

**ATTACHMENT G**

**ERS RESPONSE TO NASS COMMENTS**

## NASS Response to Rural Establishment Innovation Survey (REIS) OMB Docket

1. ***Production of Estimates and Projects*** – The OMB Standards and Guidelines for Statistical Surveys states that agencies must use accepted theory and methods when deriving direct survey based estimates, as well as model-based estimates and projections that use survey data. (Guideline 4.1) I recommend adding a statement that details how ERS will aggregate the survey responses to address the purpose of the survey, i.e. availability of skilled workers, clean energy, and mitigating remoteness. These issues are partially addressed in Needs and Uses, but they should be fleshed out to include calculations for survey estimates, or definitions of model based estimates, and variance calculations.

The discussion of Estimation Procedures is greatly expanded in Supporting Statement Part B, Section 2, Procedures for Collecting Information. The 5 central research questions are provided and the estimation procedures relevant to answering each question are discussed in detail.

2. ***Data Editing*** - A statement for data editing and review should be included. This could be incorporated into a CATI instrument or another software package after data collection. Edit checks should be written for consistency between questions, responses fall into a pre-specified range, and checking for inconsistency between estimates and outside sources such as the Bureau of Labor and Statistics data.

A description of data editing protocols for all survey modes is now included in Supporting Statement Part B, Section 2, Procedures for Collecting Information.

3. ***Disclosure*** – A disclosure policy should be documented so that information about a particular large establishment in a small area cannot be inferred from a publication.

The use of statistical disclosure limitation methods is now stipulated in Supporting Statement Part A Section 10.