

SUPPORTING STATEMENT A
U.S. Department of Commerce
U.S. Census Bureau
American Community Survey Methods Panel Tests
OMB Control No. 0607-0936

Abstract

The American Community Survey (ACS) is an ongoing monthly survey that collects detailed housing and socioeconomic data from about 3.5 million addresses in the United States and about 36,000 addresses in Puerto Rico each year. The ACS also collects detailed socioeconomic data from about 195,000 residents living in group quarters (GQ) facilities in the United States and Puerto Rico. Resulting tabulations from this data collection are provided on a yearly basis. The ACS allows the Census Bureau to provide timely and relevant housing and socioeconomic statistics, even for low levels of geography.

An ongoing data collection effort with an annual sample of this magnitude requires that the ACS continue research, testing, and evaluations aimed at improving data quality, reducing data collection costs, and improving the ACS questionnaire content and related data collection materials. The ACS Methods Panel is a research program designed to address and respond to survey issues and needs. As part of the Decennial Census Program, the ACS also provides an opportunity to research and test elements of survey data collection that relate to the decennial census. As such, the ACS Methods Panel can serve as a testbed for the decennial census. From 2021 to 2024, the ACS Methods Panel may test ACS and decennial census methods for reducing survey cost, addressing respondent burden, and improving survey response, data quality, and survey efficiencies. Testing may also include revising content or testing new questions. The ACS Methods Panel may also address other emerging needs of the programs.

Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

In 2014, the U.S. Census Bureau conducted a comprehensive content review process to ensure that only the information needed is requested, and that the justifications provided by federal agencies for the ACS questions are current and valid. Following the review of more than 300 federal agency uses of ACS data, two questions were removed and the remaining questions were validated. Any proposals of new content are reviewed for legal mandate. The content review culminated with a document that summarizes the ACS questions (as of 2014), provides examples of federal and other uses, lists federal agencies that use the data, and describes how the data are used (including references to specific legislative acts and laws). This document, the ACS Handbook of Questions and Current Federal Uses (2014), can be found here:

<https://www.census.gov/programs-surveys/acs/operations-and-administration/2014-content-review/federal-uses.html>

Similar information can also be found in the *Planned Questions for the 2020 Census and American Community Survey* (2018) and online in the “Why we Ask” website.

<https://www.census.gov/library/publications/2018/dec/planned-questions-2020-acs.html>

<https://www.census.gov/acs/www/about/why-we-ask-each-question/index.php>

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The ACS collects detailed socioeconomic data which are documented here:

<https://www.census.gov/library/publications/2018/dec/planned-questions-2020-acs.html>

Information is requested from a resident of the sampled household. For in-person interviews, respondents must be at least 15 years old. Respondents are invited to complete the survey online, by paper questionnaire, telephone, or in person. The Census Bureau selects a random sample of addresses to be included in the ACS. Each address has about a 1-in-480 chance of being selected in a month, and no address should be selected more than once every 5 years. A detailed discussion of the ACS data collection practices can be found in Part B of this supporting statement.

The ACS has been conducted since 2005. The questions asked and how the data are collected have changed over time to reflect the changing needs of our nation, as well as changes to data collection technology and respondent needs. For example, ACS questions undergo a periodic review and testing of updated constructs and wording to reflect societal and technological changes. The ACS Content Test conducted in 2016 resulted in refreshed ACS content. Working through the Office of Management and Budget (OMB) Interagency Committee for the ACS, the Census Bureau has again solicited proposals from other federal agencies to change existing questions, which are currently undergoing cognitive testing.

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. Individual responses are protected by Title 13 and can only be shared with people with sworn status. Summary information is available to the public, including other Federal Agencies, after applying disclosure avoidance techniques to protect privacy of respondents.

See <https://www.census.gov/about/policies/quality/guidelines.html> for more information about the Census Bureau’s Information Quality Guidelines.

3. Describe whether, and to what extent, the collection of information involves the use of

automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

Since 2013, the ACS has offered an internet response option to respondents in sampled housing units. The addition of the internet as a response option came about after extensive research by the Census Bureau. Results of this research are available online: <https://www.census.gov/programs-surveys/acs/library/publications-and-working-papers/internet-data-collection.2012.html>. Paper questionnaires are still available to respondents who need or prefer to use paper.

The Census Bureau is pursuing the use of an internet response option for certain types of group quarters, such as college dorms.

Computer-assisted interviewing has been used since the ACS began for personal visit and telephone interviews, for both housing unit and group quarters interviews. Computer-assisted instruments allow for the automation of skip patterns and conduct error checks on-the-spot to minimize costly follow-up interviews or editing.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.

The ACS is the instrument used to collect long-form data that have traditionally been collected only during the decennial census. The content of the ACS reflects topics that are required directly or indirectly by the Congress and that the Census Bureau determines are not duplicative of another agency's data collection. Several questions in the ACS appear in other demographic surveys but these results are typically not released as frequently as ACS results or at the same level of geography. The comprehensive set of ACS 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 to benchmark those results to the ACS, which is often the most authoritative source for local area demographic data.

The OMB Interagency Committee for the ACS, co-chaired by OMB and the Census Bureau, includes more than 30 participating federal 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.

The ACS Methods Panel program is the only testing vehicle for the ACS. There is no other program designed to improve the ACS. Testing for the ACS builds on research conducted for other surveys and by other statistical agencies. Specifically, lessons learned from ongoing decennial cognitive and field testing of mail materials and multilingual approaches inform the design of ACS testing.

Staff from the ACS program meet regularly with staff working on other demographic surveys to share test plans and research results. Proposals for content changes in the ACS also frequently build on research conducted for other federal surveys.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The collection of ACS data for housing units does not involve small businesses or other small entities.

The collection of ACS data for group quarters could include small entities (such as small group homes). Small group quarters facilities (defined as having fewer than 15 people) are eligible to be in sample only once every five years. The focus of the interview is on a sample of residents, not the business, though a facility administrator is involved in the data collection.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Collecting the data less frequently, on fewer sampled cases, would increase variances on the estimates produced from the ACS especially affecting small geographic areas. Many federal agencies would also not be able to implement programs as intended or meet requirements defined by policy and regulations. Examples of federal uses for the ACS data and associated laws (when applicable), are described in the ACS Handbook of Questions and Current Federal Uses.

<https://www.census.gov/programs-surveys/acs/operations-and-administration/2014-content-review/federal-uses.html>

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in

statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

This data collection does not require any of the special circumstances mentioned above.

- The ACS samples housing units in such a way that no housing unit can be in sample more than once every five years. Data for a sampled housing unit are collected once. If a person moves or has more than one location where they live, they can be in sample more than once.
- Respondents are instructed to respond to the survey as soon as possible, which avoids costly follow-up activities such as in person interviewing. However, once in sample a respondent has 3 months to respond to the survey.
- Other than the survey itself, respondents are not required to submit any documents.
- Respondents are not required to acquire or retain records for the survey.
- The data collected from the ACS and associated research studies result in statistics that are released or in reports documenting findings. The sample is designed to ensure sufficient geographic coverage so that the ACS can produce an accurate demographic snapshot by surveying a representative sample of the population.
- ACS survey results, including statistical estimates categories, are established and recognized as an official survey time series that has been used as survey benchmarks for other data collection programs for well over a decade.
- ACS survey materials include information related to Title 13 protections of the data collection and other associated federal regulations. The Census Bureau implements disclosure avoidance procedures on all of its products and complies with federal regulations related to data security policies.
- Respondents are not required to submit proprietary information. All information collected is protected by law.

8. **If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Consultation with representatives of those from whom information is to be obtained or those

who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The ACS frequently consults with persons outside of the Census Bureau to obtain views on a variety of topics. The ACS consults with data users, other federal agencies, and experts in the fields of survey methodology and statistics for feedback on the data produced from the survey as well as data collection activities, statistical techniques, and disclosure protection. For example, the Population Reference Bureau, in partnership with the Census Bureau, maintains an online community, organizes webinars and special sessions at professional meetings, and holds ACS Data Users Conferences.

The Census Bureau published a notice of our intent to conduct Methods Panel Testing for the ACS in the February 9, 2021 edition (Vol. 86, No. 25, pages 8756-8759) of the Federal Register (USBC-2021-0002). The Census Bureau received four public comments on this information collection submission.

- a. The Partnership for America's Children recommends that the Census Bureau conduct two studies related to the undercoverage of young children. First, they recommended the ACS survey parents with young children to ask them if they understand that young children are supposed to be included in the ACS survey roster and pointed to several decennial census research studies that suggested parents may not believe children should be included. Second, they suggested testing new language in the paper questionnaire and internet instrument to remind respondents to include young children in the ACS.

The Census Bureau acknowledges the important work that has already been done to understand the complex issues behind the undercount of young children in the decennial census. An ACS team was formed to undertake an update to the rostering approach to the ACS with this research in mind. Several of the ACS team members served on the Undercount of Young Children Task Force and other task force members have been consulted. The Census Bureau plans to test modifications to the ACS roster in all modes of data collection to try to reduce this undercount. Cognitive testing will be conducted as part of this development to aid in understanding of how respondents think about including young children.

The Partnership for America's Children also raised a concern about the proposed test to modify the paper questionnaire to only ask for detailed person data for up to four people instead of five. The Partnership is concerned that not collecting detailed data for Person 5 would be likely to have more of an impact on the completeness of data for young children than for adults.

The Census Bureau would like to clarify that removing Person 5 from the paper questionnaire does not mean that data for a 5th person of the household (or beyond)

would not be collected. As is currently done, large households (currently those with 6 or more people) provide basic information on the paper form and then are called back to complete the survey for those people. This change would explore redefining a large household as those with 5 or more people. Also, we note that this is specific to the paper questionnaire; all other modes of data collection will continue to collect data for up to 20 people in the household. However, the Census Bureau does acknowledge that not all large households complete the follow-up interview to complete details for everyone in their household. The purpose of this test to understand the impact of this on the data and we will pay particular attention to the impact on data for young children.

Finally, the Partnership supported the test of adaptive survey design for Nonresponse Followup suggesting that it might help improve the count of young children. Improving self-response rates for young parents would improve the count of young children, especially if rostering changes are made.

- b. The Asian Americans Advancing Justice and the Asian American Justice Center (AAJC) commented on several of the proposed tests. First, the Advancing Justice | AAJC supports the use of plain language in the ACS mail materials. The Advancing Justice | AAJC recommends that motivational messages should be updated to be responsive and sensitive to current conditions, such as the pandemic and resulting economic instability for some. They recommend that messages must be understood by different cultures and languages and that the Census Bureau continue to look for ways to engage language minority participants in-language (both for getting assistance and for self-response in-language).

The Census Bureau recognizes the challenges that the pandemic has created for many Americans. During data collection for 2020 and 2021, messages in the mail materials were modified to address this. The Census Bureau also tries to recruit a diverse set of respondents for cognitive testing of mail materials to understand different perspectives of a variety of people. The Census Bureau strives to provide high quality translations of our survey instruments and materials. In addition, our Language and Cross Cultural Research Group has been working on research to develop culturally appropriate doorstep messages for use by interviewers in different languages over the last decade. As part of the 2020 Census, researchers conducted virtual debriefing focus groups in seven languages to learn about bilingual enumerators' perspectives on Census messages, materials, and procedures. Results from that study, as well as ongoing Census research, will be incorporated into the survey and census materials and procedures development.

The Advancing Justice | AAJC also noted the inadequacy of administrative records race data for Asian American and Native Hawaiian and Pacific Islander subgroups and asked that the Census Bureau proceed with caution on the use of administrative records, on race and in general.

The Census Bureau understands that there are concerns surrounding the use of administrative data. We are committed to the quality of our data and will conduct thorough research prior to implementing the use of administrative data in our production operations.

In reference to the proposed Content Testing the Advancing Justice | AAJC asked that the testing take into consideration mode of response and language of response. They also recommended that content testing study the impact of the proposed changes alone as well as part of the larger survey. The Advancing Justice | AAJC also expressed disappointment that the Census Bureau did not select the version of the race question from the 2015 National Content Test that was the most successful. They are encouraging the Census Bureau to not wait for the next Decennial Census to modernize how questions on race and ethnicity are asked to more closely align with the way society currently views race and ethnicity.

In previous Content Tests the Census Bureau has analyzed responses by mode and will continue to do so. In the 2016 Content Test we also analyzed the responses by language (English and Spanish). The Census Bureau will consider the recommendation to look at other languages but cautions that typically there is not enough data in other languages during a Content Test to support analysis. As the Census Bureau evaluates the results of the 2020 Census race and ethnicity data, our experts will determine next steps for making improvements to future questions and data on race and ethnicity to be used in the American Community Survey, decennial census, and other demographic surveys. These discussions will be done in consultation with the U.S. Office of Management and Budget, Federal experts, advisors, and stakeholders.

For other proposed changes to ACS instruments and operations, the Advancing Justice | AAJC suggested that the Census Bureau look at language needs, even if not expanding language support, to understand how to allow for language expansion and support in the future. For example, consideration of technology that does not rely on the Roman alphabet.

The Census Bureau thanks the Advancing Justice | AAJC for this reminder and will take it into consideration moving forward.

- a. A letter written on behalf of 32 organizations recommended that the Census Bureau incorporate data collection on sexual orientation and gender identity (SOGI) to the ACS through the Methods Panel content testing process. They stress the importance of researching, testing, and evaluating each new question so that its inclusion allows for the collection of high quality data without reducing overall respondent participation. The letter cites disparities in housing, employment, and economic security among the lesbian, gay, bisexual, transgender, and queer (LGBTQ) population as a need for the data. The letter mentions that previously the ACS had received requests from the U.S. Department of Housing and Urban Development (HUD), U.S. Department of Justice (DOJ), the U.S. Department of Health and Human Services (HHS), and the U.S. Environmental Protection Agency (EPA) to include SOGI questions.

The Census Bureau remains committed to providing high quality data to ensure efficient and effective management of federal programs and services. The Census Bureau, working with the Office of Management and Budget and Interagency Council on Statistical Policy, has established criteria for determining content on the American Community Survey (ACS).

These criteria ensure that the ACS asks only what is necessary, constraining the length and burden of the ACS on the American public. It is incumbent upon federal agencies to identify their need for data and communicate this information to the Census Bureau. Requests for new or revised content for the ACS must demonstrate a statutory or regulatory need for data at small geographies or for small populations to be considered for the ACS. As mentioned in the letter, the Census Bureau received requests from four federal agencies in 2016 to add SOGI questions to the ACS for various needs. Three requests failed to meet the criteria for adding a subject to the ACS. The fourth agency withdrew its request. The Census Bureau does not currently have a request for sexual orientation or gender identity that meets the criteria.

- b. A private citizen raised concerns about the expense and ongoing nature of the ACS and duplication of survey information.

As discussed in sections 1, 2, and 4 above, the Census Bureau takes respondent burden very seriously and holds content additions and changes to strict standards. The Census Bureau has several processes in place, including the OMB Interagency Committee for the ACS, to avoid duplication of survey information. The Methods Panel program has successfully identified modifications to the ACS, specifically in increasing self-response rates, that reduce the overall cost of the ACS program. The Census Bureau also continues to explore the use of administrative data to reduce the burden to the public.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

The Census Bureau does not pay ACS respondents or provide respondents with gifts.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

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. Confidentiality information is sent to sampled housing units with the initial mail package. Housing units responding using the internet questionnaire are presented with additional assurances of their confidentiality and security of their online responses. At the beginning of follow-up interviews, the interviewer explains the confidentiality of data collected and that participation is required by law. The interviewer may also give the household respondent a copy of a letter from the Census Bureau Director explaining the confidentiality of all information provided and a Question and Answer Guide, as appropriate.

The brochure mailed to sample GQs with the GQ introductory letter contains assurances of

confidentiality. It is also provided to sampled GQ residents at the time of interview. The interviewer also explains the confidentiality of data collected and that participation is required by law. GQ administrators and GQ residents may ask for additional information. The interviewer may provide a Question and Answer Guide and a Confidentiality Notice, as appropriate to explain confidentiality regulations and standards.

ACS data collection is covered under the COMMERCE/CENSUS-10 American Community Survey system of records notice (SORN). Records are maintained to perform methodological evaluations and enhancements for data collection and quality control studies, and to undertake linkages with survey and administrative data for statistical projects as authorized by law and the Census Bureau. Additional information can be found here:

<https://www.osec.doc.gov/opog/PrivacyAct/SORNs/census-10.html>

The CEN30 IT system maintains the ACS data stored and processed on Census Bureau servers. This system interacts with other Census Bureau IT systems to collect, process, and store data. The Privacy Impact Assessment (PIA) for the American Community Survey can be found here:

https://www.osec.doc.gov/opog/privacy/Census%20PIAs/CEN30_FY20_PIA_SAOP_Approved.pdf

Related PIAs referenced in that document are located here:

<https://www.osec.doc.gov/opog/privacy/Census-pias.html>

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

Some of the data the Census Bureau collects on the ACS, such as race, ethnicity, disability, 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 Computer-Assisted Personal Interview (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 sensitive questions are used and how those data are 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.

Race and Ethnicity data are collected and classified in accordance with the OMB *Standards for the Classification of Federal Data on Race and Ethnicity* (1995).

- 12. Provide estimates of the hour burden of the collection of information.**

The ACS Methods Panel Testing program includes multiple tests over a period of 3 years.

Each test potentially includes a different number of respondents, though the ACS survey

has a similar burden in each test. The ACS estimates that the burden to complete the survey for an average household is approximately 40 minutes.

This is the maximum burden requested for these tests. Every effort is taken to use existing ACS sample for testing when the tests do not involve content changes. The use of existing ACS sample results in no additional burden to the public.

Estimated Annualized Respondent Burden Hours

Test	Type of Respondent	Estimated number of respondents	Number of Responses per Respondent	Average Burden per Response (in minutes)	Total Burden Hours
Self-Response Mail Messaging and Contact Strategies Testing	Household Respondent	Test A – 60,000 Test B – 60,000 Test C – 60,000 Test D – 60,000 Test E – 60,000 Test F – 60,000	1	40	Test A – 40,000 Test B – 40,000 Test C – 40,000 Test D – 40,000 Test E – 40,000 Test F – 40,000
Respondent Feedback Pilot	Household Respondent	100,000	1	42*	70,000
Use of Administrative Data Test	Household Respondent	100,000	1	40	66,667
Group Quarters Testing	Facility Administrator and Facility Resident	2,000 administrators 30,000 residents	1	15 for the facility interview 25 for the resident interview	13,000
Content Testing	Household Respondent	Test A – 70,000 Test B – 70,000	1	40	Test A – 46,667 Test B – 46,667
Content Testing	Household Respondent	Test A – 40,000 Test B – 40,000	1	40	Test A – 26,667

Follow-up Interview					Test B – 26,667
Internet Instrument Testing	Household Respondent	Test A – 60,000 Test B – 60,000 Test C – 60,000 Test D – 60,000 Test E – 60,000 Test F – 60,000	1	40	Test A – 40,000 Test B – 40,000 Test C – 40,000 Test D – 40,000 Test E – 40,000 Test F – 40,000
Respondent Help Testing	Household Respondent	40,000	1	10	6,667
Nonresponse Followup Data Collection Testing	Household Respondent	100,000	1	40	66,667
Total (over 3 years)		1,312,000			849,667
Annual Burden Hours		437,333			283,222

* This includes 40 minutes for the production ACS interview and 2 minutes for the optional follow-up questions.

Estimated Annualized Respondent Costs

Type of Respondent	Number of Respondents	Number of Responses per Respondent	Average Burden per Response	Hourly Wage Rate*	Total Burden Costs
Household Respondent	1,312,000	1	40	\$27.07	\$23,677,227
Facility Administrator	2,000	1	15	\$41.04	\$20,520
Facility Resident	30,000	1	25	\$7.25	\$90,625
Total	--	--	--	--	\$23,788,372

*The wage rate for household respondents is estimated based on average hourly rate among all occupations as reported by the Bureau of Labor Statistics as of May 2020. BLS's *Occupational Outlook Handbook* <https://www.bls.gov/bls/blswage.htm>

The wage rate for Facility Administrators is estimated based on an average among the various types of facility administrators (such as medical and health service managers and lodging managers at educational institutions) as reported by the Bureau of Labor Statistics as of May 2020.

The wage rate for Facility Residents (such as college students, group home residents, and nursing home residents) is estimated to be minimum wage.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

There are no direct costs to responding to the American Community Survey.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The Methods Panel Tests program is expected to cost an estimated \$4,000,000 per year. This cost includes staff time to conduct, analyze, and report on the tests as well as the cost to print materials and collect data.

15. Explain the reasons for any program changes or adjustments reported in ROCIS.

As an ongoing testing program, the ACS plans testing in 3-year increments in line with the OMB Clearance process. Testing proposed here is in reaction to emerging issues related to improving data quality, reducing data collection costs, and improving the ACS questionnaire content and related data collection materials. Changes in technology, emerging societal issues, and cutting-edge survey methodology necessitate testing to maintain the highest relevance for ACS survey estimates. Additionally, since the ACS Methods Panel can serve as a testbed for the decennial census, census methods that showed promise in the 2020 Census but could not be fully evaluated due to Census environment constraints are good candidates for ACS Methods Panel testing from 2021 to 2024. The agility of this ongoing testing program benefits the larger field of survey methodology, as well as contributing specifically to reducing survey cost, addressing data collection efficiencies, and improving data quality for the ACS and decennial census.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Data collected in the proposed Methods Panel Tests are analyzed at the conclusion of data collection. Results are published online roughly a year after the data collection for the test ends. This allows time to conduct thorough analysis, document the findings accurately, and

apply disclosure protections to the summary report.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The Methods Panel tests will display the expiration date on materials in line with the methods used for the production ACS. We request that we not display the OMB expiration date on the paper 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. Explain each exception to the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

The Census Bureau certifies compliance with [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#) for the ACS Methods Panel Tests program.