be disclosed. A similar reminder of confidentiality is included in the notice of visit letter (see Attachment 3) for households where no respondents are home during the time an interviewer visits. Surveys may be seen only by persons sworn to uphold the confidentiality of the Census Bureau information and may be used only for statistical purposes.

**11. Justification for Sensitive Questions**

The survey does not include questions of a sensitive nature.

**12. Estimate of Hour Burden**

The Census Bureau expects a sample size of 5,300 households who will be interviewed for the survey (see Attachment 4). The Census Bureau estimates that the questionnaire will require 17 minutes to complete for the average household in Guam and CNMI. Reinterviews for quality control purposes will be conducted for approximately 500 cases (see Attachment 5). Reinterviews should take no more than 5 minutes. Burden for the entire operation is estimated to be 1,544 hours.

**13. Estimated Cost to Respondents**

There is no cost to respondents other than their time to complete the survey.

**14. Costs to the Federal Government**

The cost for the 2008 Survey of Compact of Free Association (COFA) Migrants conducted in Guam and the Commonwealth of the Northern Mariana Islands is projected to be approximately \$1,300,000, funded by the Office of Insular Affairs, US Department of the Interior.

**15. Reason for Change in Burden**

This is a new data collection.

**16. Project Schedule**

July 11, 2008	Survey materials approved by Sponsor
August 8, 2008	Field materials finalized
September 9, 2008	Training completed
September 16, 2008	Fieldwork begins
October 13, 2008	Fieldwork completed
December 8, 2008	Data processing completed
February 9, 2009	Final tables/report approved by Sponsor

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

The expiration date will appear in the respondent letter given to all households at the commencement of the survey.

**18. Exceptions to the Certification**

The collection of information for the survey complies with 5 CFR 1320.9 without exception.