

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) for revisions to 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In years past, the Census Bureau collected the long-form data only once every ten years, which become out of date over the course of the decade.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 takes 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 Decennial Census.

We release a yearly microdata file, similar to the Public Use Microdata Sample file of the Census 2000 long-form records. In addition, we 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 Puerto Rico Community Survey (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 and PRCS 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

Historically the ACS has employed a tri-modal data collection strategy for household data collection—mail, telephone and personal visit. In 2011 the Census Bureau conducted two tests to assess the feasibility of providing an Internet response option to households that receive survey materials by mail.

The first test, conducted in April 2011, had four experimental treatments and a control sample that simply provided a paper questionnaire (no Internet option) as we currently do in the 2012 ACS. Two of the four treatments provided sampled cases with a concurrent choice between using Internet and mail, and the remaining two treatments pushed sampled cases to respond by Internet by removing the paper questionnaire in the second mailing (initial mailing package). Under the concurrent choice approach, one treatment prominently advertised the Internet response option, whereas the other treatment was much more subtle with the online offer. The reason for this distinction was so we could measure any impact of the way in which the Internet option was promoted in mailings, given that past studies have often shown that a concurrent response mode choice depresses overall response.

For the two treatments that pushed cases to respond online, one provided a paper questionnaire to cases that did not respond online one week sooner than the other. That way, we could determine if self-response rates (at the time we normally transition to computer-assisted telephone interviewing, or CATI, nonresponse follow-up) benefited from providing the paper questionnaire sooner.

We examined the impact of each of these treatments on overall self-response rates, Internet response rates, and item nonresponse rates at the end of the first month of data collection (when we transition to CATI). We studied the results separately in two distinct strata, one representing areas with higher Internet penetration and usage, and the other representing all other areas.

The results from the first test supported the inclusion of an Internet mode to collect ACS data. First, introducing a concurrent choice between Internet and a paper questionnaire achieved similar response rates as the control (paper questionnaire only), regardless of how prominently the choice was advertised. However, the more prominent Internet choice resulted in more Internet response.

The most unexpected finding from the April test was with one of the treatments that pushed cases to use Internet by removing the paper questionnaire. When we used this method coupled with an earlier paper questionnaire mailing to nonrespondents, we obtained a higher response rate than the control and concurrent choice treatment in the stratum with higher Internet access, and a similar response rate as the control and concurrent choice treatment in the other stratum. Additionally, more than 50 percent of response came from Internet in both strata, which was significantly more than the concurrent choice treatments. Thus, the potential for cost savings is large with this approach.

However, the drawback of the Push Internet treatment (with an accelerated paper questionnaire mailing) is some loss in response to specific items due to Internet break-offs (cases that started the survey online, but did not finish it). For the basic demographic and housing questions that appear early in the survey, the item nonresponse rates are mostly lower in the Push Internet treatment compared to the

control, but we take a hit in the detailed person questions that appear later in the survey due to break-offs.

Based on the results of the first test, we conducted a follow-up test in November 2011 to see if enhancements to the best performing treatments from the April test could gain more overall response or Internet response. Specifically, we tested an enhancement to the Push Internet treatment (with an accelerated paper questionnaire mailing) since this treatment achieved high overall response and Internet response. We included a new postcard sent to nonrespondents three days after the paper questionnaire mailing. The intention of this postcard was to encourage response among cases that had not responded online. We also included the Push Internet treatment (with the accelerated paper questionnaire, but without the postcard) in the test as a baseline to measure the effect of the postcard.

We also tested enhancements to the concurrent choice treatment that prominently advertised the Internet option in the April test. We tested the inclusion of computer and pencil icons where we present the response mode choice on the questionnaire to draw attention to the choice of modes. Secondly, we tested using the accelerated mailing schedule with the concurrent choice method, which was the same mailing scheduled used for the Push Internet treatment. We also replicated the original concurrent choice with the prominent display of the Internet option as a baseline against which we could measure the impact of the enhancements.

Similar to the April test, the control group was the November 2011 ACS production sample. These cases only received a paper questionnaire and did not have the opportunity to respond online. The second test also included the same stratification of the sample as the April test.

From this test, we saw positive benefits from the Push Internet treatment when we added the new postcard after the paper questionnaire mailing to nonrespondents. We found that this treatment achieved higher response rates at the end of the first month of data collection than the control, as well as the best-performing concurrent choice treatment, in the stratum with higher Internet access. In the other stratum, the response rate for this treatment was not significantly different from the control or best-performing concurrent choice treatment. Moreover, Internet response again was significantly higher for the Push Internet treatment than the concurrent choice treatments.

Analogous to the April test, we observed increases in item nonresponse rates in the Push Internet treatment (with the new postcard) compared to the control among the detailed person questions in the later half of the survey due to Internet break-offs. Again, this treatment had lower or comparable item nonresponse rates for questions in the earlier part of the survey (basic demographic and housing questions) before most break-offs occurred.

Based on the test findings, we would like to begin using the Push Internet (with the accelerated mailing of the paper questionnaire and new postcard) in the January 2013 ACS panel. We expect that using this method will result in similar or better overall self-response rates, with more than half of mail cases shifting to Internet. Pursuant to the receipt of adequate funding, we hope to use CATI Failed Edit Follow-up (FEFU) (if we have a telephone number) to follow-up with Internet break-offs to help lower item nonresponse rates to the previous levels.

Detailed reports documenting test methods and results can be found at http://www.census.gov/acs/www/library/by_series/internet_data_collection/ (Attachment Rpt1).

For households eligible to receive survey materials by mail, the first contact will be a pre-notice letter (Attachment A) alerting residents that they will receive instructions in the mail in a few days on how to complete the ACS survey, and encouraging them to do so 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, Vietnamese and Korean, and provides a phone number to call for assistance in each language.

The second mailing (Attachment B) includes a letter and instruction card explaining how to complete the survey online, as well as a Frequently Asked Questions (FAQ) brochure. The instruction card provides the information on how to respond in English and Spanish. The letter explains that if the respondent is unable to complete the survey online, a paper questionnaire will be sent later. The Internet version of the questionnaire is available in English and Spanish and includes questions about the HU and the people living in the HU. The Internet questionnaire (Attachment C) has space to collect detailed information for twenty people in the household. The third mailing is a postcard (Attachment D) that reminds respondents to complete the survey online, thanks them if they have already done so, and informs them that a paper form will be sent later if we do not receive their response.

A fourth mailing, the American Community Survey Household (HU) Questionnaire Package (Attachment E), is sent only to those sample addresses that have not completed the online questionnaire within two weeks. The content includes a cover letter, a paper copy of the questionnaire, an instruction guide for completing the paper form, an instruction card for completing the survey online, an FAQ brochure, and a return envelope. The cover letter with this questionnaire package reminds the household of the importance of the ACS, and asks them to respond soon either by completing the survey online or by returning a completed paper questionnaire. The fifth mailing is a postcard (Attachment F) that reminds respondents that “now is the time to complete the survey,” informs them that an interviewer may contact them if they do not complete the survey, and reminds them of the importance of the ACS.

A sixth mailing (Attachment G) is sent to respondents who have not completed the

survey 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.

For sample housing units in Puerto Rico, a different mail strategy is employed. Based on the results of testing in 2011 and concerns with the resulting Internet response rates from that testing, we will be delaying the introduction of an Internet response option until a later date while we assess the best implementation approach. Therefore, in 2013 for Puerto Rico we will continue to use the previously used mail strategy with no references to an Internet response option (Attachment H). Specifically, the second mailing will include a cover letter, an FAQ brochure, a copy of the paper questionnaire, an instruction booklet, and a return envelope, but no instruction card for completing the survey online. Also, no second reminder postcard (the fifth mailing described above for stateside HUs) will be sent to Puerto Rico HUs.

The addition of the internet collection mode represents a large change with far reaching impact to the ACS collection and processing systems. In consideration of the magnitude of the change, the ACS program has determined this change introduces a risk with sufficient severity to require a contingency plan. If the Census Bureau encounters delays to the Internet mode implementation, then Census Bureau's contingency plan is to continue the current 2012 ACS mail strategy into early 2013. In order to prepare for this contingency the Census Bureau requests approval to print an additional set of ACS materials that have the 2013 content changes but use the format of the 2012 mailout strategy, as described below.

The first mailing would be a pre-notice letter (Attachment CP1) 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 FAQ brochure provides basic information about the survey in English, Spanish, Russian, Chinese, Vietnamese, and Korean, and provides a phone number to call for assistance in each language.

The next mailing would be the initial questionnaire package that includes a cover letter, the questionnaire, an instruction guide, a brochure, and a return envelope (Attachment CP2) 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. A questionnaire package in Spanish (Attachment CP3) is available to households by request.

The third mailing would be a postcard (Attachment CP4) that reminds respondents to return their questionnaires and thanks them if they have already done so. A fourth mailing would be 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 CP5.)

A fifth mailing (Attachment CP6) would be 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.

If the Census Bureau decides to pursue the contingency of mailing out these forms without an Internet response option for the start of 2013, we will submit a non-substantive change request for OMB approval.

After the self-response modes of mail and Internet, the next mode of data collection is computer-assisted telephone interviewing (CATI) to conduct telephone interviews for all households that do not respond by Internet or mail and for which we are able to obtain telephone numbers. The final 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 self-response (paper or Internet) 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 or Internet questionnaires, 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 I) by calling our TQA center. Starting in May 2012, households are also able to request a Language Assistance Guide in Chinese or Korean. Copies of these guides are found in Attachments J & K. For Puerto Rico households, we will mail a Spanish version of the questionnaire. An English version of the PRCS (Attachment L) can also be requested through TQA.

Previously, we have conducted a CATI Failed Edit Follow-up (FEFU) if we have a telephone number and either: 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. Starting in October 2012, we will be scaling back the FEFU operation to focus on households with coverage problems (such as mail respondents with more than 5 people, mail respondents with more people listed on the cover than in the basic demographic section, or questionnaires returned for vacant units). We will also use the FEFU operation in 2013 to collect missing data from some survey respondents that did not finish their response to the Internet survey,

but rather broke off before completion; to confirm the status of Internet responses classified as businesses or vacant units; and to possibly collect the minimum amount of information needed to further process the questionnaire. If funding can be obtained in the future, we would resume FEFU for mail returns missing responses to a critical amount of questions. The FEFU instrument (Attachment M) is available to interviewers in both English and Spanish.

We will also collect information from HUs 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 N.

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 O.

CAPI interviewers have several tools available for use to explain the ACS to households, including an introductory letter, a thank you letter, a short explanatory brochure, and a longer brochure in question and answer format (Attachment P). Each of these materials is available in English, 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 English, 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. An introductory letter and FAQ brochure for the facility administrator (Attachment Q) are mailed to the sample GQ approximately two weeks prior to the period when an FR may begin making contact with the GQ. 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 R). If necessary, FRs will use a GQ listing sheet to select a small sample of people to interview within the GQs, and provide a thank you letter to their facility contact person.

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 (Attachment S) include an introductory letter, a bilingual Confidentiality Notice, a paper questionnaire (for self-response only), an instruction guide for completing the paper form, a thank you letter, and a copy of the ACS GQ FAQ brochure. For Puerto Rico sample GQ residents, we will use PRCS data collection packages (Attachment T) 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 U).

The Census Bureau is collecting these data under authority of Title 13, United States Code, Sections 141, 193, and 221.

In March 2012, the Committee on National Statistics of the National Research Council of the National Academies released a report titled “Small Populations, Large Effects: Improving Measurement of the Group Quarters Population in the American Community Survey¹” written by the Panel on Statistical Methods for Measuring the Group Quarters Population in the American Community Survey. The Census Bureau is carefully reviewing this report for potential future enhancements to the ACS GQ operations.

Changes in ACS Content for 2013

For the 2013 ACS, we will use modified data collection materials based upon results of the 2010 ACS Content Test. The content of the proposed 2013 ACS questionnaire and data collection instruments for both HU and GQ operations reflect changes to content, instructions, and forms design that were tested in 2010.

The 2010 ACS Content Test included federal agency stakeholder input to determine test content, cognitive laboratory pre-testing, and expert reviews to develop alternative versions of test questions. A national field test sample of approximately 70,000 household addresses in the contiguous United States (not including Puerto Rico, Alaska, or Hawaii) was selected to conduct the test. Analysis of test results and recommendations for new and revised content for the ACS took place from late 2010 through late 2011. For reports that provide a full description of the overall 2010 ACS Content Test and topic-specific research objectives, methodology, and empirical results, see the Census Bureau website at: http://www.census.gov/acs/www/library/by_series/content_test_evaluation_reports/ (Attachment Rpt2).

¹ This report is available at: http://www.nap.edu/catalog.php?record_id=13387

The 2010 ACS Content Test resulted in recommendations to OMB to modify five (one housing and four population) question series on the ACS. The modified housing question is the food stamp question, which at the request of the Food and Nutrition Service is being revised to incorporate the program name change to the Supplemental Nutrition Assistance Program (SNAP). The new version will be used in all collection modes. The modified population questions are: veteran status and period of service, and property income and wages. The Census Bureau revised the property income and wage questions to improve response by breaking up these questions into shorter pieces to improve comprehension when the questions are asked by an interviewer. This change will be incorporated into the interviewer-administered modes only. At the request of the Department of Veteran Affairs, the Census Bureau revised the veteran status and period of service questions to simplify the reporting categories. The new version will be used by all collection modes.

The Census Bureau proposes including two new subjects on the ACS: computer and Internet usage and parental place of birth.

Computer and Internet Usage

As authorized by the Broadband Data Improvement Act of 2008, the Federal Communications Commission sponsored the computer and Internet usage topic. The Broadband Data Improvement Act² requires that the Secretary of Commerce, in consultation with the Federal Communications Commission, expand the American Community Survey to elicit information from residential households, including those located on native lands, to determine whether persons at such households own or use computers at their address, whether persons subscribe to Internet service and, if so, whether they subscribe to dial-up or broadband Internet service at that address. The additions to the questionnaire consist of three questions with a mix of fixed choice and open-ended responses.

Parental Place of Birth

Based on the results of the 2010 ACS Content Test, the Census Bureau recommended to OMB that two questions on parental place of birth (In what country was your father born? In what country was your mother born?) be included on the 2013 production ACS questionnaire.

Questions on parental place of birth are important because they divide the population into “first generation” (the foreign born), “second generation” (the children of immigrants), and “third or higher generation” (native born with no foreign-born parents) categories, allowing policymakers and researchers to examine questions about adaptation and integration of immigrants and their descendants over generations. Also, questions on parental place of birth are useful to examine the social and economic

² Section 103(d) of the Broadband Data Improvement Act, Pub. L. No. 110-385, § 103(d), 122 Stat. 4096, 4098 (2008)

characteristics of the children of immigrants because they clearly define the second generation.

Detailed information about needs for data on parental place of birth by specific federal agency is outlined in section 2 of this document. The data from the ancestry question on the ACS questionnaire is currently used to meet the need for information on national origin. However, the intent of the ancestry question was not to measure the degree of attachment the respondent has to a particular ethnicity. The ancestry data represent self-classification by people according to the group or groups with which they most closely identify. Ancestry refers to a person's ethnic origin or descent, "roots," heritage, or the place of birth of the person, of the person's parents, or of their ancestors before their arrival in the United States. For example, a response of "Italian" might reflect total involvement in an Italian community or only a memory of ancestors several generations removed from the individual. However, the concept of national origin, especially in the context of discrimination, refers most directly to those either from a particular place of origin (i.e., the first generation) or who exhibit the physical, cultural, or linguistic characteristics associated with that national origin group (i.e., the first and second generation). In other words, national origin discrimination refers more specifically to the denial of equal opportunity because of an individual's recent migration history, not that several generations in the past.³ Questions on parental place of birth, by dividing the population into generation groups, provide data that reflect a person's recent migration history and, by extension, national origin.

Parental place of birth data would also provide useful information about migratory and seasonal agricultural workers and their families, called for by U.S. Code focusing on public health and education (Title 42 – The Public Health and Welfare and Title 20 – Education). According to the 2007 American Community Survey, about half of all workers in agricultural occupations were foreign born. Estimates of this population by generation groups would enable health care providers to tailor their programs, providing services in the language and cultural context most appropriate to their patients, which would include first-generation adults and many second-generation children. At the national level, according to the 2008 Current Population Survey, of all children under age 18, about 5 percent are first generation while 20 percent are second generation. ACS data will enable local estimates of the population by generation group which can help school districts to plan and implement programs directed at the special needs of both immigrant and second-generation children. U.S. Code focusing on education also emphasizes the need to develop special programs for limited-English proficiency (LEP) students (including, for example, the Language Enhancement and Academic Achievement Act). Although it is assumed that the majority of LEP students are immigrant children, many are likely to be second generation. Without data on parental place of birth at the state and local level, school districts would not be able to estimate the total number of potential LEP students – both first and second generation – that may require special training. ACS data on parental place of birth would also

³ Beyond the second generation, it is likely that claims of discrimination would be made based on race, Hispanic origin, or gender, rather than national origin.

provide education policymakers with data on children under age 5, which could help with planning.⁴

Finally, parental place of birth data, when combined with other demographic, economic, and migration-related statistics, such as age, sex, occupation, year of arrival, and citizenship status, can be used to assess the impact of immigration on, for example, the economy, labor markets, education system, social services, etc. This is particularly important at the local level where rapidly changing immigrant populations can require additional resources. U.S. Code focusing on the impact of immigration (Title 8 – Aliens and Nationality) call for data that can help address the impact of immigration, including the rate, size, and distribution of population growth in the United States. While the size of the immigrant population can increase only through additional in-migration, immigrants contribute to the overall population by having children (who are native if born in the United States). Questions on parental place of birth will give policymakers and planners a way to assess the immediate impact of immigration and the longer-term impact of immigrant fertility.

Future Research on Parental Place of Birth

The Census Bureau believes there is added value in collecting information about parental place of birth, though some may feel that this topic is somewhat duplicative when collected in connection with existing survey questions on race, Hispanic origin, and ancestry. Adding the parental place of birth questions to the questionnaire in 2013 would be done as part of a multi-year process to further examine the relationship of the data for these topics. The ACS data would also be evaluated in connection with results from the 2010 Census Alternative Questionnaire Experiment, and this combined research would be used in determining recommendations for which questions would remain on the ACS at the conclusion of this process. The Census Bureau plans to provide various opportunities for public comment as well as dialogue with groups that are especially interested in these data as we refine the plans and share results on this cross-topical research.

Changes to the 2013 Puerto Rico Community Survey

There is one proposed change that would be unique to the Puerto Rico Community Survey (PRCS) that was not tested during the 2010 ACS Content Test. Concerns with data for Puerto Rico related to the changes implemented to the plumbing questions in 2008 led to further investigation of how these questions were being interpreted in Puerto Rico. Cognitive testing conducted with Puerto Rico residents confirmed that confusion was common related to how to respond to the question “Does this house, apartment or mobile home have hot and cold running water?” because it is common for housing units in Puerto Rico to not have a water heater. After discussions with the Puerto Rico Planning Board, the Census Bureau proposes modifying the PRCS version

⁴ Data on language spoken at home and the ability to speak English is collected for individuals age 5 and over. By estimating the number of children under age 5 who are either immigrants or second generation, parental place of birth data could provide to education planners early statistics on those likely to need special language training.

of this question by replacing it with two separate questions: “Does this house, apartment or mobile home have running water?” and “Does this house, apartment or mobile home have a water heater?”

2. Needs and Uses

The primary need for continued full implementation of the ACS is to provide comparable data at small geographies, including metropolitan and micropolitan areas, as well as 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. For instance, the Department of Housing and Urban Development (HUD) uses state, county, and metropolitan area level ACS median income estimates to allocate Section 8 Housing funds and to set Fair Market Rents for metropolitan areas.⁵ Both these calculations use a yearly update factor based on ACS data and baselined data (currently from the Census 2000 Long Form, though HUD is in the process of phasing this out).⁶

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. For example, within the Department of Health and Human Services (HHS), the Low Income Home Energy Assistance Program (LIHEAP) uses ACS data at the state level of geography in both its funding formula and its program administration.⁷ Additionally, the USDA’s Food and Nutrition Service (FNS) provides states and school districts data based on ACS poverty estimates in order to evaluate their Supplemental Nutrition Assistance Program programs.⁸

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. The Department of Education’s Title 1 program, under the Elementary and Secondary Education Act reauthorization in 2001⁹, uses the Census Bureau’s Small Area Income and Poverty Estimates

5 See 42 USC 1437b and 1437f

6 HUD’s funding formulas are available at: http://www.huduser.org/portal/datasets/fmr/fmrover_071707R2.doc and http://www.huduser.org/portal/datasets/il/il10/IncomeLimitsBriefingMaterial_FY10.pdf. The results of these formulas are announced yearly in the Federal Register.

7 See 42 USC 8621 through 8630

8 See 7 USC 2025 (9)(d). The FNS calculates a Program Access Index that allows them to provide additional award funds to states that have the highest levels of SNAP access, or show the greatest annual improvement in SNAP access. For the PAI formula, see: <http://www.fns.usda.gov/ora/menu/Published/snap/FILES/Other/pai2008.pdf> and [7 CFR 275.24](http://www.fns.usda.gov/ora/menu/Published/snap/FILES/Other/pai2008.pdf).

9 See 20 USC 6313 (a)(5) and P.L.107-110

(SAIPE) to allocate funds to school districts in order to close the achievement gap between upper and lower-income students. The SAIPE program uses ACS income estimates as a key input in its model. As an additional example, the Department of Transportation's Federal Highway Administration (FHWA) uses American Community Survey Journey to Work estimates (including means of transportation, time a worker leaves the house to go to work, travel time, and work location) to create traffic flow models.¹⁰ These flow patterns are used by both the FHWA and state transportation agencies to plan and fund new road and other travel infrastructure projects.

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.

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.

Additional question by question justification can be found in Attachment Rpt3.

New Questions

Computer and Internet Access

The Federal Communications Commission (FCC) and the National Telecommunications and Information Administration (NTIA) in the Department of Commerce were required under the Broadband Data Improvement Act (Broadband Act) to expand the ACS to collect information regarding the public's access to computer technology and Internet service.¹¹ The FCC and NTIA are required under the Broadband Act to not only measure and report on the computer and Internet access of the US public, but also to compare the country's overall access to countries abroad and to construct and implement plans to improve under-served areas.

Prior to the addition of this series of questions to the ACS, the FCC and NTIA have used periodic "Internet Use" Supplements to the Current Population Survey¹² to report on the country's computer usage and Internet access to Congress and public. However, the Broadband Act requires these analyses and action plans at a geographic area that only the ACS provides, including AIAN Tribal Lands. Under 47 USC 1302, the FCC is to use these new ACS estimates alongside other sources of demographic, economic, and commercial data to determine the "geographic areas" that lack advanced telecommunications capability. It is then supposed to identify the

¹⁰ See 23 USC 134 and 23 USC 135. See also 23 USC 303 and 23 CFR 450.316-322. See also P.L. 109-59.

¹¹ See P.L. 110-385, Section 103(d)

¹² See OMB Control # 0660-0021, last active ICR: # 201105-0660-001

demographic and economic characteristics of these areas (including population density and average income) and use this information to shape its plans for expanding access going forward. The purpose of expanding access to computers and the Internet is to continue and broaden the “...enhanced economic development and public safety for communities across the nation,” that Congress found as a result of broadband deployment.¹³ Congress further found that “Improving Federal data on the deployment and adaptation of broadband service will assist in the development of broadband technology across all regions of the Nation.”¹⁴ The new computer and Internet access questions on the ACS are designed to fulfill this requirement.

Parental Place of Birth

Several federal agencies have expressed specific needs for data on parental place of birth. For instance, The Department of Justice, Civil Rights Division (CRT) would use parental place of birth data from the ACS to advance their mission in significant ways, particularly with respect to their enforcement of statutes that prohibit discrimination on the basis of national origin. The Supreme Court has defined “national origin” to embrace not only a person’s country of birth but, “more broadly, the country from which his or her ancestors came.”¹⁵ Parental place of birth data would improve CRT’s enforcement of civil rights laws in two principal ways: by improving outreach to particular national-origin groups in specific geographic areas, and by allowing CRT to more accurately measure the potentially discriminatory disparate impacts of practices subject to federal civil rights laws. In the first case, CRT investigates allegations of national-origin discrimination by federal funding recipients in violation of Title VI of the Civil Rights Act of 1964 and other federal civil rights laws, and by employers in violation of Title VII of the Civil Rights Act and the Immigration and Nationality Act (INA), which prohibits national-origin discrimination in hiring, firing, and paid-recruitment processes.¹⁶ In cases alleging discrimination against a particular national-origin group, because the ACS provides annual data estimates by detailed geographic areas, ACS parental place of birth data would help CRT locate the communities and neighborhoods with high concentrations of the national-origin group at issue. Secondly, parental place of birth data would allow CRT to measure the potentially disparate and unlawful impacts of practices subject to federal civil rights law.¹⁷ To determine the proportion of class members impacted, one must “take into account the correct population base and its racial makeup.”¹⁸ ACS parental place of birth data would help CRT to identify the appropriate population base and its national origin makeup. The data would allow CRT to more accurately measure the discriminatory disparate impact on the national-origin group at issue, and allow CRT to pursue appropriate relief for the unlawful discriminatory practices.

13 P.L. 110-385, Section 102 (1)

14 P.L. 110-385, Section 102 (3)

15 *Espinoza v. Farah Mfg. Co., Inc.*, 414 U.S. 83 (1973)

16 P.L. 88-352, Section 601 through 605; P.L. 88-352, Section 701 through 716; P.L. 89-236.

17 See *Tsombanidis v. West Haven Fire Dep’t*, 352 F.3d 565, 577 (2d Cir. 2003)

18 See *Darensburg v. Metro. Transp. Comm’n*, 636 F.3d 511, 520 (9th Cir. 2011)

Information regarding parental place of birth is of key importance to several U.S. Department of Health and Human Services (HHS), Administration for Children and Families (ACF) programs. For example, Migrant and Seasonal Head Start (MSHS) serves rural agricultural workers, offering child care/early education support to young children and their families. For effective supports that are responsive to the Head Start Performance standards, MSHS interventions, curricula and assessments must be culturally and linguistically appropriate under the Improving Head Start for School Readiness Act of 2007.¹⁹ In addition, standards are in place requiring staffing adjustments to match to the linguistic variations within a classroom.²⁰ A simple way to identify the potential variations within a community population is through identification of the families' countries of origin. Another need for parental place of birth data by HHS is for the administration of the Temporary Assistance for Needy Families (TANF) program. The data will provide valuable information to local and state administrators, helping them gain insight into the characteristics of current and potential clients and enabling them to plan appropriate service approaches for their client populations.

The U.S. Citizenship and Immigration Services, Department of Homeland Security (USCIS) Office of Citizenship frequently uses and cites ACS data in reports and analysis for intra-agency and intra-departmental officials, as well as for external stakeholders. The existing Census data on the foreign-born population in the United States are valuable to ascertain a more complete population and immigration picture than the direct data available to DHS/USCIS through formal immigration channels and direct engagement with legal immigrants. The Office of Citizenship, which is responsible for developing educational resources, initiatives, and outreach programs, is especially interested in the ability to compare first- and second-generation data. The USCIS Office of Policy and Strategy Research and Evaluation Division is also interested in data on parental place of birth. As an Agency, the Department of Homeland Security maintains statistics on people that come to the United States. However, most of the detailed data collected are about principle immigrants, not their dependents. The administrative data collected by and available to USCIS analysts does not have complete data on the children of immigrants, whether they were born in the United States or abroad.

Further legislative justification for the inclusion of questions on parental place of birth on the ACS questionnaire is provided in Attachment Rpt4

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

19 P.L. 110-134
20 45 CFR 1304.52

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 conducted testing of an Internet response option which we will implement in 2013. By offering an Internet response option in the ACS, the Census Bureau is taking further steps to comply with the e-gov initiative. Based on the results of the 2011 testing, implementing an Internet response option will also potentially improve self-response rates and create cost savings by reducing printing and data capture costs and workloads for more costly follow-up operations.

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 40 minutes to complete; CATI/CAPI data collection takes an estimated 27 minutes, and response via Internet takes an estimated 39 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 December 28, 2011, inviting the public and other federal agencies to comment on our plans to submit this request. We received 17 comments in response to the notice (Attachment V). Of the responses, Thirteen supported the changes, one did not, and three, the Census Bureau felt, were not relevant to the proposed changes. Respondents included researchers, sociologists at prominent universities, economists, national interest groups, the U.S Chamber of Commerce, the Instituto de Estadísticas de Puerto Rico and a Census Bureau field representative.

One letter included an article commenting on the "usability" of the persons per household information. The Census Bureau, while interested and open to the perspective of outside data experts, finds the recommendations made in the article not relevant to the proposed content and data collection changes. In addition, other comments, such as to make the ACS survey age comparable to the CPS survey age and to increase the ACS sample size, are also not relevant to the changes covered in this package.

One comment suggested a data product that would tabulate internet usage by race, ethnicity, and poverty status. The Census Bureau welcomes recommendations on how to present the new content with the understanding that all data products must meet quality and reliability standards before publication.

Another comment, made by a Census Bureau field representative, recommended against additional questions, citing the difficulty for staff to justify the collection of the new data items. The Census Bureau understands the challenges of collecting data from

the public and will make it a priority to educate the ACS field representatives on the importance and uses of the new questions.

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 mail package and contains this assurance. Households responding using the Internet questionnaire also are presented with additional assurances of their confidentiality and security of their online responses. 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. The Census Bureau has materials that demonstrate how we use the data for sensitive questions, and how we keep that data confidential. Respondents who use the Internet to complete the survey will have access to links on the survey screens that provide information to help address their questions or concerns with sensitive topics.

12. Estimate of Hour Burden

The sample size is 295,000 households per month, and we plan to mail survey materials to approximately 286,000 households each month that have mailable addresses. The Census Bureau estimates that, for the average household, the new 2013 version of either the paper ACS-1 questionnaire or the Internet questionnaire will take 40 minutes to complete, including the time for reviewing the instructions and answers. This reflects a two minute increase from the estimated time to complete the 2012 household version of the paper questionnaire. We do not estimate any increase in time to complete the Group Quarters interviews. 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. The total number of respondent burden hours for a full year starting with 2013 is 2,455,868 hours. See Table 1 on the following page for the detailed respondent and burden hour estimates. The estimated total number of respondent burden hours for June 2012 through December 2012 is 1,363,900 hours (see Table 2 for the detailed estimates). Therefore, adding the lower June through December 2012 estimated hours for the household questionnaire to 2.42 times the annual estimated hours for 2013 and beyond, dividing the total by 3, and rounding to the nearest 100, the average annual estimated hours for June 2012 through May 2015 is 2,435,568 hours (see Table 3 for the detailed estimates).

Table 1. ACS Respondent and Burden Hour Estimates for a Full Year Starting in 2013

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	40	2,360,000
<i>ACS Household CATI - Telephone Non-response Follow-up</i>	<i>CATI HU</i>	<i>[1,364,000 included in I.]</i>	<i>[40]</i>	<i>[910,000 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>[40]</i>	<i>[466,000 included in I.]</i>
<i>ACS Household Internet</i>	<i>Internet HU</i>	<i>[712,000 included in I.]</i>	<i>[40]</i>	<i>[475,000 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	2,455,868

Table 2. ACS Respondent and Burden Hour Estimates for June through December 2012

Data Collection Operation	Forms or Instrument Used in Data Collection	Estimated Number of Respondents	Estimated Minutes Per Respondent by Data Collection Activity	Estimated Burden Hours
I. ACS Household Questionnaire - Paper Mailout/Mailback	ACS-1, ACS-1(SP), ACS-1PR, ACS-1PR(SP)	2,065,000	38	1,308,000
<i>ACS Household CATI - Telephone Non-response Follow-up</i>	<i>CATI HU</i>	<i>[795,700 included in I.]</i>	<i>[38]</i>	<i>[503,900 included in I.]</i>
<i>ACS Household CAPI – Personal Visit Non-response Follow-up</i>	<i>CAPI HU</i>	<i>[407,200 included in I.]</i>	<i>[38]</i>	<i>[257,900 included in I.]</i>
II. ACS GQ Facility Questionnaire CAPI - Telephone and Personal Visit	CAPI GQFQ	11,700	15	2,900
III. ACS GQ CAPI Personal Interview or Telephone, and – Paper Self-response	CAPI, ACS-1(GQ), ACS-1(GQ) (PR)	116,700	25	48,600
IV. ACS Household Reinterview – CATI/CAPI	ACS HU-RI	25,200	10	4,200
V. ACS GQ GQ-level Reinterview – CATI/CAPI	ACS GQ-RI	1,200	10	200
TOTALS		2,219,800	N/A	1,363,900

Table 3. Estimated Average Annual ACS Respondent and Burden Hours for June 2012 through May 2015

Data Collection Operation	Forms or Instrument Used in Data Collection	Annual Estimated Number of Respondents	Estimated Minutes Per Respondent by Data Collection Activity	Annual Average Estimated Burden Hours
I. ACS Household Questionnaire - Paper Mailout/Mailback	ACS-1, ACS-1(SP), ACS-1PR, ACS-1PR(SP)	3,540,000	38 through December 2012, 40 thereafter	2,339,700
<i>ACS Household CATI - Telephone Non-response Follow-up</i>	<i>CATI HU</i>	<i>[1,364,000 included in I.]</i>	<i>[38 through December 2012, 40 thereafter]</i>	<i>[902,000 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 through December 2012, 40 thereafter]</i>	<i>[461,900 included in I.]</i>
<i>ACS Household Internet</i>	<i>Internet HU</i>	<i>[712,000 starting in January 2013, included in I.]</i>	<i>[40 starting in January 2013]</i>	<i>[383,200 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	2,435,568

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 2012 President's Budget, the estimated cost of the 2011 ACS is approximately \$253 million. The Census Bureau will pay the total cost of the ACS.

15. Reason for Change in Burden

Due to the changes in the planned questionnaire content for 2013, we estimate that survey will take two additional minutes per household. Therefore we have increased the former estimate for completing the household paper ACS-1 questionnaire from 38 minutes to 40 minutes.

16. Project Schedule

The new Internet data collection mode and data collection activities for the 2013 Content will begin in late December 2012.

Approximately one month after the initial mailing for a sample month, we begin the CATI operation for households, which have not responded by mail or Internet. 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.

We will release data for the new 2013 content beginning September 2014. 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.