

SUPPORTING STATEMENT A
U.S. Department of Commerce
U.S. Census Bureau
Generic Clearance for Census Bureau Field Tests and Evaluations
OMB Control No. 0607-0971

Abstract

The U.S. Census Bureau is committed to conducting research towards census and survey operations that costs less while maintaining high quality results. The Census Bureau requests an extension, without change, of our previous OMB approval to conduct a series of studies to research and evaluate how to improve data collection activities for data collection programs at the Census Bureau. These studies will explore how the Census Bureau can improve efficiency, data quality, and response rates and reduce respondent burden in future census and survey operations, evaluations and experiments. This research program is for respondent communication, questionnaire and procedure development and evaluation purposes. We will use data tabulations to evaluate the results of questionnaire testing.

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.**

The U.S. Census Bureau is committed to conducting research towards census and survey operations that costs less while maintaining high quality results. The Census Bureau requests an extension, without change, of our previous OMB approval to conduct a series of studies to research and evaluate how to improve data collection activities for data collection programs at the Census Bureau. These studies will explore how the Census Bureau can improve efficiency, data quality, and response rates and reduce respondent burden in future census and survey operations, evaluations and experiments.

This information collection will operate as a generic clearance. The estimated number of respondents and annual reporting hours requested cover both the known and yet to be determined tests. A generic clearance is needed for these tests because though each share similar methodology, the explicit details of each test to be performed has yet to be determined.

Once information collection plans are defined, they will be submitted on an individual basis for

approval.

The Census Bureau plans to test the use of new and improved data collection techniques for self-enumeration and interviewer data-collection tasks surrounding and following the ongoing census and survey operations. The research and evaluation may include: research on public outreach, messaging, and similar invitations to participate in surveys; developing alternative enumeration or follow-up questionnaires; usability issues; conducting interviews or debriefings; and non-English language training and interviews. The questions asked in these studies will be typical census or survey questions and questions related to that content or attitudinal, opinion and satisfaction questions related to responding to Census Bureau surveys.

The Census Bureau plans to conduct these tests in small geographic areas or national samples over the next three years. We will follow the protocol of past generic clearances: at least 30 days before the scheduled start date of each field test, we will provide OMB with a detailed background on the activity, estimates of respondent burden, and samples of pertinent forms and/or questions.

In addition to the Field Tests listed above, economic programs are developing research activities, including field tests, to support survey program re-engineering, including, but not limited to, recommendations published by the National Academy of Sciences consensus study report on “Re-engineering the Census Bureau’s Annual Economic Surveys.”¹ In addition, economic programs, together with their reimbursable partners, co-sponsor a number of survey collections using Title 13 authority, and plan to conduct field tests prior to production, to ensure effective data collection instruments and procedures.

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.

This research program is for respondent communication, questionnaire and procedure development and evaluation purposes. We will use data tabulations to evaluate the results of questionnaire testing. The information collected in this effort shall not be released as official statistics. However, summarized results shall be released in methodological reports, or as a methodological appendix or footnote in a report containing data from a larger data collection effort. The results of this research may also be prepared for presentation at professional meetings or publication 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

¹ URL link: <https://www.nap.edu/catalog/25098/reengineering-the-census-bureaus-annual-economic-surveys>

Census Bureau and is incorporated into the clearance process required by the Paperwork Reduction Act.

- 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.**

The information will be collected through observations, self-response, face-face interviews, and/or telephone interviews. At least 75 percent of the data covered by this generic clearance will be collected through electronic instruments, with the remainder on paper questionnaires.

- 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.**

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 may involve collaboration with staff from other agencies that are sponsoring the surveys conducted by the Census Bureau. The research may also involve joint efforts with staff from other Federal Statistical Agencies. 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 survey communication materials, invitations, or questionnaires. However, this information is not sufficient to refine our census and survey invitations or questionnaires without conducting additional research which can be conducted concurrently with census and survey production work.

This generic clearance request is an explicit addition to the current generic clearance for pretesting (Number 0607-0725) that allows small-scale cognitive and usability testing research and the generic clearance for internet pretesting (Number 0607-0978) that allows medium-scale online pretesting. This generic clearance is different from the previous clearances in two ways. First, this clearance alone can collect data using the mandatory authorities provided for Decennial Census operations and testing, as well as for the Economic Census, the Census of Governments, annual economic survey programs, selected sub-annual economic programs, and/or reimbursable surveys co-sponsored with the Census Bureau or otherwise conducted with mandatory authority. These mandatory authorities have been repeatedly shown to increase response rates. Although we do not expect to invoke the mandatory authority on most studies, in some cases, where we need to study effects on response rate or to ensure adequate response to assess data quality reflecting the effectiveness of survey questions and collection instruments, it may be necessary to use the mandatory authority. This will be secondary to using the voluntary authority as the primary

collection authority. Second, this clearance focuses on field tests and evaluations, which typically occur concurrently with production census and survey work, in order to efficiently use existing resources and processes, rather than preceding census and survey work as is the case with the previously mentioned clearances. However, where no concurrent collections exist, such as for new initiatives or re-engineered surveys expected to carry mandatory authority, separate field tests may be needed to ensure adequate data quality and appropriate collection procedures prior to undertaking a full-scale survey.

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

To the extent possible, and as appropriate to address research questions, sample sizes for this research will be based on power analyses that identify the minimum number of cases needed to be able to detect substantive and statistically significant differences in treatment. This will minimize the number of respondents needed to test improvements to questionnaire design, test field data collection procedures and new technologies. For field tests involving households and individuals, we will attempt to exclude housing units that have been in sample for or other large Census Bureau surveys. For economic census/survey program field tests, sample sizes and selection may be targeted based on pre-determined criteria to support the goals of the field test; these will be detailed in each individual clearance request.

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.

These research activities are typical focused on individual research questions that are collected one time only. Responses may be used in future research studies that build upon the results of the current production census and survey work. Failure to research and test new methods could result in increased costs and less accuracy of future census and survey operations.

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;

This generic clearance will not require 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;

This generic clearance will not require 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;

This generic clearance will not require 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;

This generic clearance will not require 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;

This generic clearance will not be used to produce official statistics. However, summarized results shall be released in methodological reports, or as a methodological appendix or footnote in a report containing data from a larger data collection effort. The results of this research may also be prepared for presentation at professional meetings or publication in professional journals.

- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

This generic clearance will not require 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

This generic clearance will include assurances of confidentiality established in statute and supported by disclosure and data security policies consistent with statute.

- 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 Census Bureau regularly consults with outside parties in its census and survey planning. For example, 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.

The Census Bureau published a notice in the Federal Register on July 26, 2022 soliciting public comments on our plans to submit this request (Vol. 87, No. 142). We received one public comment from the American Atheists. This comment will be shared with the appropriate subject matter areas, as this Generic Clearance does not propose its own data collection but rather serves as a vehicle for pretesting and field testing other survey content.

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

In general, respondents will not be paid or provided any incentive for their participation. In certain situations, a small token or other incentive may be proposed. Details of this incentive will be outlined with each individual request submitted by the Census Bureau to OMB.

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.

All respondents who participate in research under this clearance will be informed that the information they provide will not be made available to anyone who is not a Census employee or does not have Special Sworn Status in any way that would personally identify an individual, household, business or other organization. They will also be informed that their participation is either mandatory or voluntary, depending on the collection authority. This disclosure will be made prior to any data collection.

Data collection for this project is authorized under the authorizing legislation for the questionnaire being tested. This may be Title 13, Sections 91, 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. Other titles may be referenced depending on the nature and source of questionnaires being pretested during the course of the clearance. Appropriate legal authority for pretesting other survey questionnaires, yet to-be-determined, will be referenced in each individual request for a field test under this generic clearance. Per the Federal Cybersecurity Enhancement Act of 2015, data are protected from cybersecurity risks through screening of the systems that transmit data.

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.

For most demographic surveys conducted by the Census Bureau, most of the questions

included on the questionnaires are not of a sensitive nature and are not anticipated to pose a problem to respondents. For many establishment surveys conducted by the Census Bureau, most questions may be answered based on business/organizational records; this may impose minimal reporting burden in excess of that experienced under current economic data collections. However, it is possible that some questions could be perceived as sensitive, or, in establishment surveys, requested information may be considered by the business to be strategic or proprietary. One of the purposes of testing included here is to identify such questions, determine sources of sensitivity and/or reporting burden, and alleviate them insofar as possible in future production surveys. Additionally, confidentiality will be emphasized to relieve respondent concerns.

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

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under ‘Annual Cost to Federal Government’ (Item #14).**

Title	Description	Burden Hours	N	Total annual burden hours
Small -Scale Response Testing (SmaRT)	The Decennial Directorate is beginning the small-scale response testing (SmaRT) program – a part of the 2030 Census design selection phase – to answer research questions outside of larger mid-decade census tests. Two tests (n=25,000 each) are planned per year with individual research questions to be determined.	10 minutes	50,000	8,333 hours

Title	Description	Burden Hours	N	Total annual burden hours
Re-engineering the Census Bureau's Annual Economic Surveys	Census Bureau economic programs are currently considering conducting field tests to answer research questions about the integrate annual survey. Several small qualitative and large quantitative studies are being considered with individual research questions to be determined. These burden hours are only estimates.	3.5 hours per case	2,000	7000 hours
Subtotal				
	Yet Unknown	33 min	48,000	26,334
		25 min	100,000	41,667
Total Burden		minutes/ participant	Participants	Hours

Specific plans for each field test, including pre-specified selection criteria, will be provided in Individual Request for Clearance documents submitted to OMB prior to conducting the pretest.

The total estimated respondent burden is 41,667 hours annually. A variety of activities will be conducted under this clearance and the exact dates and number of households, businesses/organizations, and respondents for all activities are estimated at this time. The estimate of hour burden is based on our current expectations and planned work.

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 costs to demographic survey respondents other than that of their personal time to respond. For field tests of establishment surveys, 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 carried in company records and no special hardware or accounting software or system is necessary to provide answers to prospective information collections.

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 annual costs to the Federal Government associated with each specific test are to be determined as the individual tests are planned.

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

We are not requesting any changes to the burden estimates reported in ROCIS.

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.

The agency will not be developing official statistics based on data collected in this clearance. A schedule for completing each activity will be provided in the Individual Request for Clearance document submitted to the OMB that will precede the activity.

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 agency plans to display the expiration date for OMB approval of the information collection on all instruments

18. Explain each exception to the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

The agency certifies compliance with 5 CFR 1320.9 and the related provisions of 5 CFR 1320.8(b)(3).