

SUPPORTING STATEMENT
U.S. Department of Commerce
U.S. Census Bureau
Generic Clearance for Questionnaire Pretesting Research
OMB Control No. 0607-0725

A. Justification

1. Necessity of Information Collection

In September 1991, the Census Bureau requested and received a generic clearance (Number 0607-0725) on an experimental basis, which relaxed some of the time constraints and enabled the Census Bureau to begin conducting extended cognitive and questionnaire design research as part of testing for its censuses and surveys. The clearance covered data collections in the demographic, economic, and decennial areas of the Bureau, and specifically applied to research that is focused on questionnaire design and procedures aimed at reducing measurement errors in surveys. As part of the experimental clearance, the Census Bureau submitted to the Office of Management and Budget (OMB) a report that contained indicators of the work that was conducted under the clearance. At the end of the experimental period, the Census Bureau requested and received a three-year renewal of the clearance (through December 1995), covering the same kinds of research activities. Later it was enlarged to include research about incentives, expanded field tests conducted to include split sample questionnaire experiments in multiple panels, and usability testing of electronic instruments. Subsequently, the Census Bureau has received eight more three-year renewals of the generic clearance for pretesting (through September 2019).

At this time, the Census Bureau is seeking another three-year renewal of the generic clearance for pretesting, with the same conditions as the previous clearance. This will enable the Census Bureau to continue providing support for pretesting activities, which is important given the length of time required to plan the activities.

The specific methods proposed for coverage by this clearance are described below. Also outlined are the procedures in place for keeping OMB informed about the nature of the research activities being conducted.

The methods proposed for use in questionnaire development are as follows:

Respondent debriefing questionnaire. In this method, standardized debriefing questionnaires are administered to respondents who have participated in an actual survey or a field test. The debriefing form is administered at the end of the questionnaire being tested, and contains questions that probe to determine how respondents interpret the questions and whether they have problems in completing the survey/questionnaire. This structured approach to debriefing enables quantitative analysis of data from a representative sample of respondents, to learn whether respondents can answer the questions, and whether they interpret them in the manner intended by the questionnaire designers.

Cognitive interviews. This method involves one-on-one interviews in which the

respondent is typically asked to "think aloud" as he or she answers survey questions. A number of different techniques may be involved, including asking respondents to paraphrase questions, probing questions asked to determine how respondents came up with their answers, and so on. The objective is to identify problems of ambiguity or misunderstanding, or other difficulties respondents may have answering questions. This is frequently the first stage of revising a questionnaire.

Usability Interviews. This method involves getting respondent input to aid in the development of automated questionnaires and websites and associated materials. A number of different techniques may be involved, such as one-on-one usability interviews with think aloud, probing, and paraphrasing tasks, card-sorting techniques, eye-tracking, and disability accommodation testing. The objective is to identify problems that keep respondents from completing automated questionnaires accurately and efficiently, with minimal burden or that prevent respondents from successfully navigating websites and finding the information they seek.

Focus groups. This method involves group sessions guided by a moderator, who follows a topical outline containing questions or topics focused on a particular issue, rather than adhering to a standardized questionnaire. Focus groups are useful for surfacing and exploring issues (e.g., confidentiality concerns) which people may feel some hesitation about discussing.

Procedures for Clearance

We will provide OMB with a copy of questionnaires, protocols, and debriefing materials in advance of any testing activity. Depending on the stage of questionnaire development, this may be the printed questionnaire from the last round of a survey or a revised draft based on analysis of other evaluation data. OMB will endeavor to provide comments on substantive issues within 10 working days of receipt.

Attachment B contains a generic screener that will be used to recruit members of the general population for cognitive and usability testing. When additional questions are needed for screening, they will be included in the individual submissions.

Any large field tests or dress rehearsals that follow from the initial questionnaire development activity included here are not covered by this generic clearance. Separate submissions for any such data collection efforts will be made.

Data collection for this project is authorized under the authorizing legislation for the questionnaire being tested. This may be Title 13, Sections 131, 141, 161, 181, 182, 193,

and 301 for Census Bureau-sponsored surveys, and Title 13 and 15 for surveys sponsored by other Federal agencies. We do not now know what other titles will be referenced, since we do not know what survey questionnaires will be pretested during the course of the clearance.

2. Needs and Uses

The information collected in this program of developing and testing questionnaires will be used by staff from the Census Bureau and sponsoring agencies to evaluate and improve the quality of the data in the surveys and censuses that are ultimately conducted. None of the data collected under this clearance will be published for its own sake.

Because the questionnaires being tested under this clearance are still in the process of development, the data that result from these collections are not considered official statistics of the Census Bureau or other Federal agencies. Data will be included in research reports prepared for sponsors inside and outside of the Census Bureau. The results may also be prepared for presentations related to survey methodology at professional meetings or publications in professional journals.

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 Guidelines). 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.

3. Use of Information Technology

When the census or survey being pretested employs automated methods for its data collection, the questionnaire research conducted under this submission will also utilize automated data collection techniques.

4. Efforts to Identify Duplication

This research does not duplicate any other questionnaire design work being done by the Census Bureau or other Federal agencies. The purpose of this clearance is to stimulate additional research, which would not be done under other circumstances due to time constraints. This research will involve collaboration with staff from other agencies who are sponsoring the surveys conducted by the Census Bureau. The research may also involve joint efforts with staff from other Federal laboratory facilities. All efforts would

be collaborative in nature, and no duplication in this area is anticipated.

To the maximum extent possible, we will make use of previous information, reviewing results of previous evaluations of survey data before we attempt to revise questionnaires. However, this information is not sufficient to refine our census and survey questionnaires without conducting additional research.

5. Minimizing Burden

This research will be designed as relatively small-scale data collection efforts. This will minimize the amount of burden required to improve questionnaires and procedures, test new ideas, and refine or improve upon positive or unclear results from other tests.

6. Consequences of Less Frequent Collection

This clearance involves one-time questionnaire development activities for each survey that is connected with the clearance. If this project were not carried out, the quality of the data collected in the surveys would suffer.

7. Special Circumstances

All the guidelines listed in the OMB guidelines are met. There are no special circumstances.

8. Consultations Outside the Agency

Consultation with staff from other Federal agencies that sponsor surveys conducted by the Census Bureau will occur in conjunction with the testing program for the individual survey. Consultation with staff from other Federal laboratory facilities may also occur as part of joint research efforts. These consultations will include discussions concerning potential response problems, clarity of questions and instructions, and other aspects of respondent burden. Additional efforts to consult with potential respondents to obtain their views on the availability of data, clarity of instructions, etc., may be undertaken as part of the testing that is conducted under this clearance.

A notice was published in the Federal Register on May 15, 2019, Vol. 84, Document Number 2019-10021, Pages 21750-21751, inviting public comment on our plans to submit this request. We have not received any response to this notice.

9. Paying Respondents

Respondents for activities conducted in the laboratory (that is, cognitive interviews, usability interviews and focus groups) under this clearance will receive a small stipend. This practice has proven necessary and effective in recruiting subjects to participate in this small-scale research, and is also employed by the other Federal cognitive laboratories. The incentive for participation in a cognitive or usability interview is \$40 for an interview under 90 minutes and \$60 for an interview lasting more than 90 minutes, and for participation in a focus group it is \$75 unless approval for a higher amount is granted by OMB on a case-by-case basis.

10. Assurance of Confidentiality

All respondents who participate in research under this clearance will be informed that the information they provide is confidential and that their participation is voluntary. For personal visit and telephone interviews, this information will be conveyed verbally by the interviewer. For personal visit interviews, respondents will also be notified in writing so they will have something they can keep and read. For self-administered questionnaires, the information will be included in the mailing package, on either the questionnaire or the instructions. All participants in cognitive research will be required to sign written notification concerning the voluntary and confidential nature of their participation. We will also inform respondents in writing of the need to have an OMB number. Copies of the five generic clearance consent form templates are contained in Attachment A. They include a consent form for conducting demographic pretesting with adults, parental consent form for conducting demographic pretesting with minors, consent form for conducting usability interviews with adults, a parental consent form for conducting usability interviews with minors, and a consent form for economic survey pretesting..

The confidentiality of information is assured by Title 13, United States Code, or other applicable titles that authorize the collection of information.

11. Justification for Sensitive Questions

Most of the questions that are included on Census Bureau questionnaires are not of a sensitive nature and should not pose a problem to respondents. However, it is possible that some potentially sensitive questions may be included in questionnaires that are tested under this clearance. One of the purposes of the testing is to identify such questions, determine sources of sensitivity, and alleviate them insofar as possible before the actual survey is administered.

12. Estimate of Hour Burden

The total estimated respondent burden is 16,500 hours for the period from September 2016 through August 2019. These hours will be distributed as follows:

Timeline	Respondent burden hours
September 2016 - August 2017	5,500 hours
September 2017 - August 2018	5,500 hours
<u>September 2018 - August 2019</u>	<u>5,500 hours</u>
Total	16,500 hours

This estimate is based on our experience with this clearance over history of this clearance, and our anticipated use of the clearance over the next three years, including burden hours expended for multi-panel questionnaire experiments.

A variety of forms will be used in conducting the research under this clearance, and the exact number of different forms, length of each form, and number of subjects/respondents per form are unknown at this time.

13. Estimate of Cost Burden

There is no cost to respondents for participating in the research being conducted under this clearance, except for their time to complete the questionnaire.

14. Cost to Federal Government

There is no way to anticipate the actual number of participants, length of interview, and/or mode of data collection for the surveys to be conducted under this clearance. Thus, it is impossible to estimate in advance the cost to the Federal Government. Costs will be covered by divisions conducting the research from their data collection budgets.

15. Reason for Change in Burden

There are no changes in burden. The current annual allotment is 5,500 hours.

16. Project Schedule

This research program is for questionnaire and procedure development purposes. Data tabulations will be used to evaluate the results of questionnaire testing. The information collected in this effort will not be the subject of any printed Census Bureau reports; however, it might be included as a methodological appendix or footnote in a report containing data from a larger data collection effort. The results of this research may be prepared for presentation at professional meetings or publication in professional journals.

Due to the nature of this clearance, there is no definite or tentative time schedule at this point. We expect work to continue more or less continuously throughout the duration of the clearance.

17. Request to Not Display Expiration Date

No exemption is requested.

18. Exceptions to the Certification

There are no exceptions to the certification.