

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**U.S. Census Bureau**  
**American Community Survey Methods Panel Tests**  
**OMB Control No. 0607-0936**

**A. Justification**

**1. Necessity of the Information Collection**

The U.S. Census Bureau requests authorization from the Office of Management and Budget (OMB) to conduct the American Community Survey (ACS) Methods Panel Envelope Mandatory Messaging test.

**American Community Survey**

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In years past, the Census Bureau collected the long-form data only once every ten years and it became out of date over the course of the decade.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.

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 second mailing includes a letter and instruction card explaining how to complete the survey online. The Internet questionnaire (Attachment A) has space to collect detailed information for twenty people in the household. This mailing is also referred

to as the initial package.

The third mailing is a postcard 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, the American Community Survey Housing Unit (HU) Questionnaire Package is sent only to those sample addresses that have not completed the online questionnaire within two weeks and includes a paper copy of the questionnaire (Attachment B). This mailing is also referred to as the replacement package.

The fifth mailing is a postcard reminding respondents to complete the survey and a sixth mailing is another reminder postcard 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.

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.

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.

### **Envelope Mandatory Messaging Test**

The ACS collects detailed socioeconomic data from about 3.5 million households in the United States and 36,000 in Puerto Rico each year. The ACS also collects detailed socioeconomic data from about 195,000 residents living in Group Quarter (GQ) facilities. An ongoing data collection effort with an annual sample of this magnitude requires that the ACS continue research, testing and evaluations aimed at improving data quality, achieving survey cost efficiencies, and improving ACS questionnaire content and related data collection materials. The ACS Methods Panel is a research program that is designed to address and respond to issues and survey needs. One of those issues relates to respondent concerns about the tone of the mandatory message on the ACS mail materials.

The outside of the envelopes that contain the instructions to respond online and the

paper ACS questionnaire display the bold message, “YOUR RESPONSE IS REQUIRED BY LAW.” The prominent references to the mandatory participation in the ACS are concerning to many respondents. The Census Bureau developed the current presentation of the mandatory nature of participation based on previous research that identified a significant positive impact of these messages in encouraging high self-response rates and reducing the need for follow-up by phone or personal visits by Census Bureau interviewers. In order to be responsive to respondent concern with the prominence of the mandatory message on the envelopes, we are conducting the Envelope Mandatory Messaging Test.

This test will measure the impact of removing the phrase “YOUR RESPONSE IS REQUIRED BY LAW” from the envelopes (Attachment C) used to mail the initial package (second mailing) as well as the replacement package (fourth mailing). This phrase does not appear on other envelopes. We will continue to examine other possible revisions to the presentation of the mandatory nature of participation in the ACS, and will make future recommendations for additional testing.

We have divided the monthly production sample of 295,000 addresses in 24 nationally representative groups of approximately 12,000 addresses each. For this test, planned for the May 2015 ACS panel, we will use two randomly assigned groups for the experimental treatment group. The total sample size for the experimental treatment group is approximately 24,000 addresses. The remaining cases in the May 2015 panel will comprise the control and receive all standard ACS mailings (envelopes with the mandatory language still included). As we are using production cases for the test, the test will run through the complete three-month data collection period.

Our primary evaluation measure for this test is the self-response rate. Comparing the self-response rates between the two treatments allows us to detect at least a 1.0 percentage point difference with 80% power and  $\alpha=0.1$ ; this calculation assumes a 50% self-response rate. Additional metrics of interest include total response rate, the impact on hard-to-count groups, and the impact on ACS estimates. We will also conduct a cost analysis and examine CATI and CAPI workloads, including the number of visits needed to gain cooperation.

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

## **2. Needs and Uses**

The primary need for continued full implementation of the ACS is to provide comparable data at 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>1</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>2</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>3</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>4</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>5</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>6</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.

We will continue to examine the operational issues, research the data quality, collect

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1 See 42 USC 1437b and 1437f

2 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.

3 See 42 USC 8621 through 8630

4 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](#).

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

6 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.

cost information and make recommendations in the future for this annual data collection. The Envelope Mandatory Messaging Test will provide response information that will allow the Census Bureau to measure the effects on response, data quality, and cost impact to the ACS program of removing the mandatory message from the envelopes. We will continue to examine other possible revisions to the presentation in respondent materials of the mandatory nature of participation in the ACS, and will make future recommendations for additional testing.

Information quality is an integral part of the pre-dissemination review of the information disseminated by the Census Bureau (fully described in the Census Bureau's Information Quality Guidelines). Information quality is also integral to the information collections conducted by the Census Bureau and is incorporated into the clearance process required by the Paperwork Reduction Act of 1995.

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

We 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.

All sampled addresses will be mailed materials to request a response online. The Internet response option is available in English and Spanish. Households that do not respond online in a timely manner will also be mailed a paper questionnaire and reminder(s) urging response. Several of the mail pieces include a toll-free number to reach staff at the Telephone Questionnaire Assistance (TQA) center. In the TQA operation, interviewers can complete the ACS interview with a respondent using an automated data collection instrument. Additionally, several mailing pieces include a URL for the ACS where respondents can go to obtain more information about the ACS.

### **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.

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.

The ACS Methods Panel is the only testing vehicle for the ACS. There is no other program designed to improve the ACS or field test proposed content changes.

## **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. Every effort is taken to minimize the time needed for respondents 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.

This Envelope Mandatory Messaging test represents a one-time special test with a defined period for data collection.

## **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 content of the ACS is a result of extensive consultation during meetings with the ICSP Subcommittee for the ACS, advisory committees, and other federal agencies.

We also regularly consult with researchers from Westat, NORC, RTI and other survey and research firms as well as the University of Michigan's Institute for Survey Research and other academic institutions. In addition, staff regularly review survey methodology literature and attend conferences that present state-of-the-art methods and procedures.

In order to be responsive to these respondent concerns in a timely manner and expedite the implementation of this test, we are seeking approval to conduct this test under the emergency review process, and are requesting that OMB waive the requirement to provide a pre-submission notice in the *Federal Register*. Given that the planned date for mailing the first envelopes with the revised messages is April 27, 2015, we are seeking approval from OMB for the Envelope Mandatory Messaging test by April 24, 2015.

## **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 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 are presented with additional assurances of their confidentiality and security of their online responses.

Household members 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 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**

To field this test we will use the ACS production sample (clearance number: 0607-0810, expires 6/30/2016) with 295,000 sampled households. Of those sampled households, 24,000 will be sent experimental materials as part of this Envelope Mandatory Messaging test. The Census Bureau estimates that, for the average household, the ACS questionnaire will take 40 minutes to complete, including the time for reviewing the instructions and answers. There is no increase in burden from this test.

## **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 2015 President's Budget, the estimated cost of the ACS Methods Panel program is approximately \$9.045 million. The Census Bureau will pay all costs of the ACS Methods Panel test.

## **15. Reason for Change in Burden**

We do not estimate any change in burden due to this test.

## **16. Project Schedule**

The data collection activities for the Envelope Mandatory Messaging test will begin in late April 2015.

Approximately one month after the initial mailing, 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.

Preliminary results of the test are expected in July 2015.



**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.