

SUPPORTING STATEMENT
U.S. Department of Commerce
U.S. Census Bureau
The American Community Survey
OMB Control No. 0607-0810

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 (ACS). 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In years past, the Census Bureau collected the long-form data only once every ten years, which become out of date over the course of the decade.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 the 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 subpopulations.

The ACS 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 ACS 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 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 housing unit (HU) and GQ facilities every month will provide more timely data and will lessen respondent burden in the 2010 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 ACS in households with a sample of approximately 250,000 addresses per month in the 50 states and the District of Columbia. In addition, we select approximately 3,000 residential addresses per month in Puerto Rico and refer to the survey as the PRCS.

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 GQ residents was also selected for participation in the PRCS.

The goals of the ACS are to:

- Provide federal, state, and local governments an information base for the administration and evaluation of government programs;
- Improve the 2010 Census; and
- 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 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. 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. 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 CATI. Households who are interested may request a survey form in Spanish (Attachment E) by calling our TQA center. For Puerto Rico households, we will mail a Spanish version of the questionnaire. An English version of the PRCS (Attachment F) 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 so that we can obtain information for the additional members of the household. The FEFU instrument (Attachment G) 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 H.

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 I.

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 J). 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 GQ Data Collection

In addition to selecting a sample of residential addresses, we will select a sample of 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 K.) An introductory letter (Attachment L) 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.

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 M.) For Puerto Rico sample GQ residents, we will use PRCS data collection packages (Attachment N) 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 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 O.)

We are developing a CAPI ACS GQ instrument that 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.

c. Changes in ACS Content for 2009

For the 2009 ACS, we will use modified data collection materials based upon results of the 2007 ACS Content Test. The content of the proposed 2009 ACS questionnaire and data collection instruments for both HU and GQ operations reflect 2007 tested changes to content, instructions, and forms design.

A New Field of Degree Question

The 2007 ACS Content Test was a follow-on to the 2006 ACS Content Test and 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 30,000 household addresses was selected to conduct the 2007 ACS Content Test. The test only focused on two versions of a new field of degree question. Analysis of test results and recommendations for new and revised content for the ACS took place from late-2007 through January 2008. The final report providing a full description of the 2007 ACS Content Test and topic-specific research objectives, methodology, and empirical results is forthcoming and will be posted on the Census Bureau Web site.

The 2007 ACS Content Test resulted in a Census Bureau recommendation to OMB to add a new question on field of degree (FOD).

The addition of a FOD of a person's bachelor's degree is proposed for the ACS beginning in 2009. It will be Question 12 on the printed questionnaire. Two versions of such a FOD item were tested in the 2007 ACS Content Test, and the open-ended version performed better than the categorical version. The addition of such an item would yield substantial benefits to a wide variety of users. First, it would greatly increase the efficiency of sampling for the National Survey of College Graduates (NSCG) in several respects. It would eliminate the need for a very large screener sample to identify individuals in the science and engineering (S&E) workforce. The availability of a current national sample frame with the FOD question will substantially improve the ability of the NSCG to track the impact of new immigrants on the S&E workforce and reduce the severe attrition in the NSCG panel experienced when the panel was refreshed only once a decade. Second, it would provide crucial and timely data for program planning, analysis and monitoring for the critical S&E component

of the U.S. workforce.

The FOD item would also meet a variety of analytical needs for NSF and other agencies. For NSF, because the ACS would have information on both FOD and occupation, it will provide annual estimates on the critical S&E component of the workforce. Such data will provide a means to identify and monitor new and emerging trends in the size and composition of the S&E workforce, including new immigrants to the U.S. Such issues are crucial for the American Competitiveness Initiative.

More generally it will be a valuable resource for analyzing the outcomes of college education for individuals majoring in all fields, not just in science and engineering. The geographic detail and the annual and timely availability of FOD data, in conjunction with all the other rich data available from the ACS, will enhance the analytical uses of ACS data for the NSF, other agencies, policymakers, researchers, and the general public. College administrators, educators, and professional societies will use these data to assess how graduates in various fields are faring in the job market as well as informing them about the kinds of training graduates should be receiving to be prepared for the jobs that are likely to be available. It will also provide useful, timely information for prospective students and their parents about employment possibilities for those majoring in a particular field in college. It will tell users about the kinds of occupations those majoring in the social sciences or the humanities go into and how their earnings compare to those who major in other fields.

Congress has mandated the NSF “to provide a central clearinghouse for the collection, interpretation, and analysis of data on scientific and engineering resources and to provide a source of information for policy formulation by other agencies of the Federal Government” (NSF Act of 1950, as amended; 42 U.S.C. 1862 (a) (6)). A critical component of this mission is information on the U.S. science and engineering (S&E) workforce, which NSF collects through several surveys. NSF disseminates information on the number, characteristics, and employment derived from its workforce surveys in a variety of reports and other formats.

The Science and Engineering Equal Opportunities Act (42 U.S.C. 1885a (6) and 1885d) gave NSF a further mandate to collect and report information on women, minority group members and persons with disabilities in the S&E workforce and to report such information to Congress and Executive Department officials biennially (*Women, Minorities, and Persons with Disabilities in Science and Engineering (WMPD)*). The NSF Act of 1950 as amended also requires the National Science Board to report to Congress and the President biennially “a report on indicators of the state of science and engineering in the United States (42 U.S.C. 1863 (j)(1)). *Science and Engineering Indicators (SEI)* fulfills this mandate and a crucial component of

the report is information on the S&E workforce.

Reinstating a Duration of Vacancy Question

ACS determines that a unit is vacant after an unanswered mail survey, an unsuccessful telephone follow-up and a site visit. Vacant units are thus counted in the sample for the month when the site visit is completed, approximately 2 months after the initial mail survey contact attempt. In the interim between the mail survey and the visit, a unit may become occupied. There is no corresponding correction for the situation where units may become vacant in the two months after a timely and complete mail-in survey is returned.

The remedy for addressing part of the gap in ACS vacancy rate measurement is to add back a question on the duration of vacancy to the ACS. This question was asked from 1996 through 2002, but subsequently was dropped since it was not asked in Census 2000 (on the paper non-response follow-up, or NRFU, form). The enumerator who finds a vacant unit would ask the duration of vacancy question of “a knowledgeable source,” such as the property manager of a multifamily development, the contact on the “for rent” sign, or the neighbor of a vacant single-family unit. This will allow the calculation of a derived vacancy rate based on the length of vacancy and renter mobility. The vacancy rate is simply the product of rental turnover rate (per month) and time vacant (in months). Attachment B contains the proposed revised vacancy questionnaire.

The Department of Housing and Urban Development (HUD) has a substantial interest in accurate vacancy statistics at the local level. The HUD uses the ACS to set Fair Market Rents (FMRs) for local areas. The FMRs form the basis of the payment standards set by the local Public Housing Authorities that administer the HCV program for payments to rental unit owners. The HUD will use these data to look at areas for which it estimates FMRs that are characterized by low or falling vacancy rates, or short or declining vacancy durations.

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 ACS is to provide comparable data at the census tract and block group 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 ACS will be useful not only to the federal agencies but also to state, local, and tribal governments in planning, administering, and evaluating programs.

The ACS 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 GQ surveys (whose samples are too small to provide reliable estimates for states or localities) can be combined with data from the ACS to create reliable estimates for small geographic areas.

We will also continue to examine the operational issues, research the data quality, collect cost information and make recommendations in the future for this annual data collection. 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 evaluations.

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 ACS. 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 GQ 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 ACS is the instrument used to collect long-form data that has traditionally been collected only during the decennial census. The content of the ACS reflects topics

that the Congress and the OMB have approved the Census Bureau to collect. A number of questions in the ACS 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 ACS 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 ACS 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 Sepanik, 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

Lynda Carlson, National Science Foundation
Phone: (703) 292-7766

We published a notice in the *Federal Register* on February 27, 2008, 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 Institution. Copies of the letters are included in Attachment Q. We also received one e-mail critical of data collection in general.

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 ACS 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 ACS Respondent and Burden Hour Estimates

Data Collection Operation	Forms or Instrument Used in Data Collection	Annual Estimated Number of Respondents	Estimated Minutes Per Respondent by Data Collection Activity	Annual Estimated Burden Hours	Estimated Burden Hours for Clearance Period 2008 – 2010
I. 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>
II. ACS GQ Facility Questionnaire CAPI - Telephone and Personal Visit	CAPI GQFQ	20,000	15	5,000	15,000
III. ACS GQ Questionnaire – Paper Personal Interview, Telephone or Self-response	ACS-1(GQ), ACS-1(GQ)(PR)	200,000	25	83,333	249,999
IV. ACS Household Reinterview – CATI/CAPI	ACS HU-RI	35,000	10	5,833	17,499
V. ACS GQ GQ-level Reinterview – CATI/CAPI	ACS GQ-RI	2,000	10	334	1,002
TOTALS		3,257,000	N/A	1,994,500	5,983,500

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 FY 09 President's Budget, the estimated cost of the 2008 ACS is approximately \$197 million. The Census Bureau will pay the total cost of the ACS.

15. Reason for Change in Burden

There is no change in the burden hours.

16. Project Schedule

Data collection activities for the 2008 – 2010 began in January 2008. Final ACS data collection for this period is the end of December 2010 for households and mid-January 2011 for GQs.

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

Each month, we 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 begin 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 ACS 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.