

SUPPORTING STATEMENT A
U.S. Department of Commerce
U.S. Census Bureau
Generic Clearance for 2030 Census Small-Scale Tests, Evaluations, and Database Updates
OMB Control No. 0607-XXXX

Abstract

The U.S. Census Bureau plans to request OMB approval for a three-year period for a new Generic Information Collection to conduct a series of studies to research and evaluate how to improve data collection activities for 2030 Census programs at the Census Bureau. In addition, the Census Bureau plans to use this generic clearance to test updating address databases and other datasets used to plan and conduct larger tests and the 2030 Census itself. Both the database updates and the studies are informed by recommendations developed from lessons learned from previous censuses, suggestions received from stakeholders, focus groups, as well as the results of earlier research studies. Under this Generic Information Collection, the Census Bureau plans to test implementing some of those recommendations and suggestions. 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 tests, operations, evaluations, experiments, and database updates. Having it as a Generic Information Collection will also provide the quick turn-around necessary for conducting tests in response to unanticipated international, national, regional, or state-level emergencies and other disruptions that could have a major impact on the development and planning of census operations.

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 decennial census operations that produce an efficient, effective, and quality census that counts the people of our nation, once, only once and in the right place. The Census Bureau requests a new information collection for obtaining generic clearances to conduct a series of studies to research and evaluate how to improve data collection activities for 2030 Census data collection programs at the Census Bureau and to update Census Bureau databases in support of the 2030 Census. 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 and database updates because though each share similar methodology, the explicit details of each test and database update 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 the following: 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.

The Census Bureau is collecting these data under the authority of Title 13, United States Code, Sections 141, 191, 193, 221, and 223. Please see Title 13 U.S.C. sections 141, 191, 193, 221, and 223 in Attachment A for more information about this legal authority.

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. Data tabulations will also be used to assess the suitability and coverage issues of any datasets acquired to support 2030 tests and operations as well as testing improvements for 2030 Census test operations and the 2030 Census itself. The information collected in these efforts 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 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, telephone interviews and/or data uploads. The majority 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. The research may 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 decennial census and survey data before we attempt to revise decennial communication materials, invitations, or questionnaires. However, this information is not sufficient to refine our census invitations or questionnaires without conducting additional research which can be conducted concurrently with census production work.

This generic clearance request is an explicit addition to the current generic clearance for field tests and evaluations (Number 0607-0971) that allows studies for new and improved techniques for self-enumeration and interviewer data collection, the 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 latter three clearances in two ways. First, this clearance can collect data using the mandatory authorities provided for decennial census operations and testing. These mandatory authorities have been repeatedly shown to increase response rates. Second, this clearance focuses on small-scale field tests and evaluations, which typically occur before 2030 Census production work or concurrently with production on larger-scale census test work, in order to efficiently use existing resources and processes, rather than preceding census work as is the case with the previously mentioned clearances. This generic clearance is different from the one for field tests and evaluations because it will also allow for collection of database updates in support of 2030 Census testing and field tests and evaluations approved under it will be only in support of the 2030 Census. Information requests that would have previously been made under 0607-0971 will henceforth be conducted under this clearance to keep 2030 Census approvals in one record.

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 other large-scale decennial surveys at the Census Bureau. For dataset updates, selection may be targeted based on pre-determined criteria to support the goals of the dataset update; 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 typically focused on individual research questions that are collected one time only. Response data 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. Similarly, failure to update datasets could result in increased costs, less accuracy, and more attempts needing to be made to contact facilities.

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 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, including in support of the implementation of Statistical Policy Directive No. 15 Federal Race and Ethnicity Data Standards (SPD 15).

- 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.

- 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 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.

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 September 12, 2024, soliciting public comments on our plans to submit this request (Vol. 87, No. 142). We received four public comments.

- One comment offered advice on what survey and data quality metrics to measure while conducting tests and evaluations and requested that the Census Bureau ensure that all small-scale tests work toward collecting data that support the quality metrics mentioned. The Census Bureau strives to integrate quality across the survey lifecycle of each iteration of the Small-Scale Response Testing (SmaRT) program from design through data collection and ultimately analysis. Sample and experimental design for SmaRT focuses on obtaining representative respondents while making every effort to minimize respondent burden, which is relatively low for the decennial-like, test questionnaires. In addition, we offer multimode response options such as the internet self-response instrument and paper questionnaires to enable respondents to respond in their preferred mode. In addition, we cognitively test all public-facing materials before sending SmaRT survey invitations to our sample addresses. Throughout our data collection, we carefully monitor key metrics to minimize/eliminate processing and system errors. In addition, all estimates and results must meet or exceed quality standards that are consistent with standards set across the field of survey methodology, professional associations, and the federal government.
- Another comment expressed support for continuing the small-scale testing program but encouraged the Census Bureau to revise the “Every Door Direct Mailer” test to include a split panel design for assessing the effectiveness of a message about including young children, and ideally testing at least two different messages as well as a control group. The Census Bureau is exploring if we can use the 2027 panel of the Small-Scale Response Testing program to evaluate the effectiveness of an Every-Door Direct Mailer (EDDM) to inform respondents about counting young children in the decennial census.
- A third comment stated that "executing small scale response tests utilizing the Internet Choice contract strategy rather than the Internet First contact strategy is important to identifying tactics that can increase response among persistently undercounted groups." The comment also stated, "[It] is critical...the Census Bureau examine effectiveness not just by increased self-response but specifically increased self-response among groups that have persistently been undercounted." We agree that it is critically important to examine effectiveness not just by increased self-response but specifically increased self-response among groups that have persistently been undercounted and have incorporated that goal into the Small-Scale Response Testing (SmaRT) program. The SmaRT program used the contact strategy of sending the invite to respond via Internet in the first mailing with a paper questionnaire sent in the fourth mailing (i.e., Internet First contact strategy). We did not restrict the SmaRT surveys' target population to 2020 Census Internet First tracts; the SmaRT target population was housing units that had mailable addresses across the nation (excluding those addresses sampled for recent decennial tests to reduce burden). In the 2025 SmaRT iteration, we will be testing using the Internet First

and Internet Choice designations, similar to what 2030 production may look like.

- The fourth comment asked the Census Bureau to conduct one or more small-scale tests of methods for collecting home addresses of incarcerated people to determine how best to implement a revision of the Residence Criteria and Residence Situations for people who are in correctional facilities on Census Day. As in previous decades, the Census Bureau will review the Residence Criteria and Residence Situations ahead of the 2030 Census. We will begin our review in early 2025 and then gather public input by engaging with stakeholders.

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 system 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 mandatory. 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 141, 191, 193, 221, 223. Per the Federal Cybersecurity Enhancement Act of 2015, data are protected from cybersecurity risks through screening of the systems that transmit data.

Summary information will be available to the public, including other Federal Agencies, in any proposed reports but only after applying disclosure avoidance techniques to protect the confidentiality of respondent data. Individual responses also are protected by the Privacy Act and subject only to the uses provided in the Commerce/Census-5, Decennial Census Program System of Records Notice. See <https://www.osec.doc.gov/opog/PrivacyAct/SORNs/census-5.html>. The corresponding Privacy Impact Assessment is "Associate Director for Decennial Census Programs (ADDCP) Decennial," signed September 20, 2023.

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.

Most of the questions included on the questionnaires are not of a sensitive nature and are not anticipated to pose a problem to respondents. However, it is possible that some questions could be perceived as sensitive; or, in database updates possibly from businesses or outside organizations, 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. 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).**

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 Census Bureau roughly estimates that, during the three-year period of this clearance, two currently planned tests will go to 216,000 respondents a piece (70,000 burden hours each); four potential experiments/tests on Group Quarters will average 50-60 respondents (an average of 15-20 burden hours) and as-yet unknown tests, evaluations, or database updates might go to 25,000 to 37,500 respondents (7,300 to 10,000 burden hours). In addition, the Census Bureau might have to collect information from 30,000 to 55,000 respondents (5,000 to 9,000 burden hours) in response to declared disasters.

Collection	Description	Burden Minutes/ Response	Cummu- lative Response s	Cummu- lative Burden Hours	Annualized Responses	Total Annual Burden Hours
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Small -Scale Response Testing (SmaRT)	The Decennial Directorate is planning two small-scale response testing (SmaRT) program tests – to answer research questions outside of larger mid-decade census tests. Two tests (n=216,000 each) are planned per year with individual research questions to be determined.	19.3 minutes	432,000	140,000 hours	144,000	46,700 hours
Group Quarters and Service Based Enumeration	The Decennial Directorate is planning 4 tests for group quarters and service-based enumeration.	15 minutes	235	60 hours	80	20 hours
As yet unplanned tests, evaluations, or database updates	N/A	18 minutes	25,000-37,500	7,300-10,000 hours	8,300-12,500	2,400-3,300 hours
Unplanned collections in response to declared disasters	N/A	10 minutes	30,000-55,000	5,000-9,000 hours	10,000-18,300	1,700-3,100 hours
Totals			487,200-524,700	152,000-159,000 hours	162,400-174,900	50,800-53,100 hours

The total estimated respondent burden is roughly 51,000 – 53,000 hours annually. The latter figure is a slight reduction from the 55,000 hours the Census Bureau estimated in the 60-day Federal Register Notice for this generic information collection, and it was reduced for programmatic reasons. 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 respondents to small-scale 2030 Census tests, evaluations and database

updates other than that of their personal time to respond. For field tests and database updates from organizations and governments, 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 organizational 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.

This is a new collection request, so 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).