

SUPPORTING STATEMENT – PART A

Survey of Registered Voters Living Overseas - 0704-TBD.

A. JUSTIFICATION

1. Need for the Information Collection

Legal Authorities. The President of the United States designated the Secretary of Defense to administer the *Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA) As Modified by the Military and Overseas Voting Empowerment Act*, 52 USC 20301¹. UOCAVA is the principal enabling statute that grants authority for the Department of Defense (DoD) to facilitate absentee voting amongst members of the Uniformed Services and Merchant Marine, their eligible family members and all citizens residing outside the United States who are absent from the United States. UOCAVA requires a statistical assessment on the voter registration and participation rates for members of the Uniformed Services as well as overseas civilians. The 1988 Executive Order 12642 names the Secretary of Defense as the “Presidential designee” for administering UOCAVA. In the Department of Defense Instruction 1000.04, *Federal Voting Assistance Program (FVAP)*, the Secretary of Defense delegated UOCAVA-related responsibilities first to the Undersecretary of Defense for Personnel and Readiness, and then, in turn, to the Director of the Federal Voting Assistance Program. The DoD Instruction 1000.04 also updates the policy and responsibilities for FVAP under Executive Order 12642.

Primary Objectives. The primary objective of the *Survey of Registered Voters Living Overseas*, conducted on behalf of the FVAP, is to refine FVAP’s methodology for estimating the number of overseas U.S. civilians who are eligible to vote and who have registered and participated in the past, and using these estimates to address the question of whether the registration and voting propensity of the overseas civilian population differs from that of a comparable domestic or military populations. Subsequent to each Presidential election year, FVAP must report voter registration and participation rates for uniformed service voters and overseas citizens to Congress. Previous attempts to collect information on the overseas citizen’s population to identify and measure its voter registration and participation rates in Federal elections suffered from significant bias; this effort is focused on developing a prototype method to report voter registration and participation rates from a more well-defined subgroup of overseas civilians. Conducting this research will help FVAP meet its federal and congressional mandates in terms of reporting annually on its activities and on overall voter registration and participation rates after each Presidential election. The data obtained through this study is also intended to provide insights into existing barriers to UOCAVA voting and recommendations for addressing these challenges.

To obtain the necessary information, the *Survey of Registered Voters Living Overseas* project will use data collected from a sample of registered overseas civilian voters in conjunction with previous country level estimates developed by FVAP research and establish a research method to assist FVAP in reporting voter registration and participation rates for the 2014 election.

2. Use of the Information

The sponsor of this research is FVAP. The primary user of the data/results will be FVAP. Additional potential users of the results could include the Office of the Secretary of Defense (OSD), other DoD senior staff and administrators, and the Defense Manpower Data Center (DMDC).

¹ Previously found in 42 USC 1973ff

FVAP issued a Request for Quote (RFQ - 881873) for research and analysis services to examine the demographic profile of registered overseas civilian voters, quantify the population of these voters by country, and calculate a voter registration and participation rate for the population using records from state and local election officials. To draw useful comparisons between eligible U.S. overseas civilians and similar domestic citizen voting age population (CVAP) or active-duty military (ADM) members, it is necessary to: (1) obtain estimates of the registration and voting rates of the overseas U.S. civilian population; (2) identify the demographic composition of the larger overseas U.S. civilian population; and (3) compare voting among overseas U.S. civilians to domestic civilians or ADM with similar characteristics. Demographic and economic information, such as age, relevant to voting behavior for domestic civilians is available from the U.S. census, and the FVAP Post-Election Survey provides similar data for the ADM population. However, much less data on these characteristics is available on the overseas U.S. civilian population. This project will use modeling methods to estimate some of these key demographic variables (e.g., gender, age) in the overseas U.S. civilian population. This will allow for an initial comparison of the voting behavior of eligible voters in the overseas U.S. civilian population with domestic CVAP and ADM populations who share similar characteristics.

It is expected that these estimates, although critical in describing eligible voters, are likely to be associated with considerable uncertainty given the limited data available from which to create these estimates. Therefore, to supplement this modeling work, FVAP is developing a prototype research method for creating comparisons of voting rates across a subpopulation of critical interest. Specifically, this prototype will include a survey of the overseas U.S. civilian registered voter population who have requested a ballot in 2014, focused on voting-relevant characteristics such as educational attainment, income, and mobility. This data will allow FVAP to compare with greater certainty the voting behaviors of overseas registered U.S. civilians to those of the registered CVAP and ADM population who share similar characteristics.

Conducting such a survey of registered absentee voter civilians living overseas at the time of the 2014 general election will allow for the collection of specific, accurate information on the demographic variables (such as age, gender, race/ethnicity, education, and mobility) necessary to make the comparisons between the overseas, domestic, and ADM populations that are so important to FVAP's mission. Obtaining demographic variables through a survey, rather than through an estimation plan, also provides the added value of providing an opportunity to collect additional data on awareness and voting behaviors that might help address complex and/or unexpected findings within and across countries. The survey will include questions grouped into four main categories:

- Where respondents are located
- Respondents' recent voting history
- Respondents' access to and use of media
- Demographic data

The survey instrument has been designed to parallel FVAP's Post-Election Survey of active-duty military members, as well as the Current Population Survey, facilitating FVAP's ability to compare the registration and voting behavior of the overseas U.S. civilian population, domestic CVAP, and ADM.

Past efforts to conduct surveys of the overseas civilian population have struggled with administration and response rate issues. However, past efforts attempted to reach the entire eligible overseas civilian population—while this might have been the population of interest, no frame exists for this population and conducting a survey without contact information for respondents can be extremely challenging. This survey will focus not on the “unframed” total population, but on the population of registered voters requesting overseas absentee ballots. This frame will be obtained from data in State voter history files. The sampling frame will be constructed from a nationwide list of all voters who are registered at an

overseas address and requested an absentee ballot be sent to an overseas address for the 2014 general election.

The strength of this approach is that the frame is based on information from voter history files. Because these are the files that States use to communicate with voters and send balloting materials, every single individual in the files has a mailing address that has been updated within the last few years (accounting for variation in State policies on updating and purging voter files). Using this relatively recent contact information increases the likelihood that the survey will be able to reach a representative sample of registered overseas ballot requesters and provide data necessary to make the comparisons between overseas and domestic registered voters.

As part of the survey administration, an initial sample of 5,000 respondents will be contacted as the first phase of this effort, using the actual survey instrument and administration plan, which will be used to examine the research methodology and ensure that the most effective mailing methods will be employed in the later phase of the survey. Once this initial phase is complete and the mailing methodology confirmed, the full survey will quickly follow to ensure minimal loss to the accuracy of the overseas address file.

3. Use of Information Technology

The *Survey of Registered Voters Living Overseas* will be conducted using a “push-to-web” methodology, to maximize the possible use of technology while not excluding respondents without online access. A recent survey of international tax filers by the IRS using a similar methodology found approximately 60% of respondents using the web option.² The frame of registered voters from which the sample for the survey will be drawn will not contain email address for all users, but will necessarily include a mailing address where the individuals can be sent ballot materials. All sampled respondents will be mailed a letter containing a web link and encouraging them to respond to the survey online. Sampled respondents for whom an email address is available will be sent an email invitation in addition to the mailed letter. Individuals who complete the online survey will not be asked for any additional paperwork or mailed any additional materials, and will benefit from the ease and efficiency of using an online survey interface. Later in the survey fielding, those respondents that did *not* complete the online survey will be sent a paper version of the survey to complete. This allows those respondents without online access (including those located in countries with limited Internet access) to complete the survey as well. These respondents who do not have access to the Internet or would prefer to complete the survey in paper form will not be excluded from the study, but will be able to complete the survey and return it via the mail.

4. Non-duplication

This project is unique in its methodology and areas of inquiry. There is no other federal agency tasked with collecting information specific to the populations covered by UOCAVA and, to date, no survey using this methodology has been conducted to collect data from registered voters living overseas.

A thorough review of the existing literature and data surrounding the UOCAVA voting process reveals that no research exists that is comparable to what is proposed in this project. In reviewing the existing body of research, it appears there is a dearth of research on UOCAVA voters, especially specific subtypes like civilian voters and members of military families. In the past, federal agencies including FVAP and the U.S. Census Bureau have attempted to survey citizens living overseas. However, the logistical and methodological problems inherent in such a task made these efforts unfeasible. A 2004 GAO report

² Tiffanie N. Reker, David C. Cico, and Saima S. Mehmood, “Taxpayer Experience of Individuals Living Abroad: Service Awareness, Use, Preferences, and Filing Behaviors”, <http://www.irs.gov/pub/irs-soi/12rescontaxpayexperience.pdf>

describes the difficulties the Census Bureau faced when attempting to reach overseas citizens in a pilot test (Overseas Enumeration Test Raises Need for Clear Policy Direction GAO-04-470), and FVAP's 2008 Post Election Survey Report described an effort to survey overseas citizens using the Department of State's voluntary "Warden Lists." Due to issues with the coverage and access to these lists, although FVAP attempted to sample over 10,000 American citizens living overseas, only 577 complete responses were returned. This effort's use of addresses from state voter files is a new way to access a subset of overseas citizens and will allow for federal government collection of data from a population that has been studied very little.

5. Burden on Small Business

The participants in this qualitative research for this data collection will be civilian UOCAVA voters. No data collection is being conducted with other businesses or establishments.

6. Less Frequent Collection

The proposed survey is a one-time activity to develop a research prototype method to report voter registration and participation rates of overseas civilians. If it is successful, this research prototype may serve as a template for similar future data collections, which will be subject to their own approval processes. Conducting this research is necessary to help FVAP meet its federal and congressional mandates in terms of reporting annually on its activities and on overall voter registration and participation rates after each Presidential election. Risks involved with a denial or limitation of this information collection process include not only impeding FVAP's ability to fulfill these mandates to report to Congress, but also impacting FVAP's ability to use data on the locations and voting activities of overseas civilians to identify barriers to voting unique to this population. The insights gained from this research will ultimately be used by FVAP's work to overcome voting obstacles and improve voting success rates among non-military UOCAVA voters by adjusting its internal programs and policies.

7. Paperwork Reduction Act Guidelines

There are no special circumstances. This collection will be conducted in a manner consistent with guidelines contained in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

- a. A 60-day Federal Register Notice was posted for public review in Federal Register Volume 79, No. 179, page 55436 on September 16, 2014. No public comments were received.
- b. A 30-day Federal Register Notice was published on Thursday, 02/19/15, Volume 80, No 33, page 8851.
- c. This is a one-time information collection and no other information collection reflecting this methodology has occurred. Consultations occurred based on past survey data from FVAP to scope this current effort and a review of external literature related to survey methodology and UOCAVA voting and application of best practices in the preparation and conduct of this information collection.

9. Gifts or Payment

The planned initial testing phase of the survey will test the usefulness of incentives in this effort. Like all surveys, there is concern that non-response, both to the survey as a whole as well as to specific questions, will undermine the accuracy of estimated voting propensity of the overseas registered population, and thus the validity of any comparisons made with Census data. Low response rates could undermine the accuracy of estimates by increasing sampling variability and thus uncertainty in how well the sample reflects the greater population. This problem would be reflected in larger confidence intervals around the estimates. More problematic, if non-response is systematically related to unobserved demographic or geographic characteristics that are also relevant to voting, is that the estimated model of participation may be invalid even if the final sample is large.

A common method of increasing response rates in surveys is to provide incentives during the initial contact of the potential respondent and/or on condition of completing the survey. The use of incentives in increasing response rates is well-documented in the literature.³ The incentive can take the form of a small cash payment or an in-kind gift. Incentives typically act as a gesture of goodwill and thus induce a socially favorable response and a sense of obligation in the recipient. Unfortunately, there is little research assessing the effectiveness of incentives in raising response rates in international surveys, and what little empirical work that has been done on the topic has reported inconsistent results.⁴

The symbolic nature of incentives and varying perceptions across cultures make it difficult to predict how overseas absentee ballot requesters will respond to specific types of incentives. Existing research has evaluated several types of incentives, including cash⁵, commemorative stamps⁶, and bookmarks⁷; these studies took place in several different countries and generally targeted participants who were not U.S. citizens. For this reason, the first phase of the survey will be used to assess the effect of cash and in-kind incentives on response for this particular population.

There is reason to believe that the effectiveness of an incentive scheme in inducing response will vary to a greater degree in a multicountry survey than in a survey of a population in a single country. Specifically, cash incentives in the form of U.S. dollars may be of little value to individuals who live in countries that use another currency. In addition, the potential cultural and political diversity of the overseas U.S. population that results from the population being spread over many different countries means that the effectiveness of in-kind incentives may vary based on host country. Finally, in countries whose mail systems are less reliable, there is a concern that mail may be tampered with and the incentive may not reach the potential respondent, thus raising cost with limited potential benefit.

Based on the previously cited research, three incentive options will be tested. This will allow for the exploration of the effects of different incentives on response rates overall and determining whether certain incentives minimize nonresponse error more than others.

The three incentive plans that will be closely examined in the initial phase of the survey are:

- No incentive

³ Singer, E., & Ye, C. (2013). The use and effects of incentives in surveys. *The ANNALS of the American Academy of Political and Social Science*, 645(1), 112-141.

⁴ Keown C.F. (1986) "Foreign Mail Surveys: Response rates using monetary incentives." *Journal of International Business Studies* 16: 151-153.

⁵ Armstrong J.S. and Yokum J.T. (1994) "Effectiveness of Monetary Incentives: Mail Surveys to Members of Multinational Professional Groups." *Industrial Marketing Management* 23: 133-136.

⁶ Dawson S. and Dickinson D. (1988) "Conducting International Mail Surveys: The Effect of Incentives on Response Rates with an Industry Population." *Journal of International Business Studies* 19(3): 491-496.

⁷ Jobber D., Mirza H., and Wee K.H. (1991) "Incentives and Response Rates to Cross-national Business Surveys: A Logit Model Analysis." 22(4): 711-721.

- \$2 bill
- FVAP-branded magnet (approximate value: \$0.50)

A preferred incentive program will be chosen based on both the observed response rates and the representativeness of the sample. If two or more incentive plans yield equivalent results, the most cost-effective option will be used. The full survey administration will utilize only this chosen incentive in its mailings to the full 40,000 individuals in the sampling frame. The value of the gift or incentive sent to each respondent will therefore be less than or equal to \$2.

10. Confidentiality

The information collection does not ask respondents to submit proprietary or trade secret information to the DoD. Respondents will be told that all information they provide will be kept private to the extent permitted by law. Furthermore, findings will be reported in the aggregate and specific characteristics will not be attributed to individual participants. Identifying information such as participants’ names, addresses, e-mail addresses, or phone numbers will not be used in association with the data used in reporting.

No Personally Identifiable Information will be collected as part of a qualifying information system so a Privacy Act System of Records Notice is not applicable.

11. Sensitive Questions

The data collection instruments contain no questions of a sensitive nature. The questions asked in the survey will be non-intrusive and will not explore any areas related to sensitive subjects, such as sexual behavior or attitudes, religious beliefs, or other matters that are commonly considered private. While the subject matter involves the processes and behaviors surrounding voting, the survey will not include questions about respondents’ political attitudes, their vote selections, or any other voting-related topics that could be considered controversial or private. Social Security numbers will not be collected. Respondents will be informed that their participation is voluntary and that their responses will be kept private and confidential. Responses will be reported in the aggregate, answers will not be attributed to individuals, and participants will not be identified in reports by name or by any other identifying information.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

Burden rates are calculated based on projected Not-to-Exceed figures for the respondents to complete either the online or paper survey, based on the upper bound of the expected percentage of sample members who will respond to the survey. The expected response rate is an approximation taken from the IRS’ survey of international tax filers.⁸

| Respondents | Registered overseas voters: First phase of survey | Registered overseas voters: Full survey administration | Registered overseas voters: Total (first phase + full) |
|--|--|---|---|
| Potential number of respondents | 5,000 | 40,000 | 45,000 |

⁸ Tiffanie N. Reker, David C. Cico, and Saima S. Mehmood, “Taxpayer Experience of Individuals Living Abroad: Service Awareness, Use, Preferences, and Filing Behaviors”, <http://www.irs.gov/pub/irs-soi/12rescontaxpayexperience.pdf>

| | | | |
|---|------------|------------|------------|
| Expected response rate (upper bound) | 40% | 40% | 40% |
| Expected number of respondents | 2,000 | 16,000 | 18,000 |
| Average length (minutes) | 10 minutes | 10 minutes | 10 minutes |
| Frequency of collection | 1 | 1 | 1 |
| Total burden | 333 hours | 2667 hours | 3000 hours |

b. Labor Cost of Respondent Burden

Since this is a one-time information collection all costs referenced below reflect the appropriate annual assessment of costs. Costs are based on estimated wages for civilians and local election officials.

| Respondents | Registered overseas voters: First phase of survey | Registered overseas voters: Full survey administration | Registered overseas voters: Total (first phase + full) |
|---|--|---|---|
| Potential Number of respondents | 5,000 | 40,000 | 45,000 |
| Expected response rate (upper bound) | 40% | 40% | 40% |
| Expected number of respondents | 2,000 | 16,000 | 18,000 |
| Hourly rate⁹ | \$24.57 | \$24.57 | \$24.57 |
| Labor cost per respondent | \$4.10 | \$4.10 | \$4.10 |
| Labor cost | \$8,181.81 | \$65,528.19 | \$73,710.00 |

13. Respondent Costs Other Than Burden Hour Costs

- a. There are no capital/startup costs.
- b. There are no operation and maintenance costs. No outside resources, consultations, or record retrieval are required to participate in either the ethnographies or individual interviews

14. Cost to the Federal Government

Since this is a one-time information collection, all costs referenced below reflect the appropriate annual assessment of costs. Estimates are based on costs incurred with managing this contract, coordinating authorization for this collection and monitoring contractor activities.

⁹ Average hourly wage from Bureau of Labor Statistics updated on November 7, 2014, available at: <http://www.bls.gov/news.release/empst.t19.htm>

FVAP Staffing Costs

| Title | GS Grade | Hourly Rate | Total Hours | |
|--------------|-----------------|--------------------|--------------------|--------------------|
| Supervisor | GS-15 | 59.89 | 85 | \$5090.65 |
| Researcher | GS-14 | 54.31 | 25 | \$1357.75 |
| Total | | | 205 | \$11,914.75 |

FVAP costs are based on two employees devoted to the project during the contract period. The Federal labor costs were estimated using the GS Salary Table for 2014.

Additional Costs: Estimated Contractor Staffing and Fieldwork Costs

Estimated costs for conducting the survey, including contractor labor to produce the survey, mail surveys, provide incentives (where applicable), and analyze data: \$1,227,913.14

15. Reasons for Change in Burden

The Supporting Statement for the *Survey of Registered Voters Living Overseas* is part of a submission package for a new collection rather than a renewal of an existing collection, so there is no change in burden.

16. Publication of Results

The duration of collection period is 02/01/2015 through 11/30/2015. Fors Marsh Group, LLC will present the research findings to FVAP and any other agencies or individuals at FVAP's direction. FVAP plans to release this research through its website.

17. Non-Display of OMB Expiration Date

This approval is not being requested.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

No exceptions to the Certificate Statement are being requested.