#### A. Justification

# 1. <u>Necessity of Information Collection</u>

The U.S. Census Bureau plans to extend for an additional three years its generic clearance to conduct customer/product-based research. This extension will allow us to continue to use customer satisfaction surveys, personal interviews, or focus group research to effectively improve and make more customer-oriented programs, products, and services.

Extended clearance for data collections would continue to cover customer/program-based research for any Census Bureau program area that needs to measure customer needs, uses, and preferences for statistical information and services. The customer base includes, but is not limited to previous, existing, and potential businesses and organizations, alternate Census Bureau data disseminators like State Data Centers, Business and Industry Data Centers, Census Information Centers, Federal or Census Depository Libraries, educational institutions, and not-for-profit or other organizations.

The Census Bureau used the generic clearance 18 times over the past three years to conduct customer satisfaction surveys. Attachment A lists the programs and products that were measured using this mechanism.

Data collection for this project is authorized under Executive Order 12862.

#### Generic Clearance Procedures

The Census Bureau's Forms Clearance Officer and the Customer Liaison and Marketing Services Office (CLMSO) jointly administer the generic clearance. Census Bureau offices requiring customer and/or product-based research contact the CLMSO to help them determine the best strategy for fulfilling their information needs and then develop an appropriate collection mechanism, ensuring conformance with OMB requirements and Census Bureau strategic goals and objectives and to avert duplication or repetitive data collection. CLMSO also assists in the preparation of supporting documentation which, together with draft research documents are submitted to OMB for review two weeks in advance of any information collection activity. The Forms Clearance Officer approves and forwards this documentation to the OMB.

The CLMSO also prepares an annual report to OMB fully describing work done under the generic clearance, including:

- descriptions of individual research conducted
- numbers of respondents and respondent burden hours used
- dates of each survey
- individual and aggregated costs of surveys
- individual summaries of results and program/product decisions that were made based upon customer responses and feedback

### 2. Needs and Uses

Information collected from customer research helps the Census Bureau to measure its customer base—their use, satisfaction, and preferences for existing and future programs, products and services.

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.

## 3. Efforts to Minimize Burden

To limit respondent burden, survey samples are carefully developed. Samples are focused to specific program, product, or product-line customers, data users, distributors, or statistical information colleagues. Likewise, research questions are limited to specific issues that relate to a specific program, product, or objective.

The CLMSO provides guidance and coordination in the design and focus of studies. It assists its internal customers in constructing research platforms and documents that will provide optimum structure and information feedback so the Census Bureau can align its programs and products to its customer base. Approaches to questions asked are thoroughly discussed and reviewed to limit the number of questions posed, and to also fine-tune and pinpoint exactly what is to be measured and to anticipate what answers to specific questions might mean or results expected by the researching office.

Electronic surveys have become more commonplace in the research industry in general and are proving to be both time- and cost-efficient to develop and to tabulate. However, the Census Bureau acknowledges that some customer segments still require printed and mailed documents. Therefore, to ensure our customer base is truly reflected in research results and feedback, in addition to offering an on-line response, sometimes we mail out survey forms and then key mail-in responses to our survey management software.

## 4. <u>Efforts to Identify Duplication</u>

Research questions relate specifically to Census Bureau programs, products, and services and do not duplicate what other agencies are doing. The Forms Clearance Officer and the CLMSO staff ensure that research does not involve duplicate efforts.

The CLMSO catalogues Census Bureau customer and product-based research. It publishes results to appropriate offices throughout the Census Bureau and shares its findings with counterparts in other governmental agencies. Research results are publicized in internal information sharing presentations and posted on the CLMSO's Intranet site for Census Bureau access. Secondary research is used when possible as a

preliminary guide for generic program and product issues. However, specific initiatives and issues require explicit feedback from the Census Bureau's own customer base.

# 5. <u>Minimizing Burden on Small Businesses</u>

Small businesses are not specific targets of the Census Bureau's customer research efforts. However, if they appear among the our customer base they may be asked to participate in a given study. We ensure that research questions are not redundant and include only requests for information relevant to their program/product use, satisfaction, and preference.

### 6. <u>Consequences of Less Frequent Collection</u>

This clearance involves one-time questionnaire development activities. Follow-up research activities may be conducted as needed to measure changes over time.

## 7. <u>Consistency with OMB Guidelines</u>

The Census Bureau collects the information in a manner that complies with OMB guidelines.

# 8. <u>Consultation Outside the Agency</u>

The Census Bureau confers with its statistical information provider counterparts to confirm research designs are statistically sound and user-friendly. Questionnaires and other documents are tested for user-friendliness and clarity by colleagues and a small beta-test sample of the proposed recipient universe.

The Census Bureau exchanges information about customer-based activities and research with its various internationally-based counterparts, other Federal agencies, professional associations, advisors, and others to help refine research in keeping with effective current trends and techniques.

The Census Bureau published a pre-submission notice in the *Federal Register* on May 7, 2007 on page 25740. We received one comment which we deemed irrelevant to the collection.

# 9. <u>Paying Respondents</u>

The Census Bureau has not traditionally provided payment or other forms of remuneration to respondents of its various forms of customer satisfaction research. Focus group studies are the exception.

In the case of focus groups, we will be providing stipends in the standard range of \$50-\$75. If focus groups include hard-to-reach groups and we plan to offer non-standard stipends, we will provide OMB with additional justifications in the request for clearance

of these specific activities.

# 10. <u>Assurance of Confidentiality</u>

Introductory remarks, scripts, paragraphs, or transmittal letters are included in the Census Bureau's research. The remarks, scripts, paragraphs, and letters explain the purpose of the research and state that participation is voluntary and that responses will be kept confidential and will be used only in aggregate form.

Inherent in the Census Bureau's responsibilities to collect and publish statistics under the authority of Title 13, United States Code, is the need to seek information from the public on how the Census Bureau is performing. In order to fulfill its responsibilities under Title 13 to provide high quality, relevant, and accurate information, the Census Bureau must seek responses from the public about the usefulness of its products. Consequently, seeking this information is part of our Title 13 responsibilities. For this reason, these information collections are subject to the confidentiality provisions in Title 13 (13 U.S.C. Sec. 9), and for this reason the Census Bureau must treat the responses as confidential, and may not release them except in aggregate form, including under FOIA.

## 11. Justification for Sensitive Questions

Questions are carefully composed and structured to avoid being sensitive in nature to respondents.

#### 12. Estimate of Hour Burden

A variety of research documents and platforms have been used to collect information from Census Bureau customers. The annual burden hours requested (4,000) is based on the number of interviews we estimate is possible during a one-year period. Based upon prior years' experience, we believe this is a reasonable ceiling.

Customer satisfaction research traditionally has been designed to measure the effectiveness, user-friendliness, and customer preferences (present and in the near future) for a specific program or product/product-line. Limited and focused questions are posed with emphasis on their statistical soundness to generate the most concentrated responses possible. Time per response is tested internally among Census Bureau staff and from a microcosm of the proposed target audience. An average per response is then calculated and the response burden then based upon a theoretical 100 percent response rate.

## 13. Estimate of Cost Burden

We do not expect respondents to incur any costs other than that of their time expended. The information requested is of the type and scope normally carried in company 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 for this information collection.

#### 14. Cost to Federal Government

Recent satisfaction assessments have cost the Census Bureau from \$2,000 to \$5,000 from planning, questionnaire design, data collection and processing, non-response follow-up, data analysis, to final report distribution.

Electronic surveys have been virtually cost-free. The surveys have been either e-mailed or web-based, with automatic data tabulation software.

Sponsoring Census Bureau offices cover the costs of contracted customer research. Monies come from their customer research operating budgets. Specific cost estimates accompany pre-data collection information sent to OMB.

# 15. Reason for Change in Burden

There is no change in burden.

# 16. <u>Project Schedule</u>

The Census Bureau will continue to request clearance from OMB for individual customer-based research initiatives in advance of any data collection as it has in its former clearances.

### 17. Request to Not Display Expiration Date

The Census Bureau will display the assigned expiration data on the information collection instruments.

#### 18. Exceptions to the Certification

There are no exceptions.