**SUPPORTING STATEMENT**

**U.S. Department of Commerce**

**U.S. Census Bureau**

**Generic Clearance for Emergency Economic Information Collections**

**OMB Control No. 0607-1019**

**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 extension of the generic clearance for Emergency Economic Information Collections (EEIC). The EEIC generic clearance provides the quick turn-around necessary for conducting emergency economic information collections 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 need for the EEIC generic clearance was first realized during the Coronavirus Pandemic. The Coronavirus pandemic, in addition to having devastating effects on the health and wellbeing of the global population, 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, 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). This allowed us to implement these collections quickly but did not provide for public involvement in the clearance process. The generic clearance benefits the Census Bureau, the reporting public, and the many stakeholders who will have great need for information during times of future unanticipated events. The generic clearance process promotes transparency by providing the public the opportunity to comment ahead of implementation. It also allows the Census Bureau to implement emergency collections of information in a timely manner.

Emergencies, once declared by the authorized state, local, 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 chip 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 EEIC generic clearance has been used twice over its initial 3-year term of approval. The EEIC was used to add supplemental questions to several recurring Principal Federal Economic Indicator (PFEI) surveys to measure the effects of significant economic events. The PFEIs provide near – real-time measurement of the current state of the economy. However, in recent years, numerous unprecedented events of national interest that include, but are not limited to, a global pandemic, war in the Ukraine, supply chain shocks, price increases, and changes in the Federal Reserve fund rates have significantly impacted U.S. businesses and governments. EEIC questions added to the PFEI surveys facilitated the production of additional data products to complement existing statistics and provided additional insight to policymakers, data users, the public, and businesses on current economic conditions.

The EEIC generic clearance was also used to obtain pre-approval to add supplemental questions to several recurring PFEI surveys to measure the economic impact of severe weather events such as severe storms, flooding, landslides, mudslides, tornados, wildfires, straight-line winds, mudflows, debris flows, etc. Due to the unpredictable nature of severe weather and the immediate and devastating effects that can occur, the Census Bureau needs to be able to quickly measure its economic impact. No severe weather EEIC questions have yet been added to PFEI surveys.

The questions will be chosen from a pretested Question Bank. 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. The Census Bureau expects the Question Bank to mature over time. New or revised content for the Question Bank will be tested ahead of use, following best statistical practice, and the testing methods and content will be submitted to OMB for review prior to beginning the testing, as required by the PRA, through the appropriate mechanism. Following testing and finalization of new or revised content for the Question Bank, the Census Bureau will resubmit the bank for review.

The Question Bank was initially pretested in 2021 prior to the inception of the generic clearance. The Census Bureau conducted a second round of testing in 2023 and has developed a Version 2 Question Bank. The Question Bank Version 2.0 can be found at Attachment A, and a Round 2 Cognitive Testing Report at Attachment B.

This 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 determines whether there is a need for conducting an EEIC, and identifies the proposed scope of the EEIC.
2. The OMB-OIRA Desk officer is notified immediately via email of the Census Bureau’s determination of a need for and the proposed scope of the EEIC. Discussion between the OMB-OIRA Desk officer and the Census Bureau may occur.
3. The Census Bureau will then submit a “Request for Emergency Economic Information Collection” (Attachment C) describing the emergency or resulting national interest event and the planned information collection, including detailed information about the methods for collection, the timeframe for collecting the information, sampling, and other statistical aspects of the collection. The supplemental questions or collection instrument will be attached to the Request for EEIC.
4. The Request for EEIC will include a date by which OMB approval is needed. The standard review time for requests under this generic clearance will be 10 business days. However, a review time of as few as 3 business days may be requested. Special justification for any review time of less than 10 business days will be included in the Request for EEIC.
5. OMB will review the Request for EEIC. Only following OMB approval will the information collection begin.
6. The Census Bureau will maintain a publicly available library of data collection instruments that includes all final data collection instruments conducted under this generic clearance.
7. EEICs may be fielded for the timeframe specified in the Request for EEIC and agreed to by OMB.
8. A new Request for EEIC may be submitted under the generic clearance if there is a need to revise an existing EEIC or to extend the collection past the agreed-to timeframe.

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

**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. A description of the purposes and uses of each EEIC will be included in the Request for EEIC submitted to OMB in advance of the collection.

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

The vast majority of business and government surveys to which EEIC questions may be added use 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 are not expected to duplicate questions already asked on other collections. Any duplication will be addressed in the Request for EEIC submitted to OMB in advance of the collection.

**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. 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 May 29, 2024 (vol 89, pg. 46360 - 46361), announcing our plans to submit this extension request and inviting comment. No credible comments were received in response to that notice.

Information regarding consultations that may be held as part of any EEIC will be included in 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 Hour Burden per Questionnaire | Total Annual Burden Hours |
| 300,000 | 10 minutes | 50,000 hours |

The two EEICs cleared over the past three years used 168,200 respondents and 34,783 burden hours. We believe the estimates in the table are reflective of anticipated use over the upcoming three years.

**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**

The costs of developing the generic clearance request and of developing and testing the Question Bank are approximately $1.1 million. The incremental cost of adding EEIC questions to an existing survey or the cost of any new survey conducted under this generic clearance will be included in the Request for EEIC submitted to OMB in advance of the collection.

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

The burden of this collection remains unchanged.

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

The data may be tabulated and published in accordance with an ongoing survey and/or may be the subject of a separate publication. Plans for tabulation, publication and a project schedule 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.