

**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 demographic, social, economic, and housing data every year 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In years past, the Census Bureau collected the long-form data only once every ten years and it became out of date over the course of the decade.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 provides 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 are updated annually.

Using the Master Address File (MAF) from the decennial census, which is updated each year, we select a sample of addresses and mail survey materials each month to a

new group of potential households. Most households are asked first to complete the survey via the Internet, with a paper questionnaire provided to those households that do not respond via Internet. We then attempt to conduct interviews over the telephone with households that have not responded either by mail or Internet. Upon completion of the telephone follow-up, we select a sub-sample of the remaining households that have not responded either by mail, Internet, or telephone and designate the household for a personal interview. Typically, for personal interviews, we sample at a rate of one in three. We also conduct interviews with a sample of residents at selected group quarters (GQ) facilities. Collecting these data from a new sample of housing units (HUs) and GQ facilities every month provides more timely data and lessens respondent burden in the Decennial Census.

We release a yearly micro data file, similar to the Public Use Micro data 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 micro data 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 had 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. Based on the results of these tests, the Census Bureau implemented an Internet response option for the ACS for the start of the 2013 data collection.

Detailed reports documenting the methods and results from tests that led to the implementation of this methodology can be found at:  
[http://www.census.gov/acs/www/library/by\\_series/internet\\_data\\_collection/](http://www.census.gov/acs/www/library/by_series/internet_data_collection/)

For households eligible to receive survey materials by mail, the first contact is a pre-notice letter 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 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 first mailing materials can be found in Attachment A.

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.

In a fourth mailing (Attachment E), the American Community Survey Household (HU) Questionnaire Package 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 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 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.

A seventh mailing (Attachment H) is sent to those respondents who request a replacement package in Spanish. Similar to the fourth mailing, 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.

If necessary, an additional reminder postcard is sent if we do not receive the completed questionnaire by the cut-off date and we do not have a telephone number on file for the housing unit.

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 are delaying the introduction of an Internet response option for Puerto Rico until a later date while we assess the best implementation approach. Therefore, in 2014 for Puerto Rico we plan to continue to use the previously used mail strategy with no references to an Internet response option (Attachment I). Similar to the stateside mailing strategy, our first PR mailing includes a pre-notice letter in Spanish and English.

The second mailing includes a cover letter, an FAQ brochure, a copy of the paper questionnaire, an instruction booklet, and a return envelope.

The third mailing is a reminder postcard.

The fourth mailing is a replacement package similar to the second mailing and is mailed only to non respondents.

The fifth mailing is a reminder postcard that is mailed only to non respondents not selected for telephone follow up because we do not have a good telephone number on file for the housing unit.

After the self-response modes of mail and Internet, the next mode of data collection is computer-assisted telephone interviewing (CATI). This is used to conduct telephone interviews for all households that do not respond by Internet or mail and for which we were able to obtain telephone numbers.

The final mode of data collection is computer-assisted personal interviewing (CAPI) and is used 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 conduct a CAPI-only operation to collect ACS data from sampled HUs in remote areas of Alaska.

We 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 modes. Respondents may call the ACS toll free TQA numbers listed on various ACS mail materials. The TQA staff answers respondent questions and/or completes the entire ACS interview using CATI. Households who are interested may request a survey form in Spanish (Attachment H) by calling our TQA center. Since May 2012, households are also able to request a Language Assistance Guide in Simplified Chinese or Korean. Copies of these guides are found in Attachments J and K. For Puerto Rico households, we mail a Spanish version of the questionnaire. Upon request through TQA, respondents are mailed an English version of the PRCS questionnaire and appropriate informational materials (Attachment L).

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. Since starting in October 2012, we scaled back the FEFU operation to focus on only 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 also use the FEFU operation to confirm the status of Internet responses classified as businesses or vacant units and to 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 and Internet returns missing responses to critical questions. The FEFU instrument (Attachment M) is available to interviewers in both English and Spanish.

We also collect information from HUs identified as vacant. We 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 instruments that are worded differently and those asked in addition to the questions on the household ACS questionnaire for vacant units are included in Attachment N.

We 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 use a separate set of questions for units that were identified as occupied, vacant, or noninterview at the time

of the original CAPI interview. 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. Each of these materials is available in English, Spanish, Arabic, Simplified Chinese, French, Haitian-Creole, Korean, Polish, Portuguese, Russian, and Vietnamese. The Census Bureau also provides letters for reluctant CATI and CAPI respondents in English, Spanish, Korean, Simplified Chinese, Russian, and Vietnamese. These letters and brochures can be found in Attachment P.

### **ACS Group Quarters Collection**

In addition to selecting a sample of residential addresses, we select a sample of GQs. An introductory letter and FAQ brochure for the facility administrator are mailed to the sample GQ approximately two weeks prior to the period when a field representative (FR) may begin making contact with the GQ and the FR gives the facility contact person a thank you letter when they arrive for the interview (Attachment Q). The 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 use a GQ listing sheet to generate the sub-sample of persons for ACS interviews (Attachment R).

We 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 brochure. We conduct a separate operation to collect ACS GQ data from sampled GQs in Federal Prisons, and in remote Alaska.

For Puerto Rico sample GQ residents, we use PRCS data collection packages (Attachment T) to collect the GQ data.

We conduct a GQ reinterview (RI) operation to monitor the performance of FRs in conducting the GQFQ interviews. For the GQ RI operation, we 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.

## Changes in ACS Content for 2014

The content of the proposed 2014 ACS questionnaire and data collection instruments for both HU and GQ operations reflect changes to content and instructions that were proposed in 2012.

### *Additional Question on Health Insurance Premiums and Subsidies*

42 U.S.C. Sec. 1396r-4(a)(7)(B) and 42 USC Sec. 1397ii (b) requires that the Census Bureau include health insurance survey information in the American Community Survey. Besides the mandated uses, the local area detail from the ACS allows the Medicaid and CHIP programs to be more efficient. The data is used to identify the areas with the highest uninsured populations and allows for more efficient targeting of efforts to enroll those eligible. States and localities use these data to target outreach to the uninsured. The Department of Health and Human Services (HHS) makes available county and congressional district uninsured counts.<sup>1</sup>

In April 2012, HHS requested that OMB and the Census Bureau consider the addition of a health insurance exchange or premium subsidy question to the ACS. The proposed new question would focus on individuals securing health insurance through the state exchanges, with particular attention to those receiving a premium subsidy. The request stated that ... “This question would secure information critical to the Department’s, the Administration’s and states’ planning, implementation and evaluation of the role of the health insurance exchanges and the provision of subsidies to eligible individuals and families; provisions of the Patient Protection and Affordable Care Act (ACA) slated for full implementation beginning in CY 2014. The Congressional Budget Office (CBO) estimates that 81% of participants in an Exchange will receive a government subsidy to lower the cost of their premium.” The new question would be in addition to and not a replacement of the current health insurance question (Q16).

In May 2012 OMB and the Census Bureau reviewed the request and both concurred that HHS may proceed in working with the Census Bureau in developing versions of questions for testing for potential future use in the ACS. At that time both the Bureau and OMB understood the challenges with quantitatively testing the performance of potential questions on health insurance via a field test as is normally done before implementing question changes into the ACS, but required qualitative or cognitive testing of potential questions before deciding on a version for potential implementation for ACS production. Cognitive testing was then conducted in collaboration with testing done for potential health insurance exchanges and subsidy questions for the Current Population Survey’s Annual Social and Economic Supplement (CPS-ASES) in Massachusetts since it is the only jurisdiction with a fully functioning health insurance exchange program providing individuals access to insurance and premium subsidies. The final report from the ACS cognitive testing project is found in Attachment V. Given what was learned from the four rounds of CPS-ASES cognitive

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<sup>1</sup> For an example see: <http://www.cms.gov/Outreach-and-Education/Outreach/HIMarketplace/Census-Data-.html>

testing and the two rounds of ACS cognitive testing, the workgroup recommends that a two-part question ascertaining if there is a monthly health insurance premium and using the term “subsidy” be added to the ACS. The proposed question is as follows:

**G** Answer question 17a if this person is covered by health insurance. Otherwise, SKIP to question 18a.

**17** a. **Is there a monthly premium for this plan?**  
*A monthly premium is a fixed amount of money people pay each month to have health coverage. It does not include copays or other expenses such as prescription costs.*

Yes  
 No → SKIP to question 18a

b. **Is the cost of the premium subsidized based on family income?**

Yes  
 No

Adding this two-part question on premiums and subsidies is required to be able to identify people who are receiving premium tax credits or subsidies and are purchasing coverage through an Exchange. If this question is not added, there would be no way to directly identify the extent to which the ACA was successful in getting people who were eligible for premium tax credits to purchase insurance. Furthermore, omitting this new question would interfere with the interpretation of the health insurance categories currently collected in Question 16 of the ACS.

Cognitive testing indicated that there are many ways that respondents can report subsidized exchange plans on the ACS. One way that was common during cognitive interviews is for a respondent to reply 'yes' to direct purchase (item B in Q16) and to Medicaid/government assistance (item D in Q16). Other ways to report subsidized exchange plans during cognitive interviews was to use the other/specify write-in option (item H in Q16). Without the new premium and subsidy question, the Census Bureau would not be able to distinguish between subsidized exchanges and other direct purchase plans or Medicaid in many cases. Therefore, answer categories and resulting estimates of the source of health insurance from Question 16 will become invalid after the ACA goes into effect unless the ACS adopts the questions on subsidized premiums. Furthermore, previous analysis of the ACS has demonstrated challenges in interpreting 'direct purchase' (item B in Q16), with ACS estimates of this type of coverage that are much higher than other surveys. Without information enabling us to distinguish those receiving tax credit subsidies from unsubsidized



participants in the traditional direct purchase market (also called ‘non-group’ insurance), we may in fact have even less ability to analyze this group from item B in Q16. Thus, it is not simply an issue of maintaining the status quo in the survey; without accounting for this significant change in the insurance options for individuals in 2014 and beyond, the existing ACS survey items will be difficult to interpret.

#### *Modification to the Race Question*

The use of the term “Negro” in the “Black or African American” response category raised many concerns during the 2010 Census and this continues with the American Community Survey. Although Census 2000 results indicated that the term “Negro” was still relevant to some respondents, this relatively small proportion of respondents decreased for the 2010 Census, and is expected to continue to decrease in future censuses.

On August 8, 2012 the U.S. Census Bureau released results from the 2010 Census Alternative Questionnaire Experiment (AQE) Research on Race and Hispanic Origin. A major finding from the 2010 AQE research addresses the use of the term “Negro” in the “Black or African American” response category. The 2010 AQE found that none of the experimental panels that removed the term “Negro” saw a decrease in respondents reporting as “Black or African American.” From these results, as well as additional 2010 AQE focus group research, we expect that removing the term “Negro” will not impact the data for the Black population.

Therefore, the Census Bureau requests to remove the term “Negro” from the “Black, African Am., or Negro” response category beginning with the 2014 American Community Survey.

The final report “2010 Census Race and Hispanic Origin Alternative Questionnaire Experiment,” for the 2010 Census Program for Evaluations and Experiments (CPEX), can be found on the Census Bureau website at:

[http://www.census.gov/2010census/pdf/2010\\_Census\\_Race\\_HO\\_AQE.pdf](http://www.census.gov/2010census/pdf/2010_Census_Race_HO_AQE.pdf)

#### *Additional Classification of Housing Units Classified as “Other Vacants”*

A sizeable share of vacant units in both the 2010 Census and the 2010 American Community Survey (ACS) were classified as “other vacant.” This category represents units that were not occupied and did not fall into any of the following six vacancy status classifications: For rent; For Sale Only; Rented, not occupied; Sold, not occupied; For Seasonal, Recreational, or Occasional Use; For Migrant Workers. In 2011, the ACS reported that 32.0 percent of the total estimated number of vacant units were classified as “other vacant” housing units nationally. Federal, state, and local agencies, including the Department of Housing and Urban Development, are interested in more specific information about this component of the housing inventory often referred to as “the shadow inventory.” More precise information on reasons why these units are not currently on the market will facilitate a better assessment of the

current condition of the housing stock and improve methods for estimating the demand for new housing.

The Census Bureau proposes providing additional response categories to the ACS for Field Representatives to use when classifying housing units as “other vacant” to provide information that is more precise. We propose using the additional categories that are currently in use for the Housing Vacancy Survey, and that are planned for use in the 2013 American Housing Survey. These expanded categories are also being proposed for testing for the 2020 Decennial Census.

### *Removal of the Number of Times Married Question*

In August 2012, the Office of Management and Budget (OMB) in conjunction with the Census Bureau established a Subcommittee of the Interagency Council on Statistical Policy (ICSP) on the ACS. The ICSP Subcommittee on the ACS exists to advise the Chief Statistician at OMB and the Director of the Census Bureau on how the ACS can best fulfill its role in the portfolio of Federal household surveys and provide the most useful information with the least amount of burden. The charter of the subcommittee states that additions of questions to the ACS will not be considered without simultaneously considering the deletion of existing questions. In light of the request to add the question on health insurance premium and subsidies, the Census Bureau evaluated the justifications received in late 2012 by all Federal stakeholder agencies regarding the programmatic, regulatory, and mandatory justifications for the inclusion of every question on the ACS form, in order to identify potential candidate questions for deletion. Based on this review and discussions with staff from the Census Bureau and HHS, it was determined that the relative value of the proposed new health insurance premium and subsidy question outweighed the value of the number of times married question (Q22 on the 2013 ACS housing unit questionnaire), given the documented uses by HHS of data from the times married question. The Census Bureau therefore recommended that the number of times married question be removed from the survey in 2014 and beyond, and HHS and the ICSP Subcommittee on the ACS concurred with this recommendation. This recommendation was not made in time for inclusion in the Federal Register notice published on December 26, 2012 (78 FR, Pages 75971-75972) announcing our intention to submit this request and inviting public comment. However, notification of this proposed change will be included in the notice to be published in the Federal Register on or about the day this request is submitted to the Office of Management and Budget for review. This notice will also seek comment on the proposed changes.

## **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.<sup>2</sup> 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).<sup>3</sup>

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 is 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.<sup>4</sup> 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.<sup>5</sup>

The ACS provides more timely data for use in 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 2001<sup>6</sup>, uses the Census Bureau's Small Area Income and Poverty Estimates (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.<sup>7</sup> These flow patterns are used by both the FHWA and state transportation agencies to plan and fund new road and other travel infrastructure projects.

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2 See 42 USC 1437b and 1437f

3 HUD's funding formulas are available at: [http://www.huduser.org/portal/datasets/fmr/fmrover\\_071707R2.doc](http://www.huduser.org/portal/datasets/fmr/fmrover_071707R2.doc) and [http://www.huduser.org/portal/datasets/il/il10/IncomeLimitsBriefingMaterial\\_FY10.pdf](http://www.huduser.org/portal/datasets/il/il10/IncomeLimitsBriefingMaterial_FY10.pdf). The results of these formulas are announced yearly in the Federal Register.

4 See 42 USC 8621 through 8630

5 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](#).

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

7 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.

We 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 W.

### **3. Use of Information Technology**

We 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, keep respondent burden to a minimum. We 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 use CAPI technologies for both the HU and GQ Reinterview operations. Additionally, by continuing to offer 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. Self-response check-in rates<sup>8</sup> from the first few panels in 2013 using the new Internet response methods have been approximately 50%, which reflects a slight increase from previous methods that did not include an Internet response option. Additionally, Internet response is accounting for more than half (approximately 56%) of the self-response in early 2013.

### **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 has been properly notified of, as directed by law, and the OMB has 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.

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<sup>8</sup> The self-response check-in rate is a weighted estimate of the percentage of addresses responding by mail, telephone, or Internet to the ACS mail out. These rates are imperfect measures of public cooperation as they do not adjust for sample addresses that might not have been able to respond, for example those that were vacant, nonexistent, or addresses where the postal service had trouble delivering the questionnaire.

In addition, the OMB 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 an estimated 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 collects these data in a manner consistent with the OMB guidelines.

## **8. Consultations Outside the Agency**

In August 2012, the Office of Management and Budget (OMB) in conjunction with the Census Bureau established a Subcommittee of the Interagency Council on Statistical Policy (ICSP) on the ACS. The ICSP Subcommittee on the ACS exists to advise the Chief Statistician at OMB and the Director of the Census Bureau on how the ACS can best fulfill its role in the portfolio of Federal household surveys and provide the most useful information with the least amount of burden. It may also advise Census Bureau technical staff on issues they request the subcommittee to examine or that otherwise arise in discussions. The ICSP Subcommittee on the ACS reviewed the proposed 2014 ACS content changes and recommended their approval to the OMB and Census Bureau.

The content of the ACS is a result of extensive consultation during meetings with the ICSP Subcommittee on the ACS, the OMB Interagency Committee on the ACS, advisory committees, and other federal agencies.

In addition, we have met with the following people to discuss our plans:

Don Oellerich, Department of Health and Human Services  
Donald Moulds, Department of Health and Human Services

We published a notice in the *Federal Register* on December 26, 2012 inviting the public and other federal agencies to comment on our plans to submit this request. We received nine comments from the public.

Census felt that one comment was not relevant to the survey. While the responder's opinion is valued, their request to shut down the project and use past records as estimates for data products is not feasible.

One respondent objected to our intention to discontinue the use of the term "Negro" from the racial category "Black, African Am., or Negro." They felt that "African Am." should be dropped instead since that term presumes that only Blacks inhabit that continent. Our research shows that although the term "Negro" is still relevant to some respondents, this is a relatively small proportion of respondents that has decreased for the 2010 Census and is expected to continue to decrease in future censuses.

One respondent, representing a non-partisan research organization and policy institute, recommended that Census consider adding questions to the ACS to identify households that receive rental assistance and to determine if they are assisted through vouchers, public housing or some other type of assistance. We recognize the importance of this data but at this time, we are restricted in expanding the survey questions.

The other six comments were virtually identical in wording and content. These commenters feel that the "ACS is an intrusive questionnaire collecting data on the American people" and they opposed "the addition of a question on the ACA health insurance exchange or federal premium subsidies issued through the exchange" because they should not be required to reveal their personal decisions about using the government exchange or securing government premium subsidies to the federal government. These new questions on health insurance premiums and subsidies will provide critical information to the Department's, the Administration's and states' planning, implementation and evaluation of the role of health insurance exchanges and the provision of subsidies to eligible individuals and families. If the questions are not added, there would be no way to directly identify the extent to which the ACA was successful in getting people who were eligible for premium tax credits to purchase insurance and interfere with the interpretation of the health insurance categories currently collected in Question 16 of the ACS.

Given the timing of the decision to recommend removal of the number of times married question from the survey, we were unable to seek public input on this decision in the

December 26, 2012 Federal Register Notice. The public will have opportunity to comment on this proposed change in the notice to be published in the Federal Register on or about the day this request is submitted to the Office of Management and Budget for review.

## **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 is 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 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 explains the confidentiality of data collected and that participation is required by law. For all CAPI interviews, the interviewer gives 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 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 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 is interviewed to collect data about the GQ and to provide a list of residents in the GQ. This list is used to randomly select the sample of individuals to complete the ACS. The estimated time for each facility interview is 15 minutes. We 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 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 is 2,455,868 hours. See Table 1 on the following page for the detailed respondent and burden hour estimates.



**Table 1. Annual ACS Respondent and Burden Hour Estimates**

<b>Data Collection Operation</b>	<b>Forms or Instrument Used in Data Collection</b>	<b>Annual Estimated Number of Respondents</b>	<b>Estimated Minutes Per Respondent by Data Collection Activity</b>	<b>Annual Estimated Burden Hours</b>
<b>I.</b> 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>
<b>II.</b> ACS GQ Facility Questionnaire CAPI - Telephone and Personal Visit	CAPI GQFQ	20,000	15	5,000
<b>III.</b> ACS GQ CAPI Personal Interview or Telephone, and – Paper Self-response	CAPI, ACS-1(GQ), ACS-1(GQ) (PR)	200,000	25	83,333
<b>IV.</b> ACS Household Reinterview – CATI/CAPI	ACS HU-RI	43,200	10	7,200
<b>V.</b> ACS GQ GQ-level Reinterview – CATI/CAPI	ACS GQ-RI	2,000	10	335
<b>TOTALS</b>		<b>3,805,200</b>	<b>N/A</b>	<b>2,455,868</b>

**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**

Per the FY 2013 enacted budget, the estimated cost of the 2013 ACS is approximately \$225 million. The Census Bureau will pay the total cost of the ACS.

**15. Reason for Change in Burden**

We do not estimate any change in burden due to the 2014 content changes.

**16. Project Schedule**

The data collection activities for the 2014 Content will begin in late December 2013.

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.