

SUPPORTING STATEMENT
U.S. Department of Commerce
U.S. Census Bureau
The American Community Survey
OMB Control No. 0607-0810

A. Justification

1. Necessity of the Information Collection

The U.S. Census Bureau requests authorization from the Office of Management and Budget (OMB) for revisions to the American Community Survey (ACS). 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 formerly 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, tribal, 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In years past, the Census Bureau collected the long-form data only once every ten years and it became out of date over the course of the decade.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 uniform data available about social, economic, housing, and demographic characteristics 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.

The ACS began providing up-to-date profiles in 2006 for areas and population groups of 65,000 or more people, providing policymakers, planners, and service providers in the public and private sectors with information every year—not just every ten years. The ACS program provides estimates annually for all states and for all medium and large cities, counties, and metropolitan areas. For smaller areas and population groups, it takes three to five years to accumulate information to provide accurate estimates. The first three-year estimates were released in 2008; the first five-year estimates in 2010. ACS three-year estimates have been discontinued. Every community in the nation continues to receive a detailed, statistical portrait of its social, economic, housing, and demographic characteristics each year through one-year and

five-year ACS products.

Using the Master Address File (MAF) from the decennial census, which is updated each year, we select a sample of addresses and mail survey materials each month to a new group of potential households. Most households are asked first to complete the survey via the internet, with a paper questionnaire provided to those households that do not respond via internet. We then select a sub-sample of the remaining households that have not responded either by mail or internet, and designate the household for a personal interview. Typically, for personal interviews, we sample at a rate of one in three. We also conduct interviews with a sample of residents at selected group quarters (GQ) facilities. Collecting these data from a new sample of housing units (HUs) and GQ facilities every month provides more timely data and lessens respondent burden in the decennial census.

We release a yearly microdata file, similar to the Public Use Microdata Sample file of the Census 2000 long-form records (Census 2000 was the last decennial census that included a long form for data collection). In addition, we produce total population summary tabulations similar to the Census 2000 tabulations down to the block group level. The microdata files, tabulated files, and their associated documentation are available through the internet.

In January 2005, the Census Bureau began full implementation of the ACS in households with a sample of approximately 250,000 addresses per month in the 50 states and the District of Columbia. In addition, we select approximately 3,000 residential addresses per month in Puerto Rico and refer to the survey as the Puerto Rico Community Survey (PRCS).

In January 2006, the Census Bureau implemented ACS data collection for the entire national population by including a sample of 20,000 GQ facilities and a sample of 200,000 residents living in GQ facilities in the 50 states and the District of Columbia along with the annual household sample. A sample of 100 GQs and 1,000 GQ residents was also selected for participation in the PRCS.

Starting with the June 2011 mail panel, the Census Bureau increased the annual sample size for the ACS to 3,540,000 addresses (or 295,000 addresses per month) in the 50 states and the District of Columbia.

The goals of the ACS and PRCS are to:

- Provide federal, state, tribal, and local governments an information base for the administration and evaluation of government programs; and
- Provide data users with timely demographic, housing, social, and economic data updated every year that can be compared across states, communities, and population groups.

ACS Household Data Collection

Historically, the ACS had employed a tri-modal data collection strategy for household data collection—mail, telephone and personal visit. In 2011, the Census Bureau conducted two tests to assess the feasibility of providing an internet response option to households that receive survey materials by mail. Based on the results of these tests, the Census Bureau implemented an internet response option for the ACS for the start of the 2013 data collection.

In October 2017, to ensure the ACS program was executed in the most efficient and cost-effective manner, the Census Bureau discontinued conducting ACS nonresponse followup operations via computer-assisted telephone interviewing (CATI). Several ACS operations continue to make use of the telephone mode: Telephone Questionnaire Assistance (TQA), Failed Edit Followup (FEFU), and centralized reinterview operations.

In May 2017, the Census Bureau conducted a Pressure Seal Mailing Materials Test. Based on the results of this test, we plan to implement pressure seal mailers for the second and fifth mailings in 2018.

For households eligible to receive survey materials by mail, the first contact (Attachment A) includes a letter and instruction card explaining how to complete the survey online. Also included are a Frequently Asked Questions (FAQ) brochure and a brochure that provides basic information about the survey in English, Spanish, Russian, Chinese, Vietnamese, and Korean, and provides a phone number to call for assistance in each language. The instruction card provides the information on how to respond in English and Spanish. The letter explains that if the respondent is unable to complete the survey online, a paper questionnaire will be sent later. The internet version of the questionnaire is available in English and Spanish and includes questions about the HU and the people living in the HU. The internet questionnaire (Attachment B) has space to collect detailed information for twenty people in the household.

The second mailing is a letter (Attachment C) 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 at a later date if we do not receive their response. This letter includes clear instructions to log in, including an explicit reference to the user identification number. We plan to utilize a pressure seal mailer for this letter.

In a third mailing (Attachment D), the American Community Survey Household (HU) Questionnaire Package is sent only to those sample addresses that have not completed the online questionnaire within two weeks. The content includes a follow up letter, a paper copy of the questionnaire, an instruction card for completing the survey online, an FAQ brochure, and a return envelope. The cover letter with this questionnaire package reminds the household of the importance of the ACS, and asks them to

respond soon either by completing the survey online or by returning a completed paper questionnaire.

The fourth mailing (Attachment E) is a postcard that reminds respondents that “now is the time to complete the survey,” informs them that an interviewer may contact them if they do not complete the survey, and reminds them of the importance of the ACS.

A fifth mailing (Attachment F) is sent to respondents who have not completed the survey within five weeks. This mailing reminds these respondents to return their questionnaires and thanks them if they have already done so. This letter includes clear instructions to log in, including an explicit reference to the user identification number. We plan to utilize a pressure seal mailer for this mailing.

A sixth mailing is sent to those respondents who request a replacement package in Spanish. Similar to the third mailing, but in Spanish, the content includes an introductory letter, a paper copy of the questionnaire, an instruction card for completing the survey online, an FAQ brochure, a follow up letter, and a return envelope. The cover letter with this questionnaire package reminds the household of the importance of the ACS, and asks them to respond soon either by completing the survey online or by returning a completed paper questionnaire.

A second reminder postcard is sent a few days after this mailing emphasizing the importance of completing this survey.

If we do not receive the completed questionnaire by the cut-off date, an additional reminder postcard is sent.

All of the materials that are sent to respondents who request a replacement package in Spanish, including related reminder postcards, are included in Attachment G.

For sample housing units in Puerto Rico, a different mail strategy is employed. Based on the results of testing in 2011 and concerns with the resulting internet response rates from that testing, we deferred the introduction of an internet response option in order to further assess the best implementation approach. Therefore, we continue to use the previously used mail strategy with no references to an internet response option. Our first Puerto Rico mailing includes a pre-notice letter in Spanish and English.

The second Puerto Rico mailing includes an introductory letter, an FAQ brochure, a copy of the paper questionnaire, an instruction booklet, and a return envelope.

The third Puerto Rico mailing is a reminder postcard.

The fourth Puerto Rico mailing is a replacement package similar to the second mailing and is mailed only to non-respondents.

The fifth Puerto Rico mailing is a reminder postcard that is mailed only to non-respondents.

All of the materials that are sent to respondents in Puerto Rico, including related reminder postcards, are included in Attachment H. We are not using pressure seal mailers for Puerto Rico mailings.

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). CAPI instruments are available to interviewers in English and Spanish. We also conduct a CAPI-only operation to collect ACS data from sampled HUs in remote areas of Alaska.

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. Respondents may call the ACS toll free TQA numbers listed on various ACS mail materials. The TQA staff answers respondent questions and/or completes the entire ACS interview using a computer-assisted telephone interview (CATI) instrument. Interested households may request a survey form in Spanish (Attachment G) by calling our TQA center. For Puerto Rico households, we mail a Spanish version of the questionnaire. Upon request through TQA, respondents are mailed an English version of the PRCS questionnaire and appropriate informational materials (Attachment I).

Previously, we conducted a CATI Failed Edit Follow-up (FEFU) if we had a telephone number and either: 1) respondents omitted answering a set of critical questions that are deemed essential for the questionnaire to be considered complete; or 2) the household had more than five people so that we could obtain information for the additional members of the household. Starting in October 2012, we scaled back the FEFU operation to focus on only households with coverage problems (such as mail respondents with more than 5 people, mail respondents with more people listed on the cover than in the basic demographic section, or questionnaires returned for vacant units). We also use the FEFU operation to confirm the status of internet responses classified as businesses or vacant units and to collect the minimum amount of information needed to further process the questionnaire. If funding allows, we would resume FEFU for mail and internet returns missing responses to critical questions. The FEFU instrument (Attachment J) is available to interviewers in both English and Spanish.

We also collect information from HUs identified as vacant. We ask a knowledgeable contact to answer the housing questions on the ACS questionnaire along with some additional questions for these units. Questions asked on the ACS household CAPI instrument that are worded differently and those asked in addition to the questions on

the household ACS questionnaire for vacant units are included in Attachment K. We conduct a reinterview operation to monitor Field Representative (FR) performance. Only households that provide an interview via CAPI are eligible for this reinterview. For the household reinterview operation, we use a separate set of questions for units that were identified as occupied, vacant, or noninterview at the time of the original CAPI interview. Reinterviews are initially conducted via a centralized CATI operation. Reinterview cases are transferred to the regional offices for personal visit interviewing if they cannot be resolved via the telephone attempts. The household ACS Reinterview questions are included in Attachment L.

CAPI interviewers have several tools available to explain the ACS to households, including an introductory letter, a thank you letter, a short explanatory brochure, and a longer brochure in question and answer format. Each of these materials is available in English, Spanish, Arabic, Simplified Chinese, French, Haitian-Creole, Korean, Polish, Portuguese, Russian, and Vietnamese. The Census Bureau also provides letters for reluctant CAPI respondents in English, Spanish, Korean, Simplified Chinese, Russian, and Vietnamese. These letters and brochures can be found in Attachment M.

ACS Group Quarters (GQ) Collection

In addition to selecting a sample of residential addresses, we select a sample of GQs. An introductory letter and FAQ brochure for the facility administrator are mailed to the sample GQ approximately two weeks prior to the period when a field representative (FR) may begin making contact with the GQ. The FR gives the facility contact person a thank you letter when they arrive for the interview. The introductory letters, FAQ brochures, and thank you letters can be found in Attachment N. The FRs use the CAPI Group Quarters Facility Questionnaire (GQFQ) in English or Spanish when making initial telephone contact to schedule an appointment to conduct a personal visit at the sample GQ and also use a GQ listing sheet to generate the sub-sample of persons for ACS interviews. The GQFQ questions and listing sheets can be found in Attachment O.

We use a subset of the ACS HU questions to conduct interviews with sample residents in GQs. Resident-level personal interviews with sampled GQ residents are conducted using CAPI, but bilingual paper questionnaires can also be used for self-response. The GQ CAPI and paper questionnaires contain questions for one person. The GQ resident data collection packages (Attachment P) include an introductory letter, a bilingual Confidentiality Notice, a paper questionnaire (for self-response only), an instruction guide for completing the paper form, a thank you letter, and a copy of the ACS GQ brochure. We conduct a separate operation to collect ACS GQ data from sampled GQs in Federal Prisons and in remote Alaska.

For Puerto Rico sample GQ residents, we use PRCS data collection packages (Attachment Q) to collect the GQ data.

We conduct a GQ reinterview (RI) operation to monitor the performance of FRs in conducting the GQFQ interviews. For the GQ RI operation, we use a separate set of questions to verify and monitor the FR interviews at the GQ level (Attachment R). Similarly to the housing unit RI operation, GQ RIs are initially conducted via a centralized telephone operation. Reinterview cases are transferred to the regional offices for personal visit interviewing if they cannot be resolved via the telephone attempts.

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

Changes in ACS Content for 2019

The American Community Survey (ACS) is one of the Department of Commerce's most valuable data products, used extensively by businesses, non-governmental organizations (NGOs), local governments, and many federal agencies. In conducting this survey, the Census Bureau's top priority is respecting the time and privacy of the people providing information while preserving its value to the public.

The content of the proposed 2019 ACS questionnaire and data collection instruments for both Housing Unit and Group Quarters operations reflect changes to content and instructions that were proposed primarily as a result of the 2016 ACS Content Test, but also as a result of interagency consultation. The Census Bureau periodically conducts tests of new and improved survey content to ensure the ACS is meeting the data needs of its stakeholders. The primary objective of content tests is to test whether changes to question wording, response categories, and definitions of underlying constructs improve the quality of data collected. The Census Bureau also regularly participates in interagency meetings with various Federal agencies that sponsor the content of the ACS. Those meetings provide the opportunity to ensure that the ACS content remains relevant and is reflective of current policies and regulations.

The 2019 survey content changes cover several topics, as discussed briefly below.

Telephone Service

The rise of cell phone and smartphone usage, and other complex and varied telephone services and equipment, has changed how Americans view and use telephones in a household. Research also suggests that some respondents, or in some cases interviewers, may not fully understand the current wording, the additional instructions that accompany the question, or what the question is intending to capture. To make the intent of the telephone service question easier to understand by respondents and interviewers, the question was made a stand-alone question and additional instructions are provided on the types of telephones

and equipment respondents should include when answering the question. Currently, telephone service is asked as part of a broader question on housing characteristics.

Health Insurance

A question on Health Insurance Premiums and Subsidies will be introduced to the ACS, immediately following the current question on health insurance coverage. The question on premiums and subsidies asks if a person pays a health insurance premium, and if so, if he or she received a subsidy to help pay the premium. This question will provide more accurate information about coverage categories than available from the existing ACS question on current coverage alone. These data will enhance the ability of the U.S. Department of Health and Human Services (HHS) and the states to administer Medicaid, CHIP, and the exchanges, and monitor private insurance coverage.

In addition, one response option for the health insurance question will be changed as a result of consultation with the U.S. Department of Veterans Affairs (VA). In July 2017, the VA contacted the Census Bureau and requested a change to the VA response option on the health insurance question. The proposed change is to ensure the accuracy of the estimates of VA health insurance coverage. The VA response option for the health insurance question will be truncated from “VA (including those who have ever used or enrolled for VA health care)” to “VA (including those who have enrolled for VA health care).”

Journey to Work

Changes to the Commute Mode question were motivated by changes in public transportation infrastructure across the United States, particularly, the increased prevalence of light rail systems and the need to update and clarify the terminology used to refer to commute modes that appear as categories on the ACS. To improve the Commute Mode question, some of the public transportation modes were modified. The category “Streetcar or trolley car” was changed to “Light rail, street car, or trolley,” “Subway or elevated” was changed to “Subway or Elevated Rail,” and “Railroad” was changed to “Long-distance train or commuter rail.” These three rail-related categories were also slightly reordered so that “Subway or elevated rail,” the most prevalent rail mode, is listed first. The phrase “trolley bus” was dropped and the phrase “work at home” was changed to “work from home.” The subheading of instructions was simplified to read “Mark ONE box for the method of transportation used for most of the distance.” The question about Time of Departure has historically raised concerns about privacy due to the reference to leaving home. To phrase the question in a less intrusive way, the question was changed to ask what time the person’s trip to work began and to remove the word “home.”

Weeks Worked

The changes to the question on the number of weeks worked were made to allow the Census Bureau to provide high-quality, continuous measures for the number of weeks worked, such as means, medians, and aggregates. In addition, the changes enable additional specificity for weeks worked, particularly with hours worked, income, and occupation. Part A of the question regarding the time period of interest was rephrased from working “50 or more weeks” to “EVERY week” and additional information is provided in the second sentence. The original instruction of “Count paid time off as work” was changed to “Count paid time vacation, paid sick leave, and military service as work.” For part B of the question, the response option was changed to a write-in response, the reference period (“the PAST 12 MONTHS”) is repeated, and new guidance clarifies what to count as work.

Class of Worker

Changes to the Class of Worker question improve question clarity, clarify the definition of unpaid family workers, explicitly define a category for Active Duty military, improve question wording and categories, and improve the layout of the question. Response categories were grouped under three general headings. “Active Duty” was added as one of the response categories in the government section, and the “Active Duty” checkbox was dropped from the Employer Name question. Question and response category wording were revised for clarity. To signal that all six employment characteristics questions refer to the same job (including industry and occupation), the series was renumbered from separate questions to a single series with sub questions. Lastly, the instructional text and heading for the series immediately preceding Class of Worker was simplified.

Industry and Occupation

Ongoing research of the Industry and Occupation write-in responses has demonstrated that the questions were unclear and confusing to respondents, who were unable to answer or answer with sufficient clarity to provide useful data. To increase clarity and improve occupational specificity, these questions were revised to include new and consistent examples, in terms of content and length, and modified question wording. The number of characters for write-in responses about “Job Duties” was expanded from 60 to 100 characters.

Retirement Income

Over the last 40 years, defined contribution retirement plans have become increasingly common while defined benefit plans (such as pensions) have become

less so. Federal surveys have lagged in addressing these newer forms of retirement income and subsequently underreport retirement income. The Retirement, Survivor, and Disability income question was changed to improve income reporting, increase item response rates, reduce reporting errors, and update questions on retirement income and the income generated from retirement accounts and all other assets in order to better measure retirement income data. The question was expanded to ask about “*retirement income, pensions, survivor or disability income.*” In addition, the instructions that accompany the question were expanded to note that income from “*a previous employer or union, or any regular withdrawals or distributions from IRA, Roth IRA, 401(k), 403(b) or other accounts specifically designed for retirement*” should be included.

Relationship

For several years, the Census Bureau has been testing revised relationship questions to improve the estimates of coupled households. The 1990 Census first introduced unmarried partner as a response category to the relationship to householder question. The 2000 and 2010 Censuses built upon this work, changing the processing of the Relationship question to more accurately represent same-sex couples. The Census Bureau discovered a statistical error in the 2010 Census data that resulted from opposite-sex couples mismarking their sex. This error has the potential to inflate the estimates of same-sex married couple households. The Census Bureau released a set of modified state-level same-sex household estimates from the 2010 Census due to this error, but also began new research efforts to improve the relationship question.

The Relationship question has been revised to improve measurement of same-sex couples. The existing “Husband or wife” and “Unmarried partner” response categories were each split into two versions: “Opposite-sex husband/wife/spouse,” “Opposite-sex unmarried partner,” “Same-sex husband/wife/spouse,” and “Same-sex unmarried partner.” Additionally, the two unmarried partner categories were moved from near the end of the list of response options to near the beginning, immediately after the Husband/wife/spouse options. An automated relationship/sex consistency check will be included in electronic instruments to provide respondents an opportunity to change their sex or relationship responses when there is an inconsistency in the reported sex of an individual and whether their relationship was reported as “Opposite-sex” or “Same-sex” husband/wife/spouse or unmarried partner. This check reduces the inconsistency in responses and improves the quality of the relationship data.

The category “Roomer or boarder” has been dropped from the relationship question.

Race and Hispanic Origin

The 2016 ACS Content Test served as an operational test of the race and ethnicity questions that were previously tested on the 2015 National Content Test (NCT). While recommendations about the race and ethnicity questions adopted for the 2020 Census and production ACS will be based on the results of the decennial tests and decisions made in consultation with OMB, the 2016 ACS Content Test provided an opportunity to test data collection modes and examine other data not available in the 2015 NCT. The 2016 ACS Content Test evaluated interviewer-administered collection modes, assessed the race and ethnicity questions against demographic and socioeconomic data, and separately compared the race and ethnicity results to data from the ancestry question. In 2020 or later, the ACS will adopt the final version of the race and Hispanic origin questions that are implemented for the 2020 Census.

2. Needs and Uses

The primary necessity 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. The 2014 ACS Content Review collected information about how ACS estimates are being used to meet current federal data needs; the following are examples of these uses:

Federal agencies frequently use ACS data as an input for a funding allocation formula. 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.¹ Both these calculations use a yearly update factor based on ACS data and earlier data (currently from the Census 2000 Long Form, though HUD is in the process of phasing this out).²

Federal agencies also fund state and local programs through block grants that are administered and evaluated at the state and local level. The data collected via the ACS are useful not only to the federal agencies in determining program requirements 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 Community Services Block Grant program uses ACS data at the county level to determine the allocation of funds from states to eligible entities, to determine guidelines used for participant

1 See 42 U.S.C. 1437b and 1437f. HUD's funding formulas are available at: http://www.huduser.org/portal/datasets/fmr/fmrover_071707R2.doc and http://www.huduser.org/portal/datasets/il/il10/IncomeLimitsBriefingMaterial_FY10.pdf. The results of these formulas are announced yearly in the Federal Register.

2 See United States Housing Act of 1937, Public Law 93-383, as amended, and 42 U.S.C. § 1437f(c)(1); 24 CFR 888.113, 24 CFR 982.401.

eligibility, and to assess the need for assistance for low-income, including elderly, low-income households.³ 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.⁴

Federal agencies find value in using ACS estimates to understand characteristics of population groups in order to make program decisions. The Federal Communications Commission uses computer and internet use estimates to assist in evaluation of the extent of access to, and adoption of, broadband.⁵ Additionally, HHS uses disability, health insurance and other estimates to measure, report, and evaluate health disparities and improvements in health equity.⁶

Some federal agencies use ACS data to estimate future needs; the ACS provides more timely data for use in estimation models that provide estimates of various concepts for small geographic areas. 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.⁷ These flow patterns are used by both the FHWA and state transportation agencies to plan and fund new road and other travel infrastructure projects. Additionally, the Department of Energy uses ACS estimates to project residential energy demand over the next 30 years, which is detailed in EIA's Annual Energy Outlook (AEO), the premier source for assessing the energy needs of the U.S. economy in a domestic and international context.

The Census Bureau continues to examine the operational issues, research the data quality, collect cost information, and make recommendations in the future for this annual data collection.

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 Guidelines⁸). Information quality is also integral to the

3 See Community Services Block Grant Act, Pub. L. No. 105-285, Sections 673 (2), 674, and 681A, and 42 U.S.C. § 9902 (2), 9903, and 9908 (b)(1)(A), (b)(11) & (c)(1)(A)(i),

4 See 7 U.S.C. 2025(d)(2) and 7 CFR 275.24(b)(3). 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 Broadband Data Improvement Act of 2008, Pub. L. No. 110-385; 47 U.S.C. § 1303(d)

6 See Patient Protection and Affordable Care Act, Pub. L. No. 111-148, §10334 and 42 U.S.C. 300kk.

7 See 23 U.S.C. 134 and 23 U.S.C. 135. See also 23 U.S.C. 303 and 23 CFR 450.316-322. See also P.L. 109-59.

8 Refer to the Census Bureau's Information Quality Guidelines at this link:

<https://www.census.gov/about/policies/quality/guidelines.html>

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 internet, CATI, and CAPI technologies for collecting data from 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. We use CAPI technologies for collecting information from GQ facilities to accurately classify the GQs by type and to generate a sample of residents at the GQs. CAPI is also used to conduct personal interviews with GQ residents. We use CATI and CAPI technologies for both the HU and GQ Reinterview operations. Additionally, by continuing to offer an internet response option in the ACS, the Census Bureau is taking further steps to comply with the e-gov initiative. Based on early implementation of an internet response option, this method also slightly improves self-response rates and creates cost savings by reducing printing and data capture costs and workloads for more costly follow-up operations.

4. Efforts to Identify Duplication

The ACS is the instrument used to collect long-form data that have traditionally been collected only during the decennial census. The content of the ACS reflects topics that are required directly or indirectly by the Congress and that the Census Bureau determines are not duplicative of another agency's data collection. 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. Moreover, many smaller Federal and non-Federal studies use a small subset of the same measures in order to benchmark those results to the ACS, which is often the most authoritative source for local area demographic, housing, and socio-economic data.

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.

5. Minimizing Burden

Previous research and data from survey administrators indicates that the ACS HU questionnaire takes an estimated 39 minutes to complete; CAPI data collection takes an estimated 27 minutes, and response via internet takes an estimated 39 minutes. The GQ facility questionnaire takes an estimated 15 minutes to complete and the ACS GQ resident questionnaire takes an estimated 25 minutes to complete. Every effort is taken to minimize the time needed for respondents or GQ contacts to answer the questions for all ACS data collection operations. We do not anticipate any changes to these burden estimates as a result of the content changes planned for the 2019 ACS.

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 collecting data every month provides the most accurate annual average of many survey items that can vary by month or season. A monthly survey also helps us stabilize workloads across the year for CAPI operations and account for seasonal changes that occur.

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 ICSP Subcommittee on the ACS reviewed the proposed 2019 ACS content changes and recommended their approval to the OMB and Census Bureau.

For the 2016 Content Test, initial versions of the new and revised questions were proposed by federal agencies participating in the OMB Interagency Committee for the ACS. The initial proposals contained a justification for each change and described any previous testing of the question wording, the expected impact of revisions to the time series and the single-year as well as five-year estimates, and the estimated net impact

on respondent burden for the proposed revision.⁹ For proposed new questions, the justification also described the need for the new data, whether federal law or regulation required the data for small areas or small population groups, if other data sources were currently available to provide the information (and why any alternate sources were insufficient), how policy needs or emerging data needs would be addressed through the new question, an explanation of why the data were needed with the geographic precision and frequency provided by the ACS, and whether other testing or production surveys had evaluated the use of the proposed questions.

The Census Bureau and the OMB, as well as the ICSP Subcommittee, reviewed these proposals for the ACS. The OMB determined which proposals moved forward into cognitive testing. After OMB approval of the proposals, topical subcommittees were formed from the OMB Interagency Committee for the ACS, which included all interested federal agencies that use the data from the impacted questions. These subcommittees further refined the specific proposed wording that was cognitively tested.

The Census Bureau contracted with Westat to conduct three rounds of cognitive testing. The results of the first two rounds of cognitive testing informed decisions on specific revisions to the proposed content for the stateside Content Test. The proposed changes identified through cognitive testing for each question topic were reviewed by the Census Bureau, the corresponding topical subcommittee, and the ICSP Subcommittee for the ACS. The OMB then provided final overall approval of the proposed wording for field testing.

A notice was published in the *Federal Register, FR Doc. 2017-26726* on December 12, 2017, inviting the public and other federal agencies to comment on our plans to submit this request. We received nine comments in response to that notice from the following:

- National Federation of Independent Businesses (NFIB)
- Scholars Strategy Network
- Nancy Lopez, PhD
- Theresa Pugh Consulting, LLC
- Dutchess County Transportation Council
- National Association of the Deaf
- The Williams Institute
- Center for American Progress (CAP)
- Jean Public

The National Federation of Independent Businesses (NFIB) comments were related to the cost to the public and the legal authority to impose the burden. There are no costs

⁹ The ACS produces both single and five-year estimates annually. Single-year estimates are produced for geographies with populations of 65,000 or more and five-year estimates are produced for all areas down to the block group level, with no population restriction.

to the respondent other than his/her time to respond to the survey. The ACS is part of the Decennial Census Program, therefore, it is governed by the same laws as the census. The current legal authority for collecting these data resides in Title 13 of the U.S.C. or the “Census Act.” The Census Act provides the Census Bureau with legal authority to conduct the decennial census and delegates broad discretionary authority to the Secretary of Commerce for determining the manner of conducting the census. This authority has been redelegated by the Secretary to the Director of the Census Bureau. Even though Congress has granted this broad discretionary authority, the questions asked in the Census and ACS are determined by what statistics are needed to implement a vast array of federal programs. Courts routinely have upheld the constitutionality of collecting census information, characterizing as unquestionable the power of Congress to require both an enumeration and the collection of statistics in the census.

Scholars Strategy Network and Nancy Lopez, PhD encouraged the Census Bureau to retain separate Race and Ethnicity questions for the 2020 Census. The Census Bureau plans to collect Race and Ethnicity information from our respondents using separate questions for the 2019 ACS.

Theresa Pugh Consulting, LLC encouraged the Census Bureau to add questions for small business owners to the Census of Businesses regarding health insurance.

The Dutchess County Transportation Council commented on the changes to the Journey to Work question. They suggested there be an option for more than one mode of transportation and also to address ride-sharing options.

The National Association of the Deaf suggested the Census Bureau capture American Sign Language as a discrete category for the Language Spoken At Home question. The ACS “Language Spoken At Home” question provides a write-in field for the respondent’s answer, any language is an acceptable answer, including American Sign Language (ASL).

The Williams Institute thanks the Census Bureau for its efforts to improve accuracy of same-sex couple data on the ACS with the revision to the relationship question and looks forward to working with the Census Bureau to expand and improve data collection on the LGBT population.

The Center for American Progress (CAP) comments supported the 2019 Health Insurance, Journey to Work, and Relationship questions changes. The comments encourage the Census Bureau to provide the ability to select multiple options for the Journey to Work question and include checkboxes for the different sources of retirement income. CAP urged the Census Bureau to conduct additional research and testing to accomplish the goal of including sexual orientation and gender identity

measures on the ACS. CAP supports providing a combined question option for respondents to select multiple races and ethnicities.

One comment was critical of data collection in general.

A notice was published in the *Federal Register*, *FR Doc. 2018-06166* on March 28, 2017, inviting the public and other federal agencies to comment on our plans to submit this request. We received six comments in response to that notice from the following:

Kathleen Call, University of Minnesota
Dennis Fixler, Chief Economist, Bureau of Economic Analysis
Human Rights Campaign
National Association of Latino Elected and Appointed Officials (NALEO) Educational Fund
Asian Americans Advancing Justice
American-Arab Anti-Discrimination Committee

The comments from the University of Minnesota, the Bureau of Economic Analysis, and the Human Rights Campaign support the 2019 ACS content changes proposed in this clearance package.

The comments from the NALEO Educational Fund and Asian Americans Advancing Justice share their concern about the need for OMB to finalize revisions to the Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity to allow the Census Bureau to utilize research findings to modify the questions for collecting race and ethnicity data on the ACS and the 2020 Census.

The comments from the American-Arab Anti-Discrimination Committee share their concern about the exclusion of the Middle Eastern or North African (MENA) category on both the 2019 ACS and 2020 Census.

Comments received are in Attachment S.

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, GQ administrator, and each person within a GQ participating in the ACS is assured of the confidentiality of their answers. A brochure is sent to sample housing units with the initial mail package

and contains this assurance. Housing units responding using the internet questionnaire are presented with additional assurances of their confidentiality and security of their online responses. The brochure mailed to sample GQs with the GQ introductory letter contains assurances of confidentiality. It is also provided to sample GQ residents at the time of interview.

Household members, GQ administrators or GQ residents 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, 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, GQ administrator, or GQ resident 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 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 those 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

The sample size is 295,000 households per month, and we plan to mail survey materials to approximately 286,000 households each month that have mailable addresses. The Census Bureau estimates that, for the average household, the new 2019 version of either the paper ACS-1 questionnaire or the internet questionnaire will continue to take approximately 40 minutes to complete, including the time for reviewing the instructions and answers. This estimate is unchanged from the estimated time to complete the 2018 household version of the paper questionnaire. We also do not estimate any increase in time to complete the Group Quarters interviews. We plan to conduct reinterviews for approximately 3,600 households each month. We estimate that the average time for a reinterview will be 10 minutes.

We plan to conduct personal interviews at 1,667 GQs each month. At each facility,

one GQ contact is interviewed to collect data about the GQ and to provide a list of residents in the GQ. This list is used to randomly select the sample of individuals to complete the ACS. The estimated time for each facility interview is 15 minutes. We conduct interviews with approximately 16,667 people in GQs each month. The estimated response time for each person to complete the ACS-1(GQ) is 25 minutes. We also conduct GQ reinterviews for approximately 166 GQs each month. We estimate that the average time for a GQ reinterview will be 10 minutes.

Please note the number of respondents is 3,760,000 but due to re-contacting respondents during our reinterview operation, the number of responses is 3,805,200. We have based these estimates of the average length of time on our previous ACS tests and on experiences with forms of comparable lengths used in previous censuses and tests. The total number of respondent burden hours for a full year is 2,455,868 hours. See Table 1 on the following page for the detailed respondent and burden hour estimates.

Table 1. Annual ACS Respondent and Burden Hour Estimates

Data Collection Operation	Forms or Instrument Used in Data Collection	Annual Estimated Number of Respondents	Estimated Minutes Per Respondent by Data Collection Activity	Annual Estimated Burden Hours
I. ACS Household Questionnaire - Paper Mailout/Mailback	ACS-1, ACS 1(SP), ACS-1PR, ACS-1PR(SP)	3,540,000	40	2,360,000
<i>ACS Household CAPI – Personal Visit Non-response Follow-up</i>	<i>CAPI HU</i>	<i>[698,000 included in I.]</i>	<i>[40]</i>	<i>[466,000 included in I.]</i>
<i>ACS Household internet</i>	<i>Internet HU</i>	<i>[712,000 included in I.]</i>	<i>[40]</i>	<i>[475,000 included in I.]</i>
II. ACS GQ Facility Questionnaire CAPI - Telephone and Personal Visit	CAPI GQFQ	20,000	15	5,000
III. ACS GQ CAPI Personal Interview or Telephone, and – Paper Self-response	CAPI, ACS-1(GQ), ACS-1(GQ) (PR)	200,000	25	83,333
IV. ACS Household Reinterview – CATI/CAPI	ACS HU-RI	43,200	10	7,200
V. ACS GQ GQ-level Reinterview – CATI/CAPI	ACS GQ-RI	2,000	10	335
TOTALS		3,805,200	N/A	2,455,868

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 2019 President’s Budget, the estimated cost of the 2019 ACS is approximately \$213.6 million. The Census Bureau will pay the total cost of the ACS.

15. Reason for Change in Burden

We do not estimate any change in burden due to the 2019 content changes.

16. Project Schedule

We will release data for the new 2019 content beginning September 2020. The data releases will include data collected from HUs and GQs.

The data collection activities for the 2019 Content will begin in late December 2018.

Approximately two months after the initial mailing for a sample month, we begin the CAPI operation for a sample of households which have not responded by mail or internet.

Each month, we begin interviews with sample GQ administrators and a sample of residents. The data collection for each GQ sample month is six-weeks. The GQ reinterview takes place approximately one month after the beginning of the survey year and continues until the end of December each year. The ACS GQ does not include a formal non-response follow up operation, but FRs contact a respondent or GQ administrator for missing responses on the questionnaire at any point during the six-week data collection period.

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.