

Response to Terms of Clearance

1. *While OMB acknowledges the improvement in the quality and completeness of the survey data that EAC collected in 2008, OMB remains concerned about data quality.*

For the 2012 iteration of the survey, EAC developed a electronic data entry template used by the States that contained over 60 checks for data inconsistencies and errors. Additionally, upon receiving the data from the States, an additional 140 rules for consistency and errors were applied at the jurisdictional level (e.g., counties for most States, townships or citywards for some States), and at the aggregate State level (i.e., aggregated across all jurisdictions to arrive at State totals). This is also noted in the EAC PRA submission, in Justification, Part A, Question 3.

The improved data entry template and the additional checks for inconsistencies and errors resulted in an increase in the response rate at the jurisdictional level of between 5% to 10% as compared to the 2010 responses for many questionnaire items (e.g., from a response rate of 86.4% in 2010 to 92.5% in 2012).

In 2014, EAC will use the same contractor and many of the same contractor staff as were used for the 2010 and 2012 surveys. This results in a continuity of technical assistance that the contractor provides; the rapport and professional relationships established in past surveys will yield benefits in data quality for 2014.

2. *Since EAC is not employing statistical methods to generate survey results that are representative of the surveyed population, the 2010 UOCAVA Report to Congress should describe the limits of the survey data and include conspicuous and appropriate caveats about drawing conclusions from the data.*

This information collection is a **census** data collection effort. That is, EAC asks every State, four territories, and the District of Columbia to respond to the questionnaire, and **supply data for every jurisdiction** in that State, territory, and the District. There is no sampling involved and, thus, no statistics that require generalization. EAC obtains data from the entire population of voting jurisdictions.

EAC compiles the data provided from the States for use in its reports (pursuant to HAVA Section 703, which relates directly to UOCAVA data). To provide a context EAC notes its census approach in all of its reports, along with caveats about missing data and cautionary notes regarding attempts to draw conclusions based on incomplete data sets.

Further, EAC dedicates a portion of its reports (and an online FAQ sheet) to informing readers about the States' data and issues related to States' non-response, demonstrating EAC's responsibility to inform all readers of States' data-related issues. To provide context for the numbers appearing in the reports, EAC performs *some* descriptive analysis. However, EAC makes the raw data publicly available so readers may perform their own statistical analyses. EAC will continue to include the previously noted caveats in its 2014 report to Congress and on its website. (This is also noted in the EAC PRA submission, in the Justification section, Part B, Question 1.)

Despite the fact that this data collection is a census of all jurisdictions, there are missing data. Data are missing primarily for three reasons: (1) the information sought is "not applicable" because the State does not possess that feature in its election process (such as election-day or same-day registration and voting); (2) the data may be "not available" because a State's recordkeeping systems do not automatically capture a particular datum and collating the data manually would be too costly; (3) missing due to data entry error on the part of the State.

For 2014, EAC will conduct a "per-item response-rate analysis" in order to further refine and address the issue of missing values.

3. *Specifically, EAC should*

3.1. *(1) implement basic consistency checks (rather than publish negative numbers in tables) and calculate percentages that have numerators and denominators reflecting the same responding jurisdictions*

As noted above, EAC did this for the 2012 data collection and will expand on this capability for the 2014 data collection. The 2014 system will have a refined set of over 200 rules for internal consistency, applied to jurisdictions and State aggregate totals, and an additional set of rules to be applied to the FVAP questions that have been incorporated into the instrument. Furthermore, EAC will examine data obtained on the 2014 elections with those obtained in the 2010 elections (the previous mid-term election cycle) as a way to catch outliers and more granular errors. Additionally for 2014, EAC will refine the definition and meaning of (a) data not available; (b) data not applicable; and (c) missing data.

3.2. *(2) acknowledge the limitations of each conclusion in the report that cannot be supported by robust data. EAC should also identify State-reported figures (by, for example, stating that "States reported..."), distinguishing them from EAC conclusions.*

All three reports in the EAC survey report series have described the data contained in the tables. All statements made in the reports are based on facts found in the data, aggregated at the State level. EAC does not draw any inferences or conclusions from the data; all data represent State-reported figures. Any further analysis and commentary is left up to the discretion of stakeholders and researchers to conduct and report on.

4. *OMB requests that EAC share a draft of the report prior to its submission to Congress.*

The States must submit their initial data for the quantitative portion of the survey by February 1. EAC runs consistency checks on the data, notifies the States of any identified issues and the States must return revised data no later than March 1. In 2012, the dataset contained approximately 7.3 million data points.

For 2014, EAC is combining the NVRA, the UOCAVA, and the EAVS reports into one consolidated volume, to be delivered to Congress no later than June 30, 2015.

Additionally, EAC will be transmitting the data related to the FVAP questions (incorporated into the EAVS for 2014) to FVAP on March 2, March 16, and April 1, 2015, so that FVAP can fulfill its reporting requirements.

To deliver the final report to Congress on June 30, 2015, EAC must submit a final draft submitted to the Government Printing Office (GPO) for design, typesetting, and 508 compliance, **by May 15, 2015**. EAC will provide to OMB a courtesy copy of that final draft submitted to the GPO at that time.

5. *In addition, OMB requests that EAC coordinate with DoD to identify overlap between EAC's Election Day Survey and DoD's "Post-Election Survey of Overseas and Post-Election Survey of Local Election Officials" to avoid duplicative efforts.*

This has been done for 2014, (as described in the PRA Justification Part A), and is reflect in the revised instrument that was part of the OMB submission. Substantial thought and discussion occurred in order to add the FVAP questions to the EAVS, with EAC and DOD collaborating to achieve this integration. EAC will use those FVAP questions that are similar to the EAVS items as additional checks on data quality and consistency.