

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 replaces 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In years past, the Census Bureau collected the long-form data only once every ten years and it became out of date over the course of the decade.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 reliable estimates. The first three-year estimates were released in 2008; the first five-year estimates in 2010. The 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, a sample of addresses is selected and survey materials are mailed each month to a new group of potential households. Most households are asked first to complete the survey through the internet, with a paper questionnaire provided to those households that do not respond by internet. The Census Bureau then selects 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, the Census Bureau samples at a rate of one in three. The ACS also conducts 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.

The ACS releases 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, the ACS produces 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, the ACS selects 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 data collection in 2013.

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.

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 is a brochure that provides basic information about the survey in English, Spanish, Russian, Simplified 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 20 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 the Census Bureau does not receive their response. This letter includes clear instructions to log in, including an explicit reference to the user identification number. A pressure-seal mailer is used 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 questionnaire, 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. A pressure-seal mailer is used 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 the Census Bureau does 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, the ACS deferred the introduction of an internet response option in order to further assess the best implementation approach. Therefore, the Census Bureau continues to use the previously used mail strategy with no references to an internet response option. The 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 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. The ACS is 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 the Census Bureau has not obtained a self-response (paper or internet). The CAPI instruments are available in English and Spanish. The ACS also conducts a CAPI-only operation to collect ACS data from sampled HUs in remote areas of Alaska.

The ACS provides 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 telephone number. For Puerto Rico households, the Census Bureau mails 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, the Census Bureau conducted a CATI Failed Edit Follow-up (FEFU) operation if the Census Bureau 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 the Census Bureau could obtain information for the additional members of the household. Starting in October 2012, the ACS scaled back the FEFU operation to focus on only households with coverage problems (such as mail respondents with more than five people, mail respondents with more people listed on the cover than in the basic demographic section, or questionnaires returned for vacant units). The Census Bureau also uses 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, the Census Bureau 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.

The ACS also collects information from HUs identified as vacant. The Census Bureau asks 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.

The ACS conducts a reinterview operation to monitor field representative performance. Only households that provide an interview through CAPI are eligible for this reinterview. For the household reinterview operation, the Census Bureau uses 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 through a centralized CATI operation. Reinterview cases are transferred to the regional offices for personal visit interviewing if they cannot be resolved through the telephone attempts. The household ACS Reinterview questions are included in Attachment L.

The 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, the ACS selects 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 may begin making contact with the GQ. The field representative 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 field representatives 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.

The ACS uses 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 questionnaire, a thank you letter, and a copy of the ACS GQ brochure. The Census Bureau conducts a separate operation to collect ACS GQ data from sampled GQs in federal prisons and in remote Alaska.

For Puerto Rico sample GQ residents, the Census Bureau uses PRCS data collection packages (Attachment Q) to collect the GQ data.

The ACS conducts a GQ reinterview (RI) operation to monitor the performance of field representatives conducting the GQFQ interviews. For the GQ RI operation, the Census Bureau uses a separate set of questions to verify and monitor the field representative interviews at the GQ level (Attachment R). Similarly to the housing unit RI operation, GQ RIs are initially conducted through a centralized telephone operation. Reinterview cases are transferred to the regional offices for personal visit interviewing if they cannot be resolved by the telephone attempts.

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

Changes to the ACS for 2020

The ACS data is one of the Department of Commerce's most valuable data products, used extensively by businesses, nongovernmental 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.

As stated in the ACS 2019 OMB Clearance Package, in 2020, the ACS will adopt the final version of the race and Hispanic origin questions that will be implemented for the 2020 Census. This change will make the ACS consistent with 2020 Census data on this topic.

The ACS will also change the instruction for reporting babies' ages to match the 2020 Census. Ongoing research suggests the instructions for reporting infant ages creates challenges for some respondents. Cognitive testing demonstrated the wording for the age instruction is unclear and confusing to some respondents; the revised instruction is expected to help respondents understand how to respond to the question for infants under age 1. Details about all of the questions planned for the 2020 Census

and the American Community Survey are available at:
<https://www.census.gov/2020questions>.

The ACS self-response rates in 2010, a decennial census year, were higher than usual in the first few months of the year, but were lower than usual in the spring and summer months, when the 2010 Census was underway. The increased self-response rates early in the year were attributed to decennial census communications while the decreased rates later in the year were attributed to respondent confusion, as respondents had already filled out their decennial census form and did not understand that the ACS was a separate data collection. Prior research suggests that during a decennial census year, ACS mail materials such as envelopes and letters should be revised to distinguish the ACS from the census. For the 2020 ACS data collection year, the Census Bureau will modify the mail package contents, field representative flyers, scripts for the Interactive Voice Recognition system, and frequently asked questions to better communicate to respondents that the ACS is a separate data collection from the 2020 Census and that respondents selected for the ACS should complete both the ACS and the 2020 Census. These materials can be found in Attachments N, P, Q, and T.

To encourage self-response in the ACS, the Census Bureau sends up to five mailings to an address selected to be in the sample. The first mailing, sent to all mailable addresses in the sample, includes an invitation to participate in the ACS online and states that a paper questionnaire will be sent in a few weeks to those unable to respond online. Subsequent mailings serve as a reminder to respond to the survey, with a paper questionnaire included in the third mailing for those households that prefer to respond by mailing back the questionnaire. Respondents who begin filling out the survey online have an option to provide an email address, which would be used to send an email reminder to households that did not complete the online form. The reminder asks them to log back in to finish responding to the survey.¹

Some addresses are deemed unmailable because the address is incomplete or directs mail only to a post office box. The Census Bureau currently collects data for these housing units using CAPI. The Census Bureau plans to make the ACS online survey available to all housing units in the 50 states and the District of Columbia, including those with unmailable addresses. Residents in housing units with unmailable addresses will still be contacted by Census Bureau field representatives, but they will now be given the option to complete the survey online or by personal interview. Because of conflicting priorities, the Census Bureau needs to reassess when implementation of this change is feasible. This change in implementation is different than what was published in the 60-day Federal Register Notice on October 16, 2018.

¹See the 2017 American Community Survey (ACS) Internet Test research paper at:
https://www.census.gov/library/working-papers/2016/acs/2016_Zelenak_01.html

As a result of the 2018 Mail Materials Test, the Census Bureau plans to implement new mail materials designed to better emphasize the benefits of survey participation. Included in the changes are the use of updated logos on the envelopes and letters to identify the mail more clearly as coming from the Census Bureau and the addition of “Open Immediately” on some of the envelopes. Additionally, bold lettering and boxes (callout boxes) are used to highlight elements of the materials to capture the attention of busy respondents who may not read the entire letter. The mandatory nature of the survey is highlighted by using bold text and isolating sentences about being mandatory in the materials. Some materials, such as the Frequently Asked Questions (FAQ) brochure are excluded from the mailings to simplify the materials and focus the attention of the respondent to what they need to do. Content from the FAQ brochure is included on the back of the letters. Please see Attachment A and Attachments C – F.

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 the 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.² 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).³

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 by the ACS are useful not only to the federal agencies in determining program requirements but also to state, local, and tribal governments in planning,

² 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.

³ 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.

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 eligibility, and to assess the need for assistance for low-income, including elderly, households.⁴ 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.⁵

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.⁶ Additionally, HHS uses disability, health insurance and other estimates to measure, report, and evaluate health disparities and improvements in health equity.⁷

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 ACS 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.⁸ 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, the premier source for assessing the energy needs of the U.S. economy in a domestic and international context.

4 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),

5 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.](#)

6 See Broadband Data Improvement Act of 2008, Pub. L. No. 110-385; 47 U.S.C. § 1303(d)

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

8 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.

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

Information quality is an integral part of the predissemination review of the information disseminated by the Census Bureau (fully described in the Census Bureau's Information Quality Guidelines).⁹ 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

The Census Bureau uses internet, CATI, and CAPI technologies for collecting data from households for the ACS. These technologies allow questions to be skipped that may be inappropriate for a person/household, which, in turn, keeps respondent burden to a minimum. The Census Bureau uses 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. The Census Bureau uses 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 vehicle used to collect long-form data that had been collected only during the decennial census. The content of the ACS reflects topics that support the legal and program requirements of federal agencies 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.

⁹ Refer to the Census Bureau's Information Quality Guidelines at this link:
<https://www.census.gov/about/policies/quality/guidelines.html>

In addition, the OMB Interagency Committee on 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 by 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. The Census Bureau does not anticipate any changes to these burden estimates as a result of the content changes planned for the 2020 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 the Census Bureau 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 OMB in conjunction with the Census Bureau established the Interagency Council on Statistical Policy (ICSP) Subcommittee 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 2020 ACS content changes and

recommended their approval to the OMB and Census Bureau.

A notice was published in the *Federal Register, FR Doc. 2018-22443, Volume 83, pages 52189-52190* on October 16, 2018, inviting the public and other federal agencies to comment on the Census Bureau's plan to submit this request. The Census Bureau received five comments in response to that notice from the following:

A comment received from the Arab American Institute urges the Census Bureau to add a Middle Eastern/North African (MENA) race category, continue asking about ancestry and work to ensure the integrity of Census Bureau data and ensure all people are counted. The Census Bureau follows the current OMB guidelines regarding race and ethnicity.

A comment received from the National Association of Latino Elected and Appointed Officials (NALEO) Educational Fund share concerns 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 Census Bureau follows the current OMB guidelines regarding race and ethnicity. NALEO also urges the Census Bureau to expand its efforts in 2020 and beyond to innovate through the vehicle of the ACS. NALEO recommends that the ACS mailed materials incorporate messaging and multilingual items to increase their effectiveness. Based on positive testing results, in 2020, the ACS plans to update the messaging on the mailed materials and have included multilingual messaging in these revisions. NALEO also recommends that the Census Bureau strives for personal contact between field representatives and ACS respondents who live in hard-to-count communities without mail delivery. In the near future, the ACS plans to make the entire ACS sample eligible for the internet option, which would include the communities without mail delivery. During the in-person interview operation, our field representatives would encourage survey participation through conducting the interview in-person with the field representative or completing the survey online using the internet option.

One comment suggested to add more people to the survey to improve the response rate and suggested to add an online response option to decrease burden on the public. The current 3.5 million sample size is the appropriate size and has been scientifically selected to produce reliable estimates. Since January 2013, the ACS has an online response option.

One comment was critical of the ACS and 2020 concurrent data collection efforts. One comment was not related to the proposed information collection.

Comments received are in Attachment S.

9. Paying Respondents

The Census Bureau does not pay ACS 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 the Census Bureau collects, 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 are necessary for the analysis of important policy and program issues and has structured the questions to lessen their sensitivity. The Census Bureau has provided guidance to the CAPI field representatives on how to ask these types of questions during the interview. The Census Bureau has materials that demonstrate how the data from these questions are used and kept 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 the Census Bureau plans 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 2020 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. The ACS also does not estimate any increase in time to complete the Group Quarters interviews. The Census Bureau plans to conduct reinterviews for approximately 3,600 households each month. The Census Bureau estimates the average time for a reinterview will be 10 minutes.

The Census Bureau plans 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. The Census Bureau conducts 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. The Census Bureau also conducts GQ reinterviews for approximately 166 GQs each month. The Census Bureau estimates the average time for a GQ reinterview will be 10 minutes.

Please note the number of respondents is 3,760,000 but because of recontacting respondents during our reinterview operation, the number of responses is 3,805,200. The Census Bureau has 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 2020 President's Budget, the estimated cost of the 2020 ACS is approximately \$213.6 million. The Census Bureau will pay the total cost of the ACS.

15. Reason for Change in Burden

The Census Bureau does not estimate any change in burden because of the 2020 content changes.

16. Project Schedule

The Census Bureau will release data for the new 2020 content beginning September 2021. The data releases will include data collected from HUs and GQs. The data collection activities for the 2020 Content will begin in late December 2019.

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

Each month, the Census Bureau begins 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 nonresponse followup operation, but field representatives 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

The Census Bureau requests to 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.