

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In years past, the Census Bureau collected the long-form data only once every ten years, which become out of date over the course of the decade.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 took three to five years to accumulate information to provide accurate estimates. The first three-year estimates were released in 2008; the first five-year estimates in 2010. These 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 provides more timely data and lessened 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.

Starting with the June 2011 mail panel, the Census Bureau increased the annual sample size for the ACS to 3,540,000 households (or 295,000 households per month) in the 50 states and the District of Columbia.

The goals of the ACS are to:

- Provide federal, state, and local governments an information base for the administration and evaluation of government programs; 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.

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. Enclosed with the letter, a brochure provides basic information about the survey in English, Spanish, Russian, Chinese, and Korean, and provides a phone number to call for assistance in each language.

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. A fourth 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 cover letter with this questionnaire package reminds the household of the importance of the ACS, and asks them to respond soon (Attachment D.)

A fifth mailing (Attachment E.) is sent to respondents who have not returned the questionnaire within five weeks and are not eligible for telephone follow-up because we do not have a telephone number for the household. This postcard also reminds these respondents to return their questionnaires and thanks them if they have already done so.

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.

- (1) 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 F.) by calling our TQA center. Households will also be able to request a Language Assistance Guide in Chinese or Korean once these materials are finalized. Language Guides will be implemented no earlier than Spring 2012. Draft versions of these guides are found in Attachments G & H. For Puerto Rico

households, we will mail a Spanish version of the questionnaire. An English version of the PRCS (Attachment I.) 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 J.) 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, such as a landlord, owner, real estate, neighbor, or any local government office, 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 K.

We will conduct a reinterview operation to monitor field representative (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 L.

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 and a thank you postcard Polish, Portuguese, French, Haitian-Creole, and Arabic). Also available are a short explanatory brochure, and a longer brochure in question and answer format (Attachment M). Each of these materials is available in Spanish, Russian, Simplified Chinese, Vietnamese, Korean, Polish, Portuguese, French, Haitian-Creole, and Arabic. The Census Bureau also provides letters for reluctant CATI and CAPI respondents in the following languages, Spanish, Russian, Simplified Chinese, Vietnamese, and Korean.

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 N.) An introductory letter (Attachment O.) 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 if necessary 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. Resident-level personal interviews with sampled GQ residents are conducted using CAPI, but bi-lingual paper questionnaires can also be used for self-response. The GQ CAPI and paper questionnaires contain questions for one person. The GQ resident data collection packages include an introductory letter, a bilingual Confidentiality Notice, a paper questionnaire (for self-response only), a thank you letter, and a copy of the ACS GQ FAQ brochure (Attachment P.) For Puerto Rico sample GQ residents, we will use PRCS data collection packages (Attachment Q.) to collect the GQ data. We will also conduct a separate operation to collect ACS GQ data from sampled GQs in Federal Prisons, and 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 R.).

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 the elimination of 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 in 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. CAPI is also used to conduct personal interviews with GQ residents. We will also use CAPI technologies for both the HU and GQ Reinterview operations. Additionally, we have begun testing an Internet test response option for possible future implementation. By offering an Internet response option in the ACS, the Census Bureau is taking further steps to comply with the e-gov initiative and potentially reduce collection costs. The objectives of the Internet test, which is part of the ACS 2010-2012 Methods Panel, include: potential improvement in self-response rates; potential cost savings if we can change the distribution of responses by mode (i.e. obtain more responses by Internet); and potential improvement in data quality including a potential reduction in item nonresponse.

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; CATI/CAPI data collection takes an estimated 25 minutes. The GQFQ takes an estimated 15 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:

George Sheldon, Department of Veterans Affairs

Kirk Burgee, Federal Communications Commission

Michael DePiro, Department of Agriculture Food and Nutrition Service

We published a notice in the *Federal Register* on March 9, 2011, inviting the public and other federal agencies to comment on our plans to submit this request. We received 26 letters or e-mails in support of or recommending enhancements to the ACS, including letters from three state KIDS COUNT organizations, the Social Security Administration, the Bureau of Economic Analysis, the Asian American Justice Center, the National Women's Law Center, the Chamber of Commerce of the United States, the International Association of Shopping Centers, Inc., Target Corporation, and a joint letter from the Population Association of America and the Association of Population

Centers. Some specific recommendations included: modification of questions concerning "kinship care" (grandparents or other relatives as caregivers), enhanced outreach efforts to Asian Americans and Pacific Islanders with limited English proficiency, recalculation/reissuing of margins of error using "statistically correct approaches," and two suggestions for increased efforts to ensure a more user-friendly version of American FactFinder for retrieval of ACS data. One letter expressed overall support of the ACS, but recommended against Internet data collection that is scheduled to begin, at the earliest, January 2013, citing the potential for increased respondent error. Finally, we also received one e-mail critical of ACS 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 Confidentiality 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 295,000 households each month. 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 3,600 households each month. We estimate that the average time for a reinterview will be 10 minutes.

We plan to conduct personal interviews at 1667 GQs each month. 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 facility interview is 15 minutes. We plan to conduct interviews with approximately 16,667 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. 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 2,337,868 hours. See Table 1 on the following page for the detailed respondent and burden hour estimates.

Table 1. 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
I. ACS Household Questionnaire - Paper Mailout/Mailback	ACS-1, ACS 1(SP), ACS-1PR, ACS-1PR(SP)	3,540,000	38	2,242,000
<i>ACS Household CATI - Telephone Non-response Follow-up</i>	<i>CATI HU</i>	<i>[1,364,000 included in I.]</i>	<i>[38]</i>	<i>[864,000 included in I.]</i>
<i>ACS Household CAPI – Personal Visit Non-response Follow-up</i>	<i>CAPI HU</i>	<i>[698,000 included in I.]</i>	<i>[38]</i>	<i>[442,000 included in I.]</i>
II. ACS GQ Facility Questionnaire CAPI - Telephone and Personal Visit	CAPI GQFQ	20,000	15	5,000
III. ACS GQ CAPI Personal Interview or Telephone, and – Paper Self-response	CAPI, ACS-1(GQ), ACS-1(GQ)(PR)	200,000	25	83,333
IV. ACS Household Reinterview – CATI/CAPI	ACS HU-RI	43,200	10	7,200
V. ACS GQ GQ-level Reinterview – CATI/CAPI	ACS GQ-RI	2,000	10	335
TOTALS		3,805,200	N/A	2,337,868

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 2011 President’s Budget, the estimated cost of the 2011 ACS is approximately \$ 248 million. The Census Bureau will pay the total cost of the ACS.

15. Reason for Change in Burden

There is no change in burden.

16. Project Schedule

Data collection activities for the 2011 – 2013 began in January 2011. Final ACS data collection for this period is the end of December 2013 for households and mid-January 2014 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 September 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. Previously, when the ACS questionnaire displayed an expiration date on the form, the Telephone Questionnaire Assistance staff heard negative comments about participation from respondents, especially when the expiration date was close. 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.