

**Generic Information Collection Request:  
Cognitive Interviewing for Race and Ethnicity Interagency Technical Working Group (R/E  
ITWG): Census/SAMHSA Study**

**Request:** The Census Bureau plans to conduct, with the Substance Abuse and Mental Health Services Administration (SAMHSA), additional research under the generic clearance for questionnaire pretesting research (OMB number 0607-0725). We will be conducting cognitive interviews with establishments to test questions proposed by the Interagency Technical Working Group on Race and Ethnicity Standards (R/E ITWG), as outlined in the January 2023 Federal Register Notice<sup>1</sup>.

Office of Management and Budget (OMB) maintains government-wide standards for collecting Federal race and ethnicity data. These government-wide standards ensure the consistent reporting of these data by federal statistical agencies, allowing the comparison of information and data across Federal agencies and informing Federal programs that serve a diverse America. On January 26, 2023, OMB's Office of the Chief Statistician released an initial set of recommended revisions proposed by the R/E ITWG to revise OMB's statistical standards for collecting and reporting race and ethnicity data across Federal agencies. On January 27, 2023, OMB published a Notice and Request for Comments on the R/E ITWG's initial proposals.

The purpose of this request is to test proposed changes to race and ethnicity data collection. This project is necessary and essential to further the mission of the Census Bureau in that it will help the Census Bureau assess the effects of potential revisions to the government-wide standards on surveys and censuses conducted by the Census Bureau under Title 13, United States Code. Simultaneously, it will help SAMHSA assess the effects of potential revisions on surveys conducted by SAMHSA under the Public Health Service Act (42 USC 290aa(p)). SAMSHA and the Census Bureau will share the results of this test with the R/E ITWG.

Specifically, this testing seeks to answer the following research questions:

- What records do establishments have concerning the race/ethnicity of their [owners, staff, students, prisoners, clients, etc.]?
- What are the best approaches for collecting information on race/ethnicity from establishments? In other words, what question(s) and/or response options should be used?

**Purpose:** The purpose of testing will be to 1) assess how data collection participants currently complete their reporting of race and ethnicity items and what records may be used (similar to a Response Analysis Study); 2) assess whether the proposed questions are measuring the underlying constructs of interest; 3) improve understanding of the feasibility of supplying the requested data; 4) examine the burden of compiling responses to the questions, and 5) examine the burden of implementing changes to the data items. The specific research goals will answer the questions (above) posed by the R/E ITWG. The feedback from these interviews will be used

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<sup>1</sup> <https://www.federalregister.gov/documents/2023/01/27/2023-01635/initial-proposals-for-updating-ombs-race-and-ethnicity-statistical-standards>

to possibly refine question wording.

**Population of Interest:** Potential participants will be state representatives and facility managers who would normally be respondents to establishment surveys.

**Timeline:** Testing will be conducted during Late April to June 1, 2023.

**Language:** Testing will be conducted in English and Spanish (for those representatives or facilities in Puerto Rico). Spanish translations were performed by the Census Bureau.

**Method:** The purpose of cognitively testing the proposed questions is to minimize measurement error and maximize the validity of these questions by assessing whether the questions accurately measure the underlying construct of interest. Cognitive interviewing is a method of pretesting instruments that involves in-depth interviewing, paying particular attention to the mental processes respondents use to respond to questions<sup>2</sup>. Cognitive interviewing uses a framework dependent on evaluating questions against their outcome objectives, including accurately eliciting the underlying construct of interest, and to what level of accuracy respondents can provide data in response. Establishment respondents have the added issue of having to match questions to their administrative databases, too.

Researchers plan to complete 14 moderated interviews over videoconference (Teams or Zoom). The interviewers for this study both have over a decade of experience in questionnaire testing and cognitive interviewing with establishment participants.

The interviewers will follow a semi-structured interview protocol (Attachment A). Interviewers will send the proposed R/E items (from the FRN<sup>3</sup>) to respondents, via email, prior to interview so that respondents can examine it prior to the discussion.

At the beginning of the interview, respondents will be read a short confidentiality statement (see protocol) and asked to verbally consent to the interview. If they do not consent to the interview, the interview will be terminated. If they do not consent to being audiotaped, the interviewers will ask that participants send an email confirming consent.

**Sample:** We will contact up to 20 state representatives and 30 treatment facility managers to yield a maximum of 14 completed cognitive interviews total (over one round).

For the state representatives, SAMHSA maintains a list of substance use and mental health state representatives that will be used for recruitment and selection.

For facility managers, participants will be recruited using a sample file of mental health facilities from SAMHSA's Online Treatment Locator ([www.findtreatment.gov](http://www.findtreatment.gov)).

**Recruitment:** We will use the recruitment plan that is standardized for U.S. Census Bureau

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<sup>2</sup> Campanelli, P. 2007. "Methods for Testing Survey Instruments." *Short Course, Joint Program in Survey Methodology (JPSM)*. Arlington, VA.

<sup>3</sup> <https://www.federalregister.gov/documents/2023/01/27/2023-01635/initial-proposals-for-updating-ombs-race-and-ethnicity-statistical-standards>

economic surveys (Willimack et al., 2023):

1. Recruitment email (see Attachment A) – describe the purpose and voluntary nature of the study, how to schedule appointment, and researcher’s information
2. Capabilities email after appointment scheduling – describe necessary computer capabilities, reaffirm willingness, and include *OMB proposed R/E items*
3. Confirmation email sent morning of interview appointment – remind of time and any consent questions, and additional information
4. Interview email 30 minutes prior to interview – confirm videoconference information and any survey items sent
5. Interview

If email recruitment is not meeting our recruitment goals, we will move to telephone calls, as sometimes emails from .gov addresses end up in junk folders.

**Protocols:** Attachment B contains the draft protocol. It utilizes the “Business Information Accessibility Scale” as specified in Willimack et. al (2023).

The protocol is also attached in Spanish for possible interviews with state representatives and facility managers in Puerto Rico.

**Use of incentive:** Monetary incentives for participation will not be offered.

Below is a list of materials to be used in the current study:

**Attachment A:** Recruitment email text, including Spanish

**Attachment B:** Protocol including Spanish, outlining intended questions to guide the moderated interviews

**Length of interview:** For moderated cognitive interviews, we expect that each interview will last no more than 20 minutes (14 cases x 20 minutes per case = 4.67 hours).

Additionally, to recruit respondents we expect to reach out to 50 potential participants via email and to make up to 3 phone contacts per completed case. The recruiting emails and calls are expected to last on average 3 minutes per call (3 attempts per phone call per completed case x 50 cases x 2 minutes per case = 5.0 hours). Thus, the estimated burden for the moderated cognitive interviews is 9.67 hours.

The Census contact person for questions regarding data collection and statistical aspects of the design of this research is listed below:

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SAMHSA staff contacts are Kathryn Downey Piscopo ([Kathryn.piscopo@samhsa.hhs.gov](mailto:Kathryn.piscopo@samhsa.hhs.gov)) and Herman Alvarado ([herman.alvarado@samhsa.hhs.gov](mailto:herman.alvarado@samhsa.hhs.gov))