OMB Information Collection Request Supporting Statement A U.S. Department of Commerce U.S. Census Bureau Voting and Registration Supplement OMB Control Number 0607-0466

A. JUSTIFICATION

1. <u>Circumstances Making the Collection of Information Necessary</u>

The U.S. Census Bureau requests authorization from the Office of Management and Budget (OMB) to conduct the Voting and Registration supplement to the Current Population Survey (CPS). The Voting and Registration supplement continues the biennial collection of data concerning voting and registration that has been asked periodically since 1964. The supplement is sponsored by the U.S. Census Bureau, and is conducted in conjunction with the November CPS. The proposed questions are shown in Attachment A.

Title 13 United States Code, Sections 8(b), 141, and 182; and Title 29, United States Code, Section 2 authorize the collection of most of the information in the CPS. The CPS advance letter presently in use (Attachment B) is generic for all CPS collections, and cites the legal authorities stated above.

2. <u>Purpose and Use of Information Collection</u>

1The primary purpose of collecting the voting data from the November CPS supplement is to relate demographic characteristics (age, sex, race, education, occupation, and income) to voting and nonvoting behavior. Federal, state, and local election officials; college institutions; political party committees; research groups; and other private organizations will use the voting and registration data collected in the November CPS supplement. Election officials use these data to formulate policies relating to the voting and registration process. Data obtained on duration of residence will allow policymakers and researchers to better determine the relationships between other demographic characteristics and voting behavior. Previous studies have shown that the voting and registration characteristics of recent movers differ greatly from those of nonmovers. By collecting and presenting data at the state level, we will also obtain information on the effectiveness of increased voter registration drives in different regions.

Discontinuance of the Voting and Registration supplement would disrupt a data series that has been in existence for the past 55 years. Since 1964, these data have provided statistical information for tracking historical trends of voter and nonvoter characteristics in each presidential and congressional election.

Information quality is an integral part of the pre-dissemination review of information

disseminated by the Census Bureau (fully described in the Census Bureau's Information Quality Guidelines). Information quality is also integral to 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

We deem the use of personal visits and telephone interviews, using computer-assisted telephone interviewing and computer-assisted personal interviewing, the most appropriate collection methodology given existing available information technology. We are examining the Internet as a reporting option, but have not yet determined whether the Internet is feasible for a complex demographic survey such as the CPS.

4. Efforts to Identify Duplication

The Voting and Registration supplement's comprehensive set of questions does not duplicate any other single information collection with respect to scope, timeliness, or population of interest. There are no comparable data that can be replicated, substituted, or modified for use as described in section A2 above.

5. Minimizing Burden

The collection of voting and registration information does not involve small businesses or other small entities.

We designed the supplemental questions to obtain the required information with minimal respondent burden. Further, there are no legal issues that influence respondent burden.

6. <u>Consequences of Less Frequent Collection</u>

1We must collect voting and registration data at the time of presidential and congressional elections, which are conducted biennially. These are the only elections that are held on the same date throughout the country. Less frequent collection would reduce the ability to track changes over time and lessen the quality of the voting data time series.

7. <u>Consistency with Office of Management and Budget (OMB) Guidelines</u>

The data will be collected in a manner consistent with the OMB guidelines.

8. <u>Consultations Outside the Agency/Comments in Response to the Federal Register</u>

The Census Bureau published a notice of our intent to ask the voting and registration questions in the March 13, 2020, edition of the Federal Register (see 85 FR 14632, pages 14632-14633). We received one comment in response to the notice, giving support for the collection of the information, and offering recommendations for improvement to the sample and to certain questions.

The Census Bureau published another notice of our intent to ask the voting and registration questions in the June 3, 2020, edition of the Federal Register (see 85 FR 34177, page 34177). We received a comment in response to the notice, from which the NALEO Education Fund made several recommendations regarding the survey. Responses to the recommendations are provided in an attachment to this request (Response to Public Comment to the Federal Register). As stated in the attachment, the Census Bureau proposes to make the following changes to the 2020 Voting and Registration questionnaire due to the COVID pandemic:

- a) Add a response choice to question S3 about respondents' reasons for not registering to vote that reference the COVID-19 pandemic.
- b) Add a response choice to question S4 about respondents' reasons for not voting that reference the COVID-19 pandemic.

The Census Bureau conducted an expert review of the proposed changes, and discussions between research staff and subject matter staff resulted in the final list of response choices for S3 and S4.

The following people have been in frequent consultation concerning the development of this supplement:

Royce Crocker Election Research Center Congressional Research Service Washington, DC 20450 (202) 707-7871

Kim Brace Election Data Services 1225 I Street, NW Suite 700 Washington, DC 20005 (202) 789-2004

The result of these consultations is the final set of questions. In addition, a statement soliciting comments for improving the CPS data is prominently placed in all the Census Bureau publications that cite the CPS data.

We include a similar statement in the technical documentation that accompanies the microdata files. Finally, the CPS advance letter (see attachment B) provides respondents with an address at the Census Bureau to which they can submit general comments on the survey and specifically those comments regarding respondent burden.

9. Paying Respondents

The Census Bureau does not make any payments or provide any gifts to individuals participating in the CPS and its monthly supplements.

10. Assurance of Confidentiality

The Census Bureau will comply with the Privacy Act of 1974 and the OMB Circular A-130 requirement in terms of notification to the respondent. Each sample household receives an advance letter approximately one week before the start of the CPS initial interview (see Attachment B). The letter includes the information required by the Privacy Act of 1974, explains the voluntary nature of the survey, and states the estimated time required for participating in the survey. Interviewers must ask if the respondent received the letter and, if not, provide a copy and allow the respondent sufficient time to read the contents. Also, interviewers provide households with the pamphlet, *The U.S. Census Bureau Respects Your Privacy and Protects Your Personal Information*, which further states the confidentiality assurances associated with this data collection effort and the Census Bureau's past performance in assuring confidentiality (see Attachment C).

All information given by respondents to Census Bureau employees is held in strict confidence under Title 13, United States Code, Section 9. Each Census Bureau employee has taken an oath to protect the confidentiality of respondents' data and is subject to a jail penalty and/or substantial fine if he or she discloses any information given to him or her.

11. Justification for Sensitive Questions

The Voting and Registration supplement does not include any questions of a sensitive nature.

12. Estimate of Hour Burden

The estimated respondent burden is 1,300 hours. Due to age and citizenship requirements for the voting questions, approximately 52,000 households are actually interviewed for the supplement. With each household interview, on average, being one and a half minutes long, this amounts to an hour burden of 1,300 hours for these

questions.

The estimated total annual respondent cost burden based on these hours is \$34,762. For individuals, the wage rate is \$26.74 per hour based on hourly earnings for employees as reported by the Bureau of Labor Statistics.

13. Other Costs to Respondents

There are no costs to the respondents other than that of their time to respond.

14. <u>Cost to Federal Government</u>

The estimated cost of the Voting and Registration supplement, borne by the U.S. Census Bureau, is \$275,000. This cost includes development of the computer instrument, procedures, and training. This also include the time spent for data collection and all editing and weighting of the data in post processing.

15. <u>Reason for Change in Burden</u>

The burden represents an increase of 1,300 hours in respondent burden. The reason for the change in burden is due to this request being a reinstatement of a previously approved collection for which approval has expired.

16. <u>Project Schedule</u>

We will conduct the CPS, of which this supplement is a part, during the week of November 15-21, 2020. Processing of this supplement will commence in December 2020. The public use file will be released approximately twelve months later, with voting and registration tabulations released by the U.S. Census Bureau.

17. <u>Request to Not Display Expiration Date</u>

The Voting and Registration supplement is administered as part of the CPS monthly interview in November every two years. However, the supplement (as well as all the CPS supplements) bears an OMB control number and expiration date different from the basic CPS interview. The OMB control number for the CPS basic interview is included in the advance letter we give respondents (see Attachment B). Because of these complexities and the anticipated respondent confusion involved with expressing a separate control number and expiration date to respondents for the supplement questions, we request a waiver of the requirement to display the OMB control number and expiration date for the CPS Voting and Registration supplement.

18. Exceptions to the Certification

There are no exceptions to the certification.