**SUPPORTING STATEMENT**

**U.S. Department of Commerce**

**U.S. Census Bureau**

**Generic Clearance for Emergency Economic Information Collections**

**OMB Control No. 0607-XXXX**

**PART A: Justification**

1. **1. Circumstances Making the Collection of Information Necessary**

The U.S. Census Bureau requests Office of Management and Budget (OMB) approval for a 3-year period, for a new generic clearance that provides the quick turn-around necessary for conducting emergency economic information collections (EEIC) in response to unanticipated international, national, or regional declared emergencies or events of national interest arising as a direct result of declared emergencies having a significant economic impact on U.S. businesses and/or state or local governments. The purpose of the collections will be to gauge and monitor the economic impact of such events on U.S. businesses or organizations and state or local governments.

The Coronavirus pandemic, in addition to having devastating effects on the health and wellbeing of the global population, has had a profound effect on the world economy. The Census Bureau, in carrying out its mission to serve as the nation’s leading provider of quality data about its people and economy, has sought to measure the effect on U.S. businesses through supplemental questions added to several of its recurring business surveys and a new special-purpose survey meant to measure the effect of the pandemic on small, employer owned businesses—the Small Business Pulse Survey (OMB number 0607-1014). Due to the need to collect data on a timely basis, the Census Bureau submitted these requests to the Office of Management and Budget under the emergency processing provisions of the Paperwork Reduction Act (PRA). Although that process allowed us to implement the collections in a timely manner, restrictions on the use of the PRA emergency process to revise or extend these collections hampered our ability to remain agile and to collect data on an ongoing basis as the Pandemic continued throughout 2020 and beyond. We believe that a generic clearance will benefit the Census Bureau, the reporting public, and the many stakeholders who will have great need for information during times of future unanticipated events.

Emergencies, once declared by the authorized state or federal official or entity, that could trigger the need for an EEIC may have global, national, or regional impact on U.S. businesses and governments, and include the following examples:

- Pandemic or other health emergency

- Natural or manmade disaster

- Acts of war or terrorism

- Civil unrest or insurrection

Other events of national interest arising as a direct result of declared emergencies may also have a significant impact on U.S. businesses or governments. An example of a recent such event is the computer chip shortage which has resulted from labor and resource shortages directly stemming from the effects of the Coronavirus pandemic. The computer ship shortage has had a significant effect on industries ranging from computer manufacturing to automobile production. Another example is the need to monitor and track production and exports of personal protective equipment (PPE) and vaccines that arose during the Coronavirus pandemic. General categories of national interest events arising as a direct result of declared emergencies which could trigger the need for an EEIC are:

- Economic crises

- Financial crises

- International geo-political instabilities

- Resource shortages

- Cyberterrorism

- New legislation passed as a direct result of a declared emergency

A declared emergency or national interest event arising as a direct result of a declared emergency would need to have a perceived impact on U.S. businesses and/or state or local governments in order for the Census Bureau to collect EEIC information in response.

EEIC questions may be included as supplemental questions on existing Census Bureau surveys or conducted as new special-purpose surveys. The data will be collected by paper or electronic instruments, depending on the survey or program.

The questions will be chosen from a pretested Question Bank. The Question Bank can be found at Attachment A. For some subjects, the Question Bank includes specific questionnaire content. In other cases, the Question Bank includes topics which will then be addressed with questions designed to meet data needs that arise during a future unknown event. Some questions have been cognitively tested and should be considered final; some may require testing for final wording. Questions that may require testing and refinement are annotated in the Question Bank. As the Question Bank matures with new or revised content, the Census Bureau will resubmit the bank for review.

The Census Bureau will first obtain approval for the generic clearance under the regular processing provisions of the PRA (the subject of this clearance request). The clearance request defines the scope and overall burden of information collections to be conducted under the generic clearance. As future emergencies arise, the Census Bureau will use the process defined below to obtain approval for individual EEIC’s.

Clearance process for an EEIC

1. Based on an emergency or national interest event arising as a direct result of a declared emergency, the Census Bureau decides to conduct an EEIC.
2. The OMB-OIRA Desk officer is notified of the EEIC immediately via e-mail, followed by receipt of the “Request for Emergency Economic Information Collection” (Attachment B) describing the emergency or resulting national interest event and the planned information collection. The supplemental questions or collection instrument will be attached to the Request for EEIC.
3. The Request for EEIC will include a date by which OMB approval is required. The standard review time for requests under this generic clearance will be 10 days. However, a review time of as few as 3 days may be requested. Special justification for any review time of less than 10 days will be included in the Request for EEIC.
4. The OMB-OIRA desk officer responds with approval or comments on the proposed EEIC within the timeframe specified in the Request for EEIC. OMB may provide approval and comments orally (followed by e-mail for written documentation) or by e-mail directly to the Census Bureau. This may occur before the request is submitted and received by OMB through the official ICR tracking system. If no response is received within the specified timeframe, the information collection is considered approved.
5. The Census Bureau maintains a library of data collection instruments that includes all final data collection instruments conducted under this generic clearance. This library and the burden expended is submitted to OMB quarterly as a non-substantive change to the generic clearance.
6. EEICs will last a maximum of 9 months.
7. A new Request for EEIC may be submitted under the generic clearance if the Census Bureau determines the need to revise an existing EEIC or to extend the collection past the initial 9 months.

Information collections conducted under this clearance are authorized by Title 13 U.S.C., Sections 131, 161 and 182 (Attachment C).

**2. Purpose and Use of Information Collection**

As data collections will be tailored to the emergency or resulting national interest event, users of the data may vary, but may include: federal, state, or local officials charged with decision- making during the emergency; business leaders and policymakers wishing to develop plans to ameliorate the effects of the emergency; academics and members of the press wishing to study and disseminate information about the emergency; and the public. The data collected will help us understand how and why data we collect in our ongoing surveys may be affected by the emergency, as well as allow us to disseminate data as part of existing releases, new releases, or experimental releases.

**3. Use of Improved Information Technology and Burden Reduction**

The vast majority of business and government surveys to which EEIC questions may be added, utilize the Census Bureau’s online reporting system called Centurion as their primary collection system. New information collections conducted under this generic clearance will also likely collect responses electronically using Centurion. Specific plans regarding the use of electronic reporting will be included in the Request for EEIC submitted to OMB in advance of any collection.

**4. Efforts to Identify Duplication and Use of Similar Information**

The questions will be designed to meet new and emerging needs and will not duplicate questions already asked on other collections.

**5. Impact on Small Businesses or Other Small Entities**

In cases where EEIC questions are added to existing business surveys, please refer to the most recently approved ICR for each survey detailing information about our efforts to lessen the impact of the collection on any small businesses which may be included in the collection. In the case of any new survey conducted under this generic clearance, this information will be included in the Request for EEIC submitted to OMB in advance of the collection.

**6. Consequences of Collecting the Information Less Frequently**

In cases where EEIC questions are added to existing business or government surveys, the frequency of collection will be the same as the underlying survey. EEIC collections will last a maximum of 9 months unless a need exists to continue the collection. In which case, a new Request for EEIC will be submitted. In the case of any new survey conducted under this generic clearance, the frequency of the collection, along with a justification for that frequency, will be included in the Request for EEIC submitted to OMB in advance of the collection.

**7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

EEIC data collection may need to be initiated within days of the request. Given the potential need for rapid data collection, respondents may be asked to respond to requests for data in fewer than 30 days. Any plans to request responses in fewer than 30 days will be included in the Request for EEIC submitted to OMB in advance of the collection.

**8. Efforts to Consult Outside the Agency**

The Census Bureau published a notice in the Federal Register on February 8, 2021 (vol 86, pg 8580-8581), announcing our plans to submit this request and inviting comment. No comments were received in response to that notice.

The Census Bureau consulted with the Bureau of Economic Analysis, Bureau of Labor Statistics, Federal Reserve Board, Centers for Medicare & Medicaid Services, International Trade Administration, Minority Business Development Agency, Bureau of Transportation Statistics, National Telecommunications and Information Agency, and Office of Tax Analysis/US Dept of Treasury in developing the SBPS and Coronavirus content for our ongoing surveys. Many of those questions are contained in the Question Bank. Information regarding any consultations that may be held as part of any future EEIC will be included the Request for EEIC submitted to OMB in advance of the collection.

**9. Explanation of Any Payment or Gift to Respondents**

Respondents will not be paid or provided with gifts.

**10. Assurance of Confidentiality and Reporting Requirement**

All information collected will be confidential based the provisions of Title 13 U.S.C., Section 9. Respondents will be informed of this through letters mailed to the respondent and displayed on the collection instrument.

Determinations about whether EEIC questions will be mandatory or voluntary will be made in consultation with legal counsel. This information will be included the Request for EEIC submitted to OMB in advance of the collection.

**11. Justification for Sensitive Questions**

The information to be collected is not of a sensitive nature and does not concern matters that are commonly considered private.

**12. Estimates of Annualized Burden Hours and Costs**

We estimate the potential maximum number of respondents to all EEIC’s in a given year is 300,000 and that the average burden of an EEIC will be 10 minutes. Therefore, total potential annual burden imposed in a single year is 50,000 hours. We base these estimates on our experience fielding similar questions on our ongoing business surveys and the Small Business Pulse Survey.

Specific sample sizes and burden hours of individual EEIC’s will be provided in the Request for EEIC submitted to OMB in advance of the collection.

|  |  |  |
| --- | --- | --- |
| Potential Annual Respondents | Average Burden per Questionnaire | Total Annual Burden |
| 300,000 | 10 minutes | 50,000 |

**13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers**

We do not expect respondents to incur any costs other than that of their time to respond. The information requested is of the type and scope normally known by respondents or carried in company records and no special hardware or accounting software or system is necessary to provide answers to this information collection. Therefore, respondents are not expected to incur any capital and start-up costs or system maintenance costs in responding. Further, purchasing of outside accounting or information collection services, if performed by the respondent, is part of usual and customary business practices and not specifically required for this information collection.

**14. Annualized Cost to the Federal Government**

In cases where EEIC questions are added to existing business or government surveys, please refer to the most recently approved ICR for each survey for information about cost to the Federal Government. In the case of any new survey conducted under this generic clearance, this information will be included in the Request for EEIC submitted to OMB in advance of the collection.

**15. Explanation for Program Changes or Adjustments**

The change in burden is attributable to the fact that this generic clearance is being submitted as a new collection.

**16. Plans for Tabulation and Publication and Project Time Schedule**

The data will be tabulated and published in accordance with the ongoing survey. This information will be used by analysts to explain the impact and trends of data within their industries or governments, provide insight to current and future state of the data for the industries or governments, and assist the mathematical statisticians on the application of seasonal adjustment and imputation methodologies.

In cases where EEIC questions are added to existing business or government surveys, please refer to the most recently approved ICR for each survey for information about tabulation and publication of the data. In the case of any new survey conducted under this generic clearance, this information will be included in the Request for EEIC submitted to OMB in advance of the collection.

**17. Request not to Display OMB Expiration Date**

Existing business surveys containing supplemental EEIC questions will display both the OMB control number for the underlying collection and the EEIC questions. We request an exemption of the requirement to display the expiration date of the EEIC questions in these cases since displaying two expiration dates on the same survey will be confusing to respondents.

Any new special-purpose survey will display the OMB control number and expiration date of this generic clearance.

**18. Exceptions to Certification for Paperwork Reduction Act Submissions**

There are no exceptions to the certification.