

Cognitive Testing of Privacy Act Language  
Submitted Under Generic Clearance for Questionnaire Pretesting

**Request:** The Census Bureau plans to conduct additional research under the generic clearance for questionnaire pretesting research. We plan to conduct up to 40 cognitive interviews to evaluate language required by the Privacy Act of 1974. Along with the seven required elements required by the Paperwork Reduction Act (PRA), the Privacy Act requires that we inform respondents of two additional elements: 1) The published routine uses for which information is subject and a citation to the relevant Systems of Records Notice (SORN) and 2) the effects on the individual for not responding, if any. In addition, as time allows we plan to test messages about respondent confidentiality that have not been previously tested in Spanish and messages about data sharing between federal agencies that have not been previously tested in English or Spanish.

**Purpose:** The purpose of this cognitive research is to evaluate current and alternative versions of Privacy Act-required language in terms of readability and clarity, and to identify versions that may be more effective than others. It is also to test messages about respondent confidentiality that have not been previously tested in Spanish and messages about data sharing between federal agencies that have not been previously tested in English or Spanish. CSM is working closely with the Policy Coordination Office (PCO) and the results of this testing will be used to inform the writing of language to be used in future survey letters and other communication materials.

Interviewing will take place in one or two rounds. If findings from the first round indicate that changes need to be made to the statements, messages, and/or protocols we will conduct a second round interviews. The first round will consist of 15-30 interviews and the second round, if necessary will consist of 10-25 interviews.

**Population of Interest:** Residents of the United States and its territories.

**Timeline:** From October 2017 to April 2018, staff from the Center for Survey Measurement (CSM) will conduct cognitive interviews with up to 40 respondents. As needed throughout the interview period, CSM staff will update the interview protocol to address feedback from respondents.

**Sample:** We will focus on recruiting respondents who might have trouble with the paragraph such as those with low educational attainment. Half of respondents will be monolingual or bilingual Spanish speakers. We will also sample for diversity based on race, age, gender, nativity, and country of origin.

**Recruitment:** Respondents will be recruited from CSM's respondent database and through advertisements in local community organizations and through social media such as Craigslist.

CSM's database consists of respondents who have participated in previous cognitive testing. Recruits will be screened using CSM's approved generic screener.

**Location of Interviews:** Interviews will be conducted at the Census Bureau's Response Research Laboratory and at locations convenient to interviewees. The interviews will be conducted in-person in the local metropolitan area (DC, Maryland, Virginia).

**Protocol:** Four versions of the Privacy Act language are to be tested. The language of these versions is attached (see Enclosure 1: Privacy Act Testing Language). During and in between rounds the language could be changed in consultation with PCO staff. We plan to have participants read each of the versions and then probe their reactions to and understanding of each message. We will conduct our cognitive interviews using printed copies of the statements. We will present respondents with the messages, one at a time, and ask them to read each one. The first statement a respondent will see is in context as part of the FAQ on the back of survey invitation letter. There are two versions of this letter, one is an example of a voluntary survey and the other is an example of a mandatory survey. All other statements will be presented in isolation on a single sheet. As they read each message, we will ask them to think aloud about their reaction to the message. After reading each message, we will ask respondents questions about their interpretations of the message and probe about specific words and phrases they may find difficult to understand. We will vary the order in which participants are presented with the individual messages to control for potential order effects.

As time allows, respondents will be shown a series of brief messages about privacy, confidentiality, and data sharing (see Enclosure 2: Privacy and Confidentiality Messages). As they read each message, we will ask them to think aloud about their reaction to the message. After reading each message, we will ask respondents questions about their interpretations of the message. At the end of the interview, respondents will be asked general questions about their attitudes toward privacy, confidentiality, and government data collection and sharing. The protocol is enclosed here as Enclosure 3: Privacy Act Testing Cognitive Interview Protocol.

**Informed Consent:** We will inform participants that their response is voluntary and that the information they provide is confidential and will be accessed only by employees involved in the research project. The consent form will also indicate that the respondent agrees that the interview can be audio-taped to facilitate analysis of the results. Participants who do not consent to be audio-taped will still be allowed to participate. A copy of the consent form is attached (see Enclosure 4: Consent Form).

**Incentive:** Participants will receive \$40 for their participation in this research to offset costs such as travel and parking.

**Length of Interview:** We estimate 60-90 minutes per participant. (Respondents will be screened using the Census Bureau's generic screener; thus the burden hours for screenings are covered

under a separate request.) The total estimated participant burden for this request is 60 hours or less.

The following documents are included as attachments:

Privacy Act Testing Language (Enclosure 1)  
Privacy and Confidentiality Messages (Enclosure 2)  
Privacy Act Testing Cognitive Interview Protocol (Enclosure 3)  
Consent Form (Enclosure 4)

The contact person for questions regarding data collection and the design of this research is listed below:

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