September 16, 2024

Memorandum for: Reviewer of 1220-0025

From: Courtney Lam, Economist, Division of International Prices

Subject: NonSubstantive Change for the International Price Program

 (IPP) Survey – Respondent Letters

The IPP requests approval for collection materials to be used by Field Economists during initiation, including three intro letters (one generic and two used for drop-in visits) and nine variations of a refusal letter (one generic and eight based upon specific refusal reasons). In addition, IPP request approval of a one-time email to be sent to current responders notifying them of the use of Census Trade Data.

The Field mails the generic intro letter (**IPP Intro Letter Sept 2023.docx**) to the companies sampled for inclusion in the Import and Export Price Indexes survey. The letter explains the importance of participating in the survey and includes BLS’ confidentiality pledge. (Note that there may be special circumstances when an intro letter is not sent, such as when a cooperative current reporter immediately agrees to participate).

The generic intro letter (Attachment 10 - **IPP Intro Letter Sept 2023.docx**) was included with IPP’s most recently approved full clearance package. This letter has been updated for 508 compliancy; the new version includes the following changes:

* Addresses the current or potential respondent solely as <First Name, Last Name>

(as opposed to <Mr./Ms. First Name, Last Name> or as <Mr./Ms. Last Name>)

* Includes the line “IPP Private and Public Sector Uses” above the bulleted sections
* Refers to the Field Economist solely as <First Name, Last Name>

(as opposed to <Mr./Ms. Last Name>)

The drop-in intro letters incorporate the generic intro letter as a template and can be used by the Field Economist when attempting collection in-person. There are two variations of the drop-in intro letter, one for cases in which a company’s info was known at the start of the collection attempt (Attachment 10a - **IPP Drop-in Letter With Info Sept 2023.docx**) and the other for cases in which a company’s info was not known at the start of the collection attempt (Attachment 10b - **IPP Drop-in Letter No Info Sept 2023.docx**). Like the generic intro letter, the drop-in intro letters also outline the importance of survey participation and include BLS’ confidentiality pledge.

In addition to a generic refusal letter (Attachment 25 - **IPP Refusal Generic.docx**) which highlights the importance of the Import and Export Price Indexes, explains the importance of participation in the survey, and provides assurances of confidentiality for survey participation, IPP has drafted individual refusal letters which address all of the following scenarios:

* Sampled company agreed to participate but has not yet provided all of the data needed (Attachment 25a - **IPP Refusal Data Follow-Up.docx**)
* Sampled company believes that their volume of trade is not significant enough to warrant participation (Attachment 25b - **IPP Refusal Insignificant Trade.docx**)
* Field Economist has not been able to make contact with the sampled company (Attachment 25c - **IPP Refusal Last Attempt.docx**)
* Sampled company has declined participation due to confidentiality concerns (Attachment 25d - **IPP Refusal Letter Confidentiality.docx**)
* Sampled company has declined on the basis that there is a company policy to not participate in voluntary surveys (Attachment 25e - **IPP Refusal Letter Policy.docx;** FE can update highlighted areas, as needed)
* Sampled company has declined on the basis that participation would be too time-consuming (Attachment 25f - **IPP Refusal No Time.docx**)
* Sampled company has declined on the basis of little / no (perceived) value to the Import and Export Price Indexes (Attachment 25g - **IPP Refusal No Value.docx**)
* Sampled company has declined on the basis that their business is too small to be of value to the Import and Export Price Indexes (Attachment 25h- **IPP Refusal Small Business.docx**)

The Field Economist can send these refusal letters to the sampled companies, as appropriate, as another attempt to secure cooperation after an initial refusal.

Lastly, the IPP requests approval for an email notification (Attachment 26 - **IPP Reporter Notice CTD.docx**) to be sent to all respondents (in November 2024) with an email address. The email thanks them for their participation in the survey, informs them of the upcoming expansion of published indexes using trade data (provided by the Census Bureau), and notifies them that some respondents will see a reduction in the number of prices requested (from IPP) due to the expansion.

None of the changes described in this nonsubstantive change request affect respondent burden, as reported in IPP’s most recent full clearance request approved on 7/31/2024.

If you have any questions about this request, please contact Courtney Lam at lam.courtney@bls.gov.

Attachments

Attachment 10 – IPP Intro Letter Sept 2023

Attachment 10a – IPP Drop-in Letter with Info Sept 2023

Attachment 10b – IPP Drop-in letter with No info Sept 2023

Attachment 25 – IPP Refusal Generic

Attachment 25a – IPP Refusal Data Follow-up

Attachment 25b – IPP Refusal Insignificant Trade

Attachment 25c – IPP Refusal Last Attempt

Attachment 25d – IPP Refusal Letter Confidentiality

Attachment 25e – IPP Refusal Letter Policy

Attachment 25f – IPP Refusal No Time

Attachment 25g – IPP Refusal No value

Attachment 25h – IPP Refusal Small Business

Attachment 26 – IPP Reporter Notice CTD