

Generic Testing – SCOPE Confidentiality Testing

OMB No. 0535-0248

A. JUSTIFICATION

This mini-supporting statement is being submitted to OMB to define the need for conducting cognitive interviews under the Generic Testing docket. The Cybersecurity Enhancement Act of 2015 requires the installation of the Department of Homeland Security's Einstein cybersecurity protection system on all Federal civilian information technology systems by mid-December 2016. Combined with DHS' stated policies, it also potentially compromises the absolute nature of the Federal statistical system's (FSS) confidentiality pledges by no longer enabling statistical agencies to pledge that respondents' data will be seen only by a statistical agency's employees or its sworn agents. Consequently, the FSS needs to develop a revised confidentiality pledge(s) that informs respondents of this change in circumstances.

This required change in our pledges could easily decrease the response rates of NASS and other agency's surveys and adversely affect their quality, timeliness, and cost. It is possible that such a change may have differential effects on various classes of respondents such as households, small establishments, large establishments/enterprises, farmers and ranchers, educational or medical institutions, etc. NASS is working with an interagency group to share in research designs and findings. NASS will contribute to the understanding of the impact of these changes on establishment surveys.

Cognitive testing will be conducted to assess respondents' comprehension of, and reaction to, the revised pledge language. Through cognitive testing we will evaluate different wording options and determine which option will be the most effective in ensuring confidentiality and have the least negative impact on willingness to respond to NASS surveys. Three versions of the confidentiality pledge will be tested: 1) the current confidentiality pledge, 2) a conservative revision of the pledge and 3) a liberal revision of the pledge.

The primary cognitive testing will include 30 cognitive interviews. Half of the respondents will receive Protocol A, in which the conservative revision appears before the liberal review and the other half will receive Protocol B, in which the liberal revision appears before the conservative revision.

In addition, respondents participating in other NASS cognitive research efforts will be given Protocol C at the end of those studies. For example, 9 farm operators will be participating in a test to evaluate the vegetable survey. After probing on the vegetable survey has concluded, Protocol C will be completed.

The maximum number of respondents who will participate in this add-on research will be 9.

The cognitive interviews will address the following research questions:

- Do respondents comprehend the intent of the confidentiality pledges?
- Will changes to the pledge have an impact on the quality of data being reported and/or respondents' willingness to participate in NASS Censuses and surveys?
- Which changes to the confidentiality pledge will have minimal impact on willingness to respond to NASS Censuses and surveys?

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Cybersecurity Enhancement Act of 2015 requires the installation of the Department of Homeland Security's Einstein cybersecurity protection system on all Federal civilian information technology systems by mid-December 2016. Combined with DHS' stated policies, it also potentially compromises the absolute nature of the Federal statistical system's (FSS) confidentiality pledges by no longer enabling statistical agencies to pledge that respondents' data will be seen only by a statistical agency's employees or its sworn agents. Consequently, the FSS needs to develop a revised confidentiality pledge(s) that informs respondents of this change in circumstances. This required change in our pledges could easily decrease the response rates of NASS surveys and adversely affect their quality, timeliness, and cost. Cognitive testing will be conducted to assess respondents' comprehension of, and reaction to, the revised pledge language. Through cognitive testing we will evaluate different wording options and determine which option will be the most effective in ensuring confidentiality and have the least negative impact on willingness to respond to NASS surveys.

2. How, by whom, and for what purpose information is to be used.

The information gathered through cognitive interviews will be analyzed by our Research and Development Division to determine which wording option has minimal negative impact on willingness to response to NASS surveys. In addition, NASS will share knowledge obtained through this research with other statistical agencies as part of our work on the Statistical Community of Practice and Engagement (SCOPE) Confidentiality Pledge Revision Subcommittee.

3. Use of improved information technology.

The cognitive interviews will be conducted using face to face interviews and web interviews.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Operators selected for the cognitive interviews will be drawn from our list frame. We will contact operations who have not been involved in recent cognitive interview studies wherever possible. We do not normally collect information on the confidentiality pledge, so we do not have any information available on this topic.

5. Methods to minimize burden of small businesses.

We will attempt to conduct the cognitive interviews with operations of varying size. Any modifications to the confidentiality pledge will impact all operations in future NASS Censuses and surveys, regardless of size.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Unless otherwise directed by OMB or the subcommittee, this one time testing data collection will only be conducted during 2016.

7. Special circumstances.

There are no special circumstances associated with this information collection.

8. Federal register notice and consultation with outside persons.

Not applicable.

9. Payments or gifts to respondents.

There are no payments or gifts to respondents.

10. Confidentiality provided to respondents.

Information about, and data provided by, participants in NASS cognitive interview studies are kept confidential and only shared with the researchers working on the study.

11. Questions of a sensitive nature.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

The tests will be conducted by trained cognitive interviewers to make sure that the respondents understand the intent of each question and that they are able to provide the requested information. Each interview will last a maximum of 1 hour.

	Number of Respondents	Hours per Interview	Total Burden Hours
Primary Cognitive Testing	30	1	30
Add-on to other studies	9	.5	4.5

Cost to the public of completing the interview is assumed to be comparable to the hourly rate of those requesting the data. Reporting time of 34.5 hours are multiplied by \$25 per hour for a total cost to the public of \$862.50.

NASS regularly checks the Bureau of Labor Statistics' [Occupational Employment Statistics](#) (Published March 30, 2016). Mean wage rates for bookkeepers, farm managers, and farm supervisors are averaged to obtain the wage for the burden cost. The May 2015 mean wage for bookkeepers is \$18.74. The mean wage for farm managers is \$33.60. The mean wage for farm supervisors is \$23.22. The mean wage of the three is \$25.19.

13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

- 14. Provide estimates of annualized cost to the Federal government; provide a description of the method used to estimate cost which should include quantification of hours, operational expenses (equipment, overhead, printing, and staff), and any other expense that would not have been incurred without this collection of information.**

Costs for conducting the cognitive interviews are estimated at \$12,000. This will cover expenses for staff payroll, travel, conducting the interviews, analysis and summary of findings and any other expenses that may be incurred while updating survey materials based on our findings. Several NASS employees who have been trained in conducting cognitive interviews will travel to the operations in the selected states to conduct the interviews.

- 15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I (reasons for changes in burden).**

This mini-supporting statement addresses the use of burden to conduct cognitive testing for the SCOPE testing.

- 16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

No data from this test will be published. Summarized results and information about the cognitive interviews will be provided to the subcommittee and may be presented at national conferences and presented in peer reviewed journals.

- 17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

There is no request for approval of non-display of the expiration date.

- 18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-I.**

There are no exceptions to the certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS:

1. Respondent universe, sampling and response rate.

The SCOPE testing will include any potential respondents to NASS Censuses or Surveys, in locations selected to minimize interviewer travel time and costs.

2. Procedures for the collection of information.

Interviewers will follow standard cognitive interviewing techniques as defined in the original Supporting Statement Part A for the Generic Clearance docket (0535-0248).

3. Information collected adequate for intended uses.

Non-response is not expected to be an issue for this test.

4. Test of procedures or methods.

Not applicable.

5. Individuals consulted on statistical aspects of survey.

NASS is working with the Statistical Community of Practice and Engagement (SCOPE) Confidentiality Pledge Revision Subcommittee, which includes Paul Bugg (OMB).

Selection of methods of testing and providing of training is done by the Research and Development Division; Heather Ridolfo, (202) 690-3228.

June, 2016