

SUPPORTING STATEMENT – PART A

Overseas Citizen Population Survey: 0704-0539

Summary of Changes:

This is a revision of a previously approved collection. The questions have changed from the previous iteration, though care has been taken to ensure that estimated time to complete is the same. Sample size has stayed the same. However, the Supporting Statement for the 2020 OCPS will have higher burden costs than the 2018 OCPS due to change in the hourly rate.

A. JUSTIFICATION

1. Need for the Information Collection

Legal Authorities. The President of the United States designated the Secretary of Defense to administer the Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA) As Modified by the Military and Overseas Voting Empowerment Act, 52 USC 20301¹. UOCAVA is the principal enabling statute that grants authority for the Department of Defense (DoD) to facilitate absentee voting amongst members of the Uniformed Services and Merchant Marine, their eligible family members, and all citizens residing outside the United States (U.S.) who are absent from the United States. UOCAVA requires a statistical assessment on the voter registration and participation rates for both members of the Uniformed Services and overseas civilians. The 1988 Executive Order (EO) 12642 names the Secretary of Defense as the “Presidential designee” for administering UOCAVA. In the Department of Defense Instruction (DODI) 1000.04, Federal Voting Assistance Program (FVAP), the Secretary of Defense delegated UOCAVA-related responsibilities first to the Undersecretary of Defense for Personnel and Readiness (USD[P&R]), and then, in turn, to the Director of the Federal Voting Assistance Program (FVAP). DoDI 1000.04 also updates the policy and responsibilities for FVAP under EO 12642.

Primary Objectives. The primary objective of the Overseas Citizen Population Survey (OCPS), conducted on behalf of FVAP, is to refine FVAP’s methodology for estimating the number of overseas U.S. civilians who are eligible to vote and who have registered and participated in the past. These estimates are then used to address the question of whether the registration and voting propensity of the overseas civilian population differs from that of comparable domestic or military populations. Subsequent to each Presidential election year, FVAP must report to Congress voter registration and participation rates for Uniformed Services voters and overseas citizens. Previous attempts to collect information on the overseas citizen population to identify and measure its voter registration and participation rates in Federal elections suffered from significant bias; this effort is focused on refining a well-established method to report voter registration and participation rates from a more well-defined subgroup of overseas civilians. Conducting this research will help FVAP meet its federal and congressional mandates in terms of reporting annually on its activities and overall voter registration and participation rates after each Presidential election. The data obtained through this study is also intended to provide insights into existing barriers to UOCAVA voting and recommendations for addressing these challenges. In 2018, data from the 2016 survey was used to identify the barriers that overseas citizens face in requesting, casting and returning their ballots – and, along with the 2018 data, which is just becoming available, will help shape FVAP’s outreach to these voters in 2020 and beyond. The 2020 version of the OCPS will test awareness and efficacy of these efforts. The survey also identified that overseas voters are more likely to avail themselves of electronic options when requesting their ballots (compared to active duty military, who rely more often on postal mail). These results guided changes to the 2020 survey, which further probes this difference. Finally, the 2018 survey allows for a midterm-to-midterm comparison of the overseas

¹ Previously found in 42 USC 1973ff

voting experience from 2014 to 2018 – and the 2020 version will permit a similar comparison to the 2016 presidential election.

To obtain the necessary information, the OCPS will use data collected from a sample of registered overseas civilian voters in conjunction with previous country level estimates developed by FVAP research and establish a research method to assist FVAP in reporting voter registration and participation rates for the 2020 election.

2. Use of the Information

The sponsor of this research is FVAP. The primary user of the data/results will be FVAP. Additional potential users of the results could include the Office of the Secretary of Defense (OSD), other DoD senior staff and administrators, and the Office of People Analytics (OPA).

FVAP issued a Request for Quote for research and analysis services to examine the demographic profile of registered overseas civilian voters, quantify the population of these voters by country, and calculate a voter registration and participation rate for the population using records from state and local election officials. To draw useful comparisons between eligible U.S. overseas citizens and similar domestic citizen voting age population (CVAP) or active-duty military (ADM) members, it is necessary to: (1) obtain estimates of the registration and voting rates of the overseas citizen population; (2) identify the demographic composition of the larger overseas citizen population; and (3) compare voting among overseas citizens to domestic civilians or ADM with similar characteristics. Demographic and economic information, such as age, relevant to voting behavior for domestic civilians is available from the Voting and Registration Supplement of the Current Population Survey (CPS) administered by the U.S. Census, and the FVAP Post-Election Voting Survey of the ADM (PEVS-ADM) provides similar data for the ADM population. However, much less data on these characteristics is available on the overseas citizen population. This project will use modeling methods to estimate some of these key demographic variables (e.g., gender, age) in the overseas U.S. civilian population. This will allow for a comparison of the voting behavior of eligible voters in the overseas citizen population with domestic CVAP and ADM populations who share similar characteristics.

It is expected that these estimates, although critical in describing eligible voters, are likely to be associated with considerable uncertainty given the limited data available from which to create these estimates. Therefore, to supplement this modeling work, FVAP is refining its well-established and ongoing research method for creating comparisons of voting rates across a subpopulation of critical interest. Specifically, this approach will include a survey of the overseas U.S. citizen registered voter population who requested a ballot in 2020, focused on voting-relevant characteristics such as educational attainment, income, and mobility. This data will allow FVAP to compare with greater certainty the voting behaviors of overseas registered U.S. citizens to those of the registered CVAP and ADM population who share similar characteristics.

Respondents are drawn from the population of individuals who have a record of having requested an absentee ballot as well as an address in their absentee ballot request or registration record that indicates they live outside the United States. Sampled individuals are mailed or emailed an invitation to take the survey which contains a URL for the online survey instrument. Respondents complete and return this survey electronically.

Conducting such a survey of registered absentee voter citizens living overseas at the time of the 2020 General Election will allow for the collection of specific, accurate information on the demographic variables (such as age, gender, race/ethnicity, education, and mobility) necessary to make the comparisons between the overseas, domestic, and ADM populations that are so important to FVAP's mission. Obtaining demographic variables through a survey, rather than through an estimation plan, also provides the added value of providing an opportunity to collect additional data on voting related behaviors that might help address complex and/or unexpected findings within and across countries. The survey will include questions grouped into five main categories:

- Where respondents are located
- Respondents' recent voting history

- Respondents' use of voting assistance resources
- Respondents' engagement in 2020 and their social connections
- Demographic questions

The survey instrument has been designed to parallel FVAP's Post-Election Voting Survey of the Active Duty Military, as well as the Current Population Survey, facilitating FVAP's ability to compare the registration and voting behavior of the overseas citizen population, domestic CVAP, and ADM.

The survey will be processed by a team of trained contractor operations staff who regularly handle large scale surveys. During the fielding period, respondent data will be stored on secure proprietary software, Decipher, until the fielding period ends. The operations staff will then review the final data, clean open-end data to suppress any personally identifiable information (PII), and process the final dataset.

Before the 2014 OCPS, past efforts to conduct surveys of the overseas citizen population have struggled with administration and response rate issues. However, past efforts attempted to reach the entire eligible overseas civilian population—while this might have been the population of interest, no frame exists for this population and conducting a survey without contact information for respondents can be extremely challenging. This survey will focus not on the “unframed” total population, but on the population of registered voters requesting overseas absentee ballots. This frame will be obtained from data in State voter files. The sampling frame will be constructed from a nationwide list of all voters who are registered at an overseas address and requested an absentee ballot be sent to an overseas address for the 2020 General Election.

The strength of this approach is that the frame is based on information from voter files. Because these are the files that States use to communicate with voters and send balloting materials, every single individual in the files has a mailing address that has been updated within the last few years (accounting for variation in State policies on updating and purging voter files). Using this relatively recent contact information increases the likelihood that the survey will be able to reach a representative sample of registered overseas ballot requesters and provide data necessary to make the comparisons between overseas and domestic registered voters.

3. Use of Information Technology

The OCPS will be conducted using a web only survey and “push-to-web” communications methodology, to maximize the possible use of technology while not excluding respondents without email addresses. The frame of registered voters from which the sample for the survey will be drawn will not contain email address for all users, but will include a mailing address where the individuals can be sent ballot materials. All sampled respondents will be mailed a letter invitation containing a web link and directing them to respond to the survey online. Sampled respondents for whom an email address is available will be sent an email invitation in addition to the mailed letter. Individuals who complete the online survey will not be asked for any additional paperwork or mailed any additional materials, and will benefit from the ease and efficiency of using an online survey interface. Consequently, 100% of respondents will provide data electronically. Later in the survey fielding, those respondents that have not yet completed the online survey will be sent mail and email reminders. The communications methodology will be the same as the 2018 OCPS.

4. Non-Duplication

This project is unique in its methodology and areas of inquiry. There is no other federal agency tasked with collecting information specific to the populations covered by UOCAVA and, to date, no survey using this methodology has been conducted to collect data from registered voters living overseas.

A thorough review of the existing literature and data surrounding the UOCAVA voting process reveals that no research exists that is comparable to what is proposed in this project. In reviewing the existing body of research, it appears there is a dearth of research on UOCAVA voters, especially specific sub-types like civilian voters and members of military families. In the past, federal agencies including FVAP and the U.S. Census Bureau have attempted to survey overseas citizens. However,

the logistical and methodological problems inherent in such a task made these efforts unfeasible. A 2004 GAO report describes the difficulties the Census Bureau faced when attempting to reach overseas citizens in a pilot test (Overseas Enumeration Test Raises Need for Clear Policy Direction GAO-04-470), and FVAP's 2008 Post Election Survey Report described an effort to survey overseas citizens using the Department of State's voluntary "Warden Lists." Due to issues with the coverage and access to these lists, although FVAP attempted to sample over 10,000 American citizens living overseas, only 577 complete responses were returned. This effort's use of addresses from state voter files is a new way to access a subset of overseas citizens and may allow for an improved federal government collection of data from a population that has been studied very little.

5. Burden on Small Business

The participants in this quantitative research for this data collection will be civilian UOCAVA voters. No data collection is being conducted with other businesses or establishments.

6. Less Frequent Collection

The proposed survey is a biennial activity to refine a research method to report voter registration and participation rates of overseas civilians for the 2020 General Election. If it is successful, this research may serve as a template for similar future data collections, which will be subject to their own approval processes. Conducting this research is necessary to help FVAP meet its federal and congressional mandates in terms of reporting annually on its activities and on overall voter registration and participation rates after each Presidential election. Risks involved with a denial or limitation of this information collection process include not only impeding FVAP's ability to fulfill these mandates to report to Congress, but also impacting FVAP's ability to use data on the locations and voting activities of overseas civilians to identify barriers to voting unique to this population. The insights gained from this research will ultimately be used by FVAP's work to overcome voting obstacles and improve voting success rates among non-military UOCAVA voters by adjusting its internal programs and policies.

7. Paperwork Reduction Act Guidelines

There are no special circumstances. This collection will be conducted in a manner consistent with guidelines contained in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Wednesday, April 29, 2020. The 60-Day FRN citation is 85 FR 23813. No relevant public comments were received.

A 30-Day FRN for the collection published on Tuesday, July 14, 2020.

Part B: CONSULTATION

This is a biennial information collection. Consultations occurred based on the 2014, 2016, and 2018 OCPS, past survey data from FVAP to scope this current effort, and a review of external literature related to survey methodology and UOCAVA voting and application of best practices in the preparation and conduct of this information collection.

The 2014, 2016, and 2018 surveys produced information about overseas citizen voters, the overall turnout rate among absentee ballot requesters, and the challenges and barriers they faced. The 2020 survey will repeat the sampling methodology used in 2018, and will use a modified version of the survey instrument from the 2018 survey. This survey split complex questions on voting behaviors into several shorter, simplified questions. This strategy has multiple benefits including reducing burden on the respondent, decreasing "don't know" responses and non-response, and expanding explanatory power for FVAP. Additionally, these questions provide a clearer understanding of where obstacles occurred within the absentee voting process and by what mode specifically these obstacles occurred by.

9. Gifts or Payment

There are no gifts or payments that respondents will receive during this current effort. Previous efforts conducted during the pilot test of the 2014 OCPS determined that there was not a significantly positive effect of including an incentive in the survey invitation for this population.

10. Confidentiality

The information collection does not ask respondents to submit proprietary or trade secret information to the DoD. It will not collect or use any PII as part of a qualifying information system and is not retrieved by personal identifier. Therefore, the information collected is not subject to the Privacy Act of 1974, as amended (5 U.S.C. § 552a), and neither a Privacy Impact Assessment (PIA) nor System of Records Notice (SORN) is applicable.

Respondents will be told that their responses will be treated as confidential and identifying information will not be collected in the survey or delivered to FVAP. Furthermore, findings will be reported in the aggregate and specific characteristics will not be attributed to individual participants. Identifying information such as participants' names, addresses, email addresses, or phone numbers will not be used in association with the data used in reporting.

Records Retention and Disposition Schedule: Survey records and data created for and associated with this study will be cut off when superseded or obsolete; they will be destroyed three years after cut off (102-07).

11. Sensitive Questions

The data collection instruments contain no questions of a sensitive nature. The questions asked in the survey will be non-intrusive and will not explore any areas related to sensitive subjects, such as sexual behavior or attitudes, religious beliefs, or other matters that are commonly considered private. While the subject matter involves the processes and behaviors surrounding voting, the survey will not include questions about respondents' political attitudes, their vote selections, or any other voting-related topics that could be considered controversial or private. Social Security Numbers (SSNs) will not be collected. Subjects are asked about their race and ethnicity due to the correlation between these variables and voting in the domestic population and the potential correlation with UOCAVA-specific obstacles to voting with race/ethnicity. Respondents will be informed that their participation is voluntary and that their responses will be kept confidential. Responses will be reported in the aggregate, answers will not be attributed to individuals, and participants will not be identified in reports by name or by any other identifying information.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

Burden rates are calculated based on projected Not-to-Exceed figures for the respondents to complete the online survey, based on the upper bound of the expected percentage of sample members who will respond to the survey. The expected response rate is an approximation taken from the IRS' survey of international tax filers and the 2014 and 2016 OCPS.²

1. OCPS

- a. Number of Respondents: 18,000
- b. Number of Responses per Respondent: 1
- c. Number of Total Annual Responses: 18,000
- d. Response Time: 15 minutes
- e. Respondent Burden Hours: 4,500 hours

2. **Total Submission Burden**

- a. Total Number of Respondents: 18,000
- b. Total Number of Annual Responses: 18,000
- c. Total Respondent Burden Hours: 4,500 hours

² Tiffanie N. Reker, David C. Cico, and Saima S. Mehmood, "Taxpayer Experience of Individuals Living Abroad: Service Awareness, Use, Preferences, and Filing Behaviors", <http://www.irs.gov/pub/irs-soi/12rescontaxpayexperience.pdf>

b. Labor Cost of Respondent Burden

Since this is a biennial information collection all costs referenced below reflect the appropriate annual assessment of costs. Costs are based on estimated wages for civilians and local election officials.

1. OCPS

- a. Number of Total Annual Responses: 18,000
- b. Response Time: 15 minutes
- c. Respondent Hourly Wage: \$28.52³
- d. Labor Burden per Response: \$7.13
- e. Total Labor Burden: \$128,340

2. Overall Labor Burden

- a. Total Number of Annual Responses: 18,000
- b. Total Labor Burden: \$128,340

13. Respondent Costs Other Than Burden Hour Costs

- a. There are no capital/startup costs.
- b. There are no operation and maintenance costs. No outside resources, consultations, or record retrieval are required to participate in either the ethnographies or individual interviews.

14. Cost to the Federal Government

Since this is a biennial information collection, all costs referenced below reflect the appropriate annual assessment of costs. Estimates are based on costs incurred with managing this contract, coordinating authorization for this collection and monitoring contractor activities.

1. OCPS – Supervisor

- a. Number of Total Annual Responses: 18,000
- b. Processing Time per Response: 0.004722 hours
- c. Hourly Wage of Worker(s) Processing Responses: \$64.59
- d. Cost to Process Each Response (*P: B multiplied by C*): \$0.30
- e. Total Cost to Process Responses (*P: A multiplied by D*): \$5489.89

2. OCPS – Researcher

- a. Number of Total Annual Responses: 18,000
- b. Processing Time per Response: 0.001388 hours
- c. Hourly Wage of Worker(s) Processing Responses: \$34.51
- d. Cost to Process Each Response (*P: B multiplied by C*): \$0.05
- e. Total Cost to Process Responses (*P: A multiplied by D*): \$862.20

3. Overall Labor Burden to Federal Government

- a. Total Number of Annual Responses: 18,000
- b. Total Labor Burden (*P: add all “e’s” in this section*):\$ 6352.09

15. Operational and Maintenance Costs

- a. Equipment: \$0
- b. Printing: \$20,000
- c. Postage: \$120,000
- d. Software Purchases: \$0
- e. Licensing Costs: \$0
- f. Other: \$330,000 (Contractor Labor)
- g. Total: \$470,000 (ODE)

³ Average February 2020 hourly wage from Bureau of Labor Statistics updated on March 6, 2020, available at: <http://www.bls.gov/news.release/empstat.t19.htm>

1. Total Operational and Maintenance Costs: \$470,000
2. Total Labor Cost to the Federal Government: \$6352.09
3. Total Cost to the Federal Government: \$47,6352.09

16. Reasons for Change in Burden

This is a revision of a previously approved collection. The questions have changed from the previous iteration, though care has been taken to ensure that estimated time to complete is the same. Sample size has stayed the same. However, the Supporting Statement for the 2020 OCPS will have higher burden costs than the 2018 OCPS due to change in the hourly rate.

17. Publication of Results

The duration of collection period is 01/15/2021 through 4/16/2021. Fors Marsh Group, LLC will present the research findings to FVAP and any other agencies or individuals at FVAP's direction. FVAP plans to release this research through its website and in its annual report to Congress.

18. Non-Display of OMB Expiration Date

This approval is not being requested.

19. Exceptions to "Certification for Paperwork Reduction Submissions"

No exceptions to the Certificate Statement are being requested.