



UNITED STATES DEPARTMENT OF COMMERCE
Chief Information Officer

Washington, D.C. 20230

February 22, 2010

Mr. Alex Hunt
Chief, Information Policy Branch
Office of Information and Regulatory Affairs
Office of Management and Budget
Washington, DC 20503

Dear Mr. Hunt:

The Department of Commerce's Census Bureau requests emergency review of an information collection request, "Survey of Health Insurance and Program Participation (SHIPP)." The Census Bureau requests that the Office of Management and Budget conclude its review of the request by March 12, 2010.

The U.S. health care system is decentralized. There is no comprehensive database of the insured or the uninsured. Surveys offer the only way to estimate the uninsured. Measuring the uninsured in surveys, however, has proved to be a persistent challenge to the research community. The Census Bureau has been conducting research on measurement error in its health insurance surveys. This research fed into the development of an experimental set of questions on health insurance (the Redesign), which has the potential to reduce measurement error. The next step in this line of research is SHIPP, a split-ballot experiment planned for the spring of 2010; that survey will include three panels of questions on health insurance: two modeled on previous surveys and the Redesign questions.

On January 21, 2010, the Census Bureau submitted a request to conduct this survey under the Statistical Research Division's (SRD) generic clearance, which covers basic methodological research on questionnaire design and evaluation. The turn-around time for generic clearance is generally ten days, and since 1999 SRD has conducted several similar studies under this generic clearance. In early February, 2010, however, Census was informed by OMB that this particular study did not fall under the generic clearance, but required a separate package because of the increased visibility of health insurance measurement issues.

Given the timing of OMB's determination that a separate clearance package is needed, the choice is either to delay the survey by about six months or to pursue an emergency clearance. One of the negative consequences of delaying the survey is that significant resources have been dedicated to running this survey in the spring of 2010, and shifting the timing would cause those resources to be lost. The most compelling reason the survey cannot be delayed, however, is due to the nature of the research questions. The Redesign is aimed at reducing measurement associated with the calendar year reference period, in tandem with the approximate three-month lag time between the end of the reference period and the interview date. A six-month delay would seriously threaten the applicability of the results.

We appreciate your assistance in this matter.

Sincerely,

Suzanne Hilding