

SUPPORTING STATEMENT A
U.S. Department of Commerce
U.S. Census Bureau
2026 Operational Test in Support of the 2030 Census
OMB Control No. 0607-0936

Abstract

The 2026 Operational Test in Support of the 2030 Census (hereafter the “Test”) is a major American Community Survey (ACS) test planned as an iteration of the American Community Survey Methods Panel to help the Census Bureau prepare for the 2030 Census. To best fit its role as an operational test for the 2030 Census, the ACS electronic instrument will be adjusted appropriately. The Test is not an end-to-end test of all operational work. Instead, it is a scaled-down version of the selected aspects of the census allowing us to test in real world situations and on a larger scale than research simulations allow. The Test will test the viability of new and revamped systems and methods researched and developed for the census; to identify, document, and address potential challenges. Additionally, the Test will evaluate and assess the use of United States Postal Service (USPS) staff to increase efficiency in various capacities typically performed by temporary Census Bureau field workers. Some decisions, including names of operations and workload estimates for those operations, have yet to be made; however, at this time, the Census Bureau can present aspects of the test that affect the public.

For Self-Response, the Test will ask all questions that are in the ACS paper questionnaire but in electronic format and not necessarily in the order they appear in the ACS. For In-Field Enumeration (IFE), the Test will use a smaller subset of the ACS questions.

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.

During the years preceding the 2030 Census, the U.S. Census Bureau will pursue its commitment to conducting a quality decennial census through rigorous research and testing of operations and systems.

The Test builds on and is informed by small-scale tests and research the Census Bureau has conducted so far this decade. Early in the decade, the Census Bureau engaged in dozens of research projects built on lessons learned from the 2020 Census and informed and affirmed by public feedback. Small-scale tests are being conducted to refine the operations and technologies that worked successfully for the 2020 Census, as well as to introduce and test additional innovations for the 2030 Census. For example, the 2023 Census Test, the 2024 Census Survey, and

the 2024 National Census Survey provided insight into how people engage with the online questionnaire and the invitation materials they received in the mail. These small-scale tests allow the Census Bureau to gather swift, well-defined results, and give us the ability to leverage approaches that do not require major field tests. Additionally, small-scale tests enable the determination of whether certain innovations require additional field testing. Research projects and small-scale testing paved the way for the Census Bureau to decide what enhancements to test in this Test. In turn, the Test will serve as trial of the enhanced processes and methods, seeing how they work in real-world operations and at scale.

We are conducting the Test under the authority of Title 13, U.S. Code, Sections 23(c), 141, 193, 221, and 223. Article 1, Section 2 of the U.S. Constitution mandates the conduct of a census every 10 years. The Test will help shape data collection for the next census, the 2030 Census. The Census Bureau is required by law to protect Test information (Title 13, U.S. Code, Section 9). The Census Bureau is not permitted to publicly release responses in a way that could identify anyone. By law, the Census Bureau can only use responses to produce statistics.

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.

The Census Bureau needs to test improvements/enhancements/new methods to determine if they are feasible for inclusion in operations for the 2030 Census. The results of this test also will inform the Census Bureau's preparations for end-to-end testing for the 2028 Dress Rehearsal. Census tests are necessary to prepare for, initiate, and conduct the decennial censuses required by Article 1, Section 2 of the U.S. Constitution and as delegated by Congress to the Secretary of Commerce under 13, U.S.C. § 141. As further delegated by the Secretary of Commerce pursuant to 13 U.S.C. § 4 and 15 U.S.C. § 1516, the Census Bureau is required to conduct the 2030 Census to collect the person and housing data that will be used for apportionment and redistricting. The Census Bureau also produces statistical data products made available to a variety of consumers of this information, including public and private organizations and persons.

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.

See <https://www.census.gov/about/policies/quality/guidelines.html> for more information about the Census Bureau's Information Quality Guidelines.

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.

Respondents will initially have the option to self-respond to the Test using the internet on various devices (e.g. computers, tablets, smartphones). Non-responding households will be visited by enumerators who will collect responses using a handheld device for the in-field enumeration instrument.

The Test is heavily dependent on specific information technology systems, and a key objective of the test is devoted to validating the integration of systems with each other and with the operations they support. The test will employ automated systems to recruit, select, hire, administer and manage training, manage workloads, route field workers, create management reports, and process responses.

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.

A decennial census is required by Article 1, Section 2 of the U.S. Constitution and Title 13, U.S. Code. No other organization performs this specific activity. The decennial census is the only source of the data used for apportionment and redistricting. There is no program, operation, or activity that duplicates the scope and uses of decennial census data, as laid out in Section 2, Needs and Uses.

As mentioned above, while the Census Bureau has conducted tests on focused aspects of proposed enhancements for the 2030 Census, the Test is necessary to test refinements made in response to small-scale testing and to test how enhancements work together and at scale.

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

No small businesses or other small entities will be impacted – data collection will only take place for housing units.

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.

If this collection of information does not occur, it would significantly negatively impact the Census Bureau's ability to conduct integrated testing of 2030 Census systems, procedures, and field infrastructure, and thus the ability to refine operations before the 2030 Census. Frequency cannot be decreased, as this is a one-time data collection activity.

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;
 - The Test 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;

- No special circumstances exist that would require respondents to prepare a written response to this 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;
 - No special circumstances exist that would require respondents to submit more than an original and two copies of any document.
- Other than the survey itself, respondents are not required to submit any documents.
 - No special circumstances exist that would require respondents to submit any documents other than the survey itself.
- requiring respondents to retain records, other than health, medical, government contract, grant-in- aid, or tax records for more than three years;
 - Respondents are not required to produce or retain records for the survey.
- 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;
 - The Test is not in connection with a different statistical survey.
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
 - In 2024, the U.S. Office of Management and Budget (OMB) published the results of its review of Statistical Policy Directive No. 15 (SPD 15) and issued updated standards for maintaining, collecting and presenting race and ethnicity data across federal agencies. The updated 2024 SPD 15 requires the use of a combined race and ethnicity question, the addition of a new “Middle Eastern or North African” minimum reporting category, and the collection of detailed race and ethnicity responses. ACS will implement the finalized 2024 SPD 15 published by OMB on March 28, 2024, in the 2027 ACS data collection cycle. The first ACS 1-year estimates produced using the updated standards will be the 2027 ACS 1-year data, planned for release in September 2028.

Testing for ACS, including this data collection, will use the same content as production ACS unless specifically testing content changes.
- 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
 - No special circumstances exist that would require 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

- 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.

- o No special circumstances exist that would require data collection to take place in this manner.

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 frequently consults with persons outside of the Census Bureau to obtain views on a variety of topics. The Census Bureau consults with data users, other federal agencies, and experts in the fields of survey methodology and statistics for feedback on the data produced from the survey. A similar process is followed for data collection activities, statistical techniques, and disclosure protection.

The Census Bureau published a notice of our intent to conduct Methods Panel Testing for the ACS in the October 23, 2024, edition (Vol. 89, No. 205, pages 84526-84529) of the Federal Register (USBC-2024-0027). These comments are addressed under Justification part 8 in the Supporting Statement A document located here at [reginfo.gov](https://www.reginfo.gov). The four public comments received from the ACS Methods Panel Tests are available here at [regulations.gov](https://www.regulations.gov).

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

The Census Bureau does not plan to provide any payment or gift to respondents.

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.

The "Privacy Act Notice" will be provided to respondents to inform them about the importance of the census, why the information is collected and how it is used, their responses are mandatory and that the Census Bureau is required by law to protect their responses. The systems of records notice for this collection is Census-5 Decennial Census Program available at <https://www.commerce.gov/node/4939>

There is a privacy impact assessment for this collection titled "Associate Director for Decennial Census Programs (ADDCP) Decennial, signed July 2025. It is available at

<https://www.commerce.gov/opog/privacy/PIA/Census-PIA>.

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.

The Test will ask no questions of a sensitive nature.

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).

Estimated Annualized Respondent Burden Hours						
Description of Collection Activity	Corresponding Form Number	# of Respondents (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Burden Hours / Response (d)	Total Annual Burden Hours (e) = (c) x (d)
Self-Response	D6-Q1(E)	77,300	1	77,300	40/60	51,533
In-Field Enumeration	D6-QE-IFE	77,300	1	77,300	10/60	12,883
Totals		154,600				64,417

Table - Estimated Annualized Respondent Costs

Description of Collection Activity	# of Respondents	Annual # of Responses / Respondent	Burden Hours / Response	Hourly Wage Rate*	Total Burden Costs
Self-Response	77,300	1	40/60	\$23.80	\$1,226,493
In-Field Enumeration	77,300	1	10/60	\$23.80	\$306,623
Totals	154,600	1			\$1,533,117
*Based on the median hourly wage for all U.S. residents from the Bureau of Labor Statistics Occupational Employment and Wage Statistics available here https://data.bls.gov/oes/#/industry/000000					

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 other than their time to participate in this data collection.

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 life-cycle cost of this collection for the 2026 Operational Test in Support of the 2030 Census iteration of the ACS Methods Panel is estimated to be \$5 million. This estimate includes conducting, managing, and supporting this collection. More specifically, this includes the direct costs of recruiting and deploying enumerators (both USPS and Census) and field supervisors for data collection, mobile devices for field staff, printing, postage, and telephone assistance. This estimate includes salaries for field/support staff, and NPC printing/mailing staff. The estimate does not include IT development costs or HQ staff to support the Test. The methods utilized to produce this estimate relied on past decennial census data collection activities including the 2020 Census and past tests. The hours required to complete this work depends primarily on the workloads and productivity measures as defined by the Test team.

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

As an ongoing testing program, the ACS plans testing in 3-year increments in line with the OMB Clearance process. Testing proposed here is in reaction to emerging issues related to improving data quality, reducing data collection costs, and improving content and related data collection materials. Changes in technology, emerging societal issues, and cutting-edge survey methodology necessitate testing to maintain the highest relevance for survey estimates. Additionally, the ACS Methods Panel can serve as a testbed for the decennial census. The agility of this ongoing testing program benefits the larger field of survey methodology, as well as contributing specifically to reducing survey cost, addressing data collection efficiencies, and improving data quality for the decennial census.

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.

We are not planning on publishing results.

Activity/Milestone	Date/Range
Conduct Self-Response and IFE	April 2026 – September 2026

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)

Attachment: Project Plan for the Evaluation of the 2026 Operational Test in Support of the

