

SUMMARY:

The Technical Guidelines Development Committee (the "Development Committee") has scheduled a plenary meeting for March 22nd and 23rd, 2007. The Committee was established in 2004 to act in the public interest to assist the Executive Director of the U.S. Election Assistance Commission (EAC) in the development of voluntary voting system guidelines. The Development Committee has held seven previous meetings. The proceedings of these plenary sessions are available at <http://vote.nist.gov>. The purpose of the eighth meeting of the Development Committee will be to review and approve a draft of recommendations for future voluntary voting system guidelines to the EAC. The draft recommendations respond to tasks defined in resolutions passed at the previous Technical Guideline Development Committee meetings.

SUPPLEMENTARY INFORMATION:

The Technical Guidelines Development Committee (the "Development Committee") has scheduled a plenary meeting for March 22nd and 23rd, 2007. The Committee was established pursuant to 42 U.S.C. § 15361, to act in the public interest to assist the Executive Director of the Election Assistance Commission in the development of the voluntary voting system guidelines. The Technical Guidelines Development Committee held their first plenary meeting on July 9, 2004. At this meeting, the Development Committee agreed to a resolution forming three

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working groups: (1) Human Factors & Privacy; (2) Security & Transparency; and (3) Core Requirements & Testing to gather information and review preliminary reports on issues pertinent to voluntary voting standard recommendations. At subsequent plenary sessions, additional resolutions were debated and adopted by the TGDC. The resolutions define technical work tasks for NIST that assist the TGDC in developing recommendations for voluntary voting system guidelines. The Development Committee approved initial recommendations for voluntary voting system guidelines at the April 20th & 21st, 2005 meeting. The recommendations were formally delivered to the EAC in May 2005 for their review. In September of 2005, the Development Committee began review of preliminary technical reports for the next iteration of voluntary voting system guidelines. The Committee will review and debate draft recommendations for the next iteration of voluntary voting system guidelines at the March 22nd and 23rd, 2007 meeting.

CONTACT INFORMATION: Allan Eustis 301-975-5099. If a member of the public would like to submit comments concerning the Committee's affairs at any time before or after the meeting, written comments should be addressed to the contact person indicated above, c/o NIST, 100 Bureau Drive, Mail Stop 8970, Gaithersburg, Md. 20899 or to voting@nist.gov.

009065



U.S. ELECTION ASSISTANCE COMMISSION
1225 New York Ave. NW – Suite 1100
Washington, DC 20005

SUNSHINE ACT NOTICE

AGENCY: United States Election Assistance Commission

ACTION: Notice of Public Teleconference Meetings for the Working
Subcommittees of the Technical Guidelines Development
Committee

DATES & TIMES: Tuesday, April 3, 2007 at 10:30 AM ET
Thursday, April 5 at 11AM ET
Thursday, April 5 at 1 PM ET
Tuesday, April 10, 2007 at 10:30AM ET
Thursday, April 12 at 11AM ET
Friday, April 13 at 11AM ET
Tuesday, April 17, 2007 at 10:30AM ET
Thursday, April 19 at 11AM ET
Friday, April 20 at 11AM ET
Tuesday, April 24, 2007 at 10:30AM ET
Thursday, April 26 at 11AM ET
Thursday, April 26 at 1 PM ET
Tuesday, May 1, 2007 at 10:30AM ET
Thursday, May 3 at 11AM ET

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Friday, May 4 at 11AM ET

Tuesday, May 8, 2007 at 10:30AM ET

Thursday, May 10 at 11AM ET

Friday, May 11 at 11AM ET

Tuesday, May 15, 2007 at 10:30AM ET

Thursday, May 17 at 11AM ET

Friday, May 18 at 11AM ET

Tuesday, May 22, 2007 at 10:30 AM ET

Friday, May 25 at 11AM ET

STATUS:

Audio recordings of working subcommittee teleconferences are available upon conclusion of each meeting at:

http://vote.nist.gov/subcomm_mtgs.htm . Agendas for each teleconference will be posted one week in advance of each meeting at the above website.

SUMMARY:

The Technical Guidelines Development Committee (the "Development Committee") was established to act in the public interest to assist the Executive Director of the U.S. Election Assistance Commission (EAC) in the development of voluntary voting system guidelines. The Committee held their first plenary meeting on July 9, 2004. At this meeting, the Development Committee agreed to a resolution forming three working groups: (1) Human Factors & Privacy; (2) Security & Transparency; and (3) Core Requirements & Testing to gather and analyze information on relevant issues. These working subcommittees

propose resolutions to the TGDC on best practices, specifications and standards. Specifically, NIST staff and Committee members will meet via the above scheduled teleconferences to review and discuss progress on tasks defined in resolutions passed at Development Committee plenary meetings. The resolutions define technical work tasks for NIST that will assist the Committee in developing recommendations for voluntary voting system guidelines. The Committee met in its eighth plenary session on March 22-23, 2007. Documents and transcriptions of Committee proceedings are available at:

<http://vote.nist.gov/PublicHearingsandMeetings.html>

SUPPLEMENTARY INFORMATION:

The Technical Guidelines Development Committee (the "Development Committee") was established pursuant to 42 U.S.C. § 15361, to act in the public interest to assist the Executive Director of the Election Assistance Commission in the development of the voluntary voting system guidelines. The information gathered and analyzed by the working subcommittees during their teleconference meetings will be reviewed at future Development Committee plenary meetings.

CONTACT INFORMATION: Allan Eustis 301-975-5099. If a member of the public would like to submit written comments concerning the Committee's affairs at any time before or after subcommittee teleconference meetings,

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written comments should be addressed to the contact person indicated
above, or to voting@nist.gov.



U.S. ELECTION ASSISTANCE COMMISSION
1225 New York Ave. NW – Suite 1100
Washington, DC 20005

SUNSHINE ACT AMENDED NOTICE

AGENCY: United States Election Assistance Commission

ACTION: Notice of Public Meeting

DATE & TIME: Wednesday, April 18, 2007, 1:00 – 4:00 P.M.

PLACE: Westin Crown Center
Room: Washington Park 3
One East Pershing Road
Kansas City, Missouri 64108
(816) 474-4400

AGENDA The Commission will receive a presentation on and consider adopting a Spanish translation glossary of election terminology. The Commission will elect a vice-chair and will receive a presentation on the development of its election management guidelines. The Commission will also consider other administrative matters.

THIS MEETING WILL BE OPEN TO THE PUBLIC

PERSON TO CONTACT FOR INFORMATION: Bryan Whitener
Telephone: (202) 566-3100

009070



U.S. ELECTION ASSISTANCE COMMISSION
1225 New York Ave. NW – Suite 1100
Washington, DC 20005

SUNSHINE ACT NOTICE

AGENCY: United States Election Assistance Commission

ACTION: Notice of Public Meeting

DATE & TIME: Thursday, May 17, 2007, 10:00 A.M. – 1:00 P.M.

PLACE: U.S. Election Assistance Commission
1225 New York Ave, N.W., Suite 150
Washington, D.C. 20005
(Metro Stop: Metro Center)

AGENDA The Commission will receive updates on the activities of the following: The EAC Standards Board; the EAC Board of Advisors; and the EAC Technical Guidelines Development Committee (TGDC). The Commission will consider other administrative matters.

THIS MEETING WILL BE OPEN TO THE PUBLIC

PERSON TO CONTACT FOR INFORMATION: Bryan Whitener
Telephone: (202) 566-3100

009071



U.S. ELECTION ASSISTANCE COMMISSION
1225 New York Ave. NW – Suite 1100
Washington, DC 20005

SUNSHINE ACT NOTICE

AGENCY: United States Election Assistance Commission

ACTION: Notice of Public Meeting for the Technical Guidelines
Development Committee

DATE & TIME: Monday, May 21, 2007, 9:00 AM to 5:30 PM EST
Tuesday, May 22, 2007, 8:30 AM to 2:00 PM EST

PLACE: National Institute of Standards and Technology
100 Bureau Drive, Building 101, Employees Lounge
Gaithersburg, Maryland 20899-8900.

STATUS: This meeting will be open to the public. There is no fee to attend,
but, due to security requirements, advance registration is required.
Registration and additional meeting information will be available at
<http://www.vote.nist.gov> by May 1, 2007. This meeting will be web
cast.

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SUMMARY:

The Technical Guidelines Development Committee (the "Development Committee") has scheduled a plenary meeting for May 21st and 22nd, 2007. The Development Committee was established in 2004 to act in the public interest to assist the Executive Director of the U.S. Election Assistance Commission (EAC) in the development of voluntary voting system guidelines. The Development Committee has held eight previous meetings. The proceedings of these plenary sessions are available at <http://vote.nist.gov>. The purpose of the ninth meeting of the Development Committee will be to review and approve a revised draft of recommendations for future voluntary voting system guidelines to the EAC. The draft recommendations respond to tasks defined in resolutions passed at the previous Development Committee meetings as well as a review of an initial draft of recommendations presented at the March 2007 plenary meeting.

SUPPLEMENTARY INFORMATION:

The Technical Guidelines Development Committee (the "Development Committee") has scheduled a plenary meeting for May 21st and 22nd, 2007. The Committee was established pursuant to 42 U.S.C. § 15361, to act in the public interest to assist the Executive Director of the Election Assistance Commission in the development of the voluntary voting system guidelines. The Technical Guidelines Development Committee held their first plenary meeting on July 9, 2004. At this meeting, the Development Committee agreed to a resolution forming three

working groups: (1) Human Factors & Privacy; (2) Security & Transparency; and (3) Core Requirements & Testing to gather information and review preliminary reports on issues pertinent to voluntary voting standard recommendations. At subsequent plenary sessions, additional resolutions were debated and adopted by the TGDC. The resolutions define technical work tasks for NIST that assist the TGDC in developing recommendations for voluntary voting system guidelines. The Development Committee approved initial recommendations for voluntary voting system guidelines at the April 20th & 21st, 2005 meeting. The recommendations were formally delivered to the EAC in May 2005 for their review. In September of 2005, the Development Committee began review of preliminary technical reports for the next iteration of voluntary voting system guidelines. The Committee will review, debate and approve draft recommendations for the next iteration of voluntary voting system guidelines at the May 21st and 22nd, 2007 meeting.

CONTACT INFORMATION: Allan Eustis 301-975-5099. If a member of the public would like to submit comments concerning the Committee's affairs at any time before or after the meeting, written comments should be addressed to the contact person indicated above, c/o NIST, 100 Bureau Drive, Mail Stop 8970, Gaithersburg, Md. 20899 or to voting@nist.gov.

009074



"Beverly, Pamela L."
<Pamela_L._Beverly@omb.eop.gov>

09/19/2006 03:00 PM

To adwitt@tva.gov, angela.arrington@ed.gov, bjs1@nrc.gov, callen@peacecorps.gov, charles.mierzwa@rrb.gov, ctrowbridge@ustda.gov, cunninghamcs@state.gov,
cc "Zeiber, Jacqueline A." <Jacqueline_A._Zeiber@omb.eop.gov>, "Bushi, Nancy S." <Nancy_S._Bushi@omb.eop.gov>, "Ware, LaTonya R."
bcc

Subject Notice of Actions Update

This is to inform you that as of today you will no longer be receiving Notice of Actions or Reports from our former system.

ROCIS is to be used for all types of Notice of Actions and Reports.

Our former system will be totally stopped at the end of October, so please check your agency systems to make sure that all the information for your files are up to date. I will not be able to send you any materials from our former system after October.

However, all of OIRA's data from the former system has been migrated to ROCIS and is available there.

Also, those on your staff who do not have access to ROCIS, can always check our web site for information regarding a submission's status. The web site is www.RegInfo.gov and information from production is moved there nightly.

Remember, ROCIS is interactive, and you can verify the status of your submissions at anytime by checking your submitted and concluded boxes.

Thank you and have a good afternoon.

009075



"Zeiber, Jacqueline A."
<Jacqueline_A_Zeiber@omb
.eop.gov>

01/12/2007 11:03 AM

To adwitt@tva.gov, angela.arrington@ed.gov,
callen@peacecorps.gov, charles.mierzwa@rrb.gov,
ctrowbridge@ustda.gov, cunninghamcs2@state.gov,
cc "Echols, Mabel E." <Mabel_E_Echols@omb.eop.gov>,
"Gayle, Darcel D." <Darcel_D_Gayle@omb.eop.gov>,
"Johnson, Kim I." <Kim_I_Johnson@omb.eop.gov>, "Jones,
bcc

Subject ROCIS Data Base being updated over long wkend!!--please
note unavailable after 9 pm tonight. Thanks.

History:

✉ This message has been replied to.

When you log in to ROCIS today, you will see the following note.

"The ROCIS system will be down for routine maintenance from Friday, January 12, 2007 at 9:00 PM until 6:00 AM, Tuesday, January 16, 2007. If you have any questions regarding this matter, please contact Mike Johnson (202) 208-7659."

Just so you know why, we are "migrating" ALL of the historical records from our former system, RMS, into ROCIS over the weekend. You may have noticed that they are already in the practice site at <http://192.136.12.204/rocis/>

We have been testing them there for the last week and are pretty close to being able to put them into ROCIS so that every OMB Control Number will have a complete OMB Control Number History all the way back to 1974. Important to note that the farther back we go, the fewer data fields are completed, but I think you will be very impressed with what is there and what you are able to do with the records; i.e., searching back to the 1970's and even creating an ICR from one that has been historically active a long long time.

Nancy Bushi is the STAR of this production along with her sidekick, Brenda Raj, who you don't see often but is very there into the wee hours of the morning sometimes. They have worked closely with our application contractor, CyberData, to make sure the records don't break the system and the system doesn't break the records. We owe them all a great big THANK YOU.

So wish us luck today as we complete our testing and fixing and over the weekend as we load these records into the production application. We will also load them into the website in a week or so, which will enable the public to see our history as well.

So all of this to THANK YOU AGAIN for your patience and please get all your work done by 9:00 p.m. tonight or it will have to wait until Tuesday morning after our celebration of Martin Luther King holiday on Monday.

Jacke Zeiber

OMB OIRA ROCIS Project Leader

202-395-4638

009076



"Zeiber, Jacqueline A."
<Jacqueline_A_Zeiber@omb
.eop.gov>

09/28/2006 05:35 PM

To adwitt@tva.gov, angela.arrington@ed.gov, bjs1@nrc.gov,
callen@peacecorps.gov, charles.mierzwa@rrb.gov,
ctrowbridge@ustda.gov, cunninghamcs2@state.gov,
cc "Aguilar, Brenda" <Brenda_Aguilar@omb.eop.gov>, "Astrich,
Katherine T." <Katherine_T_Astrich@omb.eop.gov>,
"Champagne, Maurice B."

bcc

Subject Important Msg--ROCIS ICR Module Certification Page

Agency Clearance Officers:

It has come to my attention that there is a misunderstanding as to how to use the certification page when submitting ICRs to OIRA.

Check mark the box for each and every provision in order to CERTIFY that your Agency has complied with the PRA provisions.

Leave blank only those check boxes for provisions for which you CANNOT CERTIFY your Agency's compliance and discuss why you did NOT or were NOT able to certify compliance of the un-check-marked PRA provision in the supporting statement.

OIRA Desk Officers will review the certification pages and will look for the statement of noncompliance in the supporting statement for those provisions that WERE NOT check-marked.

Thank you.

Jacke Zeiber

OMB OIRA ROCIS Project Leader

202-395-4638

009077



"Zeiber, Jacqueline A."
<Jacqueline_A_Zeiber@omb.eop.gov>

09/26/2006 02:32 PM

To lotero@eac.gov
cc
bcc

Subject RE: ROCIS ICR Module Workshop October 3!!

History: This message has been replied to.

I have booked a space for you in the 10 – 12:30 a.m. class, Tuesday, October 3, Room 5031, GSA Building, 1800 F Street, NW.

Please confirm plan to attend.

Thanks.

Jacke Z

From: lotero@eac.gov [mailto:lotero@eac.gov]
Sent: Monday, September 18, 2006 11:46 AM
To: Zeiber, Jacqueline A.
Subject: Re: ROCIS ICR Module Workshop October 3!!

Hello,

I am submitting an ICR (and possibly two), or at least hoping to on the week of October 2nd. If this training will assist in learning how to submit the ICRs via the ROCIS, I will be more than happy to attend. Also, I have played around with the sample ROCIS and gotten familiar with it. When would you like me to call you to discuss how it went? Overall, it went well; my questions are more about the information/documents we need to attach when it's an emergency review and when it's a normal review - I need to know the exact information these documents need to have so the ICR review process goes smoothly. Thank you!

Laiza N. Otero
Research Associate
U.S. Election Assistance Commission
1225 New York Avenue, Suite 1100
Washington, DC 20005
Tel. (202) 566-3100 (main office)
Tel. (202) 566-2209 (direct)
Fax (202) 566-3128

"Zeiber, Jacqueline A."
<Jacqueline_A_Zeiber@omb.eop.gov>

09/15/2006 05:53 PM

Toadwitt@tva.gov, angela.arrington@ed.gov, bjs1@nrc.gov, callen@peacecorps.gov, charles.mierzwa@rrb.gov, ctrowbridge@ustda.gov, cunninghamcs@state.gov, cyberdata@fakegsa.gov, denise.mclamb@mail.va.gov, dhynek@doc.gov, donald_bieniewicz@ios.doi.gov, ebrya@opic.gov, germaine.white@eeoc.gov, grace.sutherland@eia.doe.gov, gscott@cftc.gov, jacqueline.white@sba.gov, jeffrey.martus@hg.doe.gov, jgmancus@ibb.gov, jgregory@fmc.gov, judith-b.berman@fcc.gov, jyandik@jwod.gov, kayej@fhfb.gov, kcook@presidiotrust.gov, kcramer@cns.gov, klion.catherine@pbgc.gov, laurieann.duarte@gsa.gov, lglatz@cpsc.gov, lgravely@oshrc.gov, lillian.deitzer@hud.gov, liz.davidson@ssa.gov, llarsen@jamesmadison.com, lotero@eac.gov, lpankey@ftc.gov, "Wright, Lauren E." <Lauren_E_Wright@omb.eop.gov>, lynn.bryant@usdoj.gov, marc@asc.gov, marilyn.levitt@stb.dot.gov,

009078

martinsons@sec.gov, mbtoomey@opm.gov, michael.miller@ferc.gov, michael.robinson@treas.gov,
michelle.e.long@frb.gov, mills.ira@dol.gov, murdock@nmb.gov, paula.sweeney@sss.gov,
pledvina@oge.gov, rbaker@fmshrc.gov, rdanvers@imls.gov, rdecker@arc.gov, ruth.brown@usda.gov,
sabrina.nelson@associates.dhs.gov, sdaisey@neh.gov, seleda.perryman@hhs.gov, shanft@fdic.gov,
smclaughlin@itc.gov, solomon.bush@exim.gov, splimpto@nsf.gov, tamee.fechhelm@nara.gov,
tcrews@ncua.gov, thahn@nclis.gov, timothy.korb@mspb.gov, twilson@adf.gov, tyglesias@truman.gov,
walter.kit-1@nasa.gov, welshm@arts.endow.gov, westlund.rick@epa.gov, wheeler@udall.gov,

Patricia.Lawton@dot.gov

CC:john.thomas@gsa.gov, carolyn.newsome@gsa.gov

SuROCIS ICR Module Workshop October 3!!

bje
ct

Great news!! Carolyn at RISC has been able to get the GSA training room again for two workshops on October 3, 2006.

I'll hold the workshops at 10 to 12:30 and 1:30 to 4:00 at the main GSA building, 1800 F Street NW, in room 5031.

I still have a waiting list but willing to consider folks that need to prepare submissions for October, November and December.

Please send me list of those that you wish me to consider by next Friday, 22 September.

Thanks for your patience.

We are trying now for room in November.

Jacke Zeiher

OMB OIRA ROCIS Project Leader

202-395-4368

009079



"Zeiher, Jacqueline A."
<Jacqueline_A_Zeiher@omb
.eop.gov>

09/15/2006 05:53 PM

To adwitt@tva.gov, angela.arrington@ed.gov, bjs1@nrc.gov,
callen@peacecorps.gov, charles.mierzwa@rrb.gov,
ctrowbridge@ustda.gov, cunninghamcs@state.gov,
cc john.thomas@gsa.gov, carolyn.newsome@gsa.gov
bcc

Subject ROCIS ICR Module Workshop October 3!!

History:

 This message has been replied to.

Great news!! Carolyn at RISC has been able to get the GSA training room again for two workshops on October 3, 2006.

I'll hold the workshops at 10 to 12:30 and 1:30 to 4:00 at the main GSA building, 1800 F Street NW, in room 5031.

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Please send me list of those that you wish me to consider by next Friday, 22 September.

Thanks for your patience.

We are trying now for room in November.

Jacke Zeiher

OMB OIRA ROCIS Project Leader

202-395-4368

009080



"Zeiber, Jacqueline A."
 <Jacqueline_A_Zeiber@omb.eop.gov>

09/08/2006 05:12 PM

To lotero@eac.gov

cc "Hunt, Alexander T." <Alexander_T_Hunt@omb.eop.gov>

bcc

Subject RE:

History: This message has been replied to

Per our telecon, you don't have PRA staff users. As long as you put Juliet's name as CIO and place an A for her privileges and your name as clearance officer with an A, you are all set. Thanks. JackeZ

From: lotero@eac.gov [mailto:lotero@eac.gov]
Sent: Friday, September 08, 2006 5:10 PM
To: Zeiber, Jacqueline A.
Cc: Hunt, Alexander T.
Subject: Re:

Hello,

Thank you very much for the documents and the access to the test website. For the spreadsheet, I have a question on whose names go on the following:

Clearance Officer/POC for ROCIS Implementation
III. PRA Staff Users:
ICR Reviewing Officials:

I have printed out the agreements and completed the spreadsheet (except for the above), and should be ready to send it back on Monday. Thank you and I look forward to speaking with you next week.

Laiza N. Otero
 Research Associate
 U.S. Election Assistance Commission
 1225 New York Avenue, Suite 1100
 Washington, DC 20005
 Tel. (202) 566-3100 (main office)
 Tel. (202) 566-2209 (direct)
 Fax (202) 566-3128

"Zeiber, Jacqueline A." <Jacqueline_A_Zeiber@omb.eop.gov>

09/08/2006 04:26 PM

To lotero@eac.gov
 cc "Hunt, Alexander T."
 <Alexander_T_Hunt@omb.eop.gov>

Subject
 t

Per our telecon today, you have been set up in a practice site (first e-mail). In order to be granted privileges in the production ROCIS, I need a signed security agreement from you and Juliet and I need you to complete the ROCIS ICR Module Access Privileges Spreadsheet as we discussed and either scan and e-mail the spreadsheet and 2 agreements back to me or fax them to me [REDACTED]

I look forward to our followup conversation next week after you have had a chance to familiarize yourself with ROCIS and have discussed how to proceed with Alex as to revise one of the three past OMB Control Numbers or to start anew.

Jacke Zeiher

202-395-4638[attachment "ROCIS ICR Module Access Privileges Spreadsheet.xls" deleted by Laiza N. Otero/EAC/GOV] [attachment "ROCIS Security Requirements-Revised 6-06.doc" deleted by Laiza N. Otero/EAC/GOV]

009082

**Juliet E.
Thompson-Hodgkins/EAC/G
OV**

07/20/2006 06:28 PM

To Laiza N. Otero/EAC/GOV@EAC

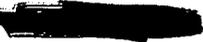
cc

bcc

Subject OMB - OIRA -- that's the office that handles paperwork
reduction act stuff

History:  This message has been replied to.

Alex Hunt is the name of our desk officer. I would suggest calling him and telling him what we have planned and that you wanted to walk through the process with him to assure that we are not leaving anything out.

His number is 

Juliet Thompson Hodgkins
General Counsel
United States Election Assistance Commission
1225 New York Ave., NW, Ste 1100
Washington, DC 20005
(202) 566-3100

009083



Laiza N. Otero/EAC/GOV
09/11/2006 09:48 AM

To Juliet E. Thompson-Hodgkins/EAC/GOV@EAC
cc
bcc
Subject OMB new ROCIS system

Julie,

OMB has a new online system for submitting information collections for review and approval (ROCIS). In order to be granted full access to it, we need you, as the CIO, to sign the attached document (I will also give you a print out of it). I will then forward it to Ms. Zeiher at OMB. Thank you; let me know if you have any questions.

Laiza N. Otero
Research Associate
U.S. Election Assistance Commission
1225 New York Avenue, Suite 1100
Washington, DC 20005
Tel. (202) 566-3100 (main office)
Tel. (202) 566-2209 (direct)
Fax (202) 566-3128

— Forwarded by Laiza N. Otero/EAC/GOV on 09/11/2006 09:45 AM —



"Zeiher, Jacqueline A."
<Jacqueline_A_Zeiher@omb
.eop.gov>
09/08/2006 04:26 PM

To lotero@eac.gov
cc "Hunt, Alexander T." <Alexander_T_Hunt@omb.eop.gov>
Subject

Per our telecon today, you have been set up in a practice site (first e-mail). In order to be granted privileges in the production ROCIS, I need a signed security agreement from you and Juliet and I need you to complete the ROCIS ICR Module Access Privileges Spreadsheet as we discussed and either scan and e-mail the spreadsheet and 2 agreements back to me or fax them to me at 202-395-7245.

I look forward to our followup conversation next week after you have had a chance to familiarize yourself with ROCIS and have discussed how to proceed with Alex as to revise one of the three past OMB Control Numbers or to start anew.

Jacke Zeiher



202-395-4638 ROCIS ICR Module Access Privileges Spreadsheet.xls ROCIS Security Requirements-Revised 6-06.doc

009084

ROCIS Security Requirements for System Users

The RISC/OIRA Consolidated Information System (ROCIS) supports the following informational and review functions:

- Preparation by GSA's Regulatory Information Service Center (RISC) of the semiannual "Unified Agenda of Federal Regulatory and Deregulatory Actions" and the annual "Regulatory Plan," in accordance with Executive Order 12866 and the Regulatory Flexibility Act;
- Review by OMB's Office of Information and Regulatory Affairs (OIRA) of regulatory actions under Executive Order 12866; and
- Review by OIRA of information collections under the Paperwork Reduction Act.

Each of these functions requires entry and updating of information by authorized users acting on behalf of their respective Federal agencies. This document contains the principal security requirements that all users of ROCIS must observe in connection with their use of the system.

Access to ROCIS

Users gain access to ROCIS via an Internet browser. To enter the system, a user must indicate acceptance of the terms of the following warning notice:

"You are about to access a U.S. Government computer system. Access to this system is restricted to authorized users only. Anyone who accesses the system without authorization or in excess of their authorization could be subject to a fine or imprisonment, or both, under Public-Law 98-473. By entering this system, you consent to having your activities and or accesses recorded by the system software and periodically monitored. If this record reveals suspected unauthorized use or criminal activity, the evidence may be provided to supervisory personnel and law enforcement officials. Do NOT process classified information on this system."

Other applicable laws include the Federal Information Security Management Act of 2002 (FISMA), P.L. 107-347, Title III; the Computer Security Act of 1987, P.L. 100-235; OMB Circular A-130, Management of Federal Resources, Appendix III; and the Privacy Act, 5 U.S.C. 552a.

User access will be controlled in accordance with the GSA IT Security Procedural Guide: Access Control CIO-IT Security-01-07. Access will be limited to authorized users as follows:

- All users must receive instruction in the proper use of ROCIS, including ROCIS security instruction, prior to being given access to the system.
- Access to ROCIS will be controlled through the use of user names and passwords and based on privileges granted by the ROCIS System Administrator.
- Each user will be granted access only to the extent needed to support the individual's specified role in relation to the agency's business functions.

- Accounts will be locked after three unsuccessful login attempts. Users will need to contact the help desk to get their accounts unlocked.
- Individuals who no longer have a need for access to ROCIS related to agency business functions, because of termination of employment, reassignment, or any other reason, are prohibited from logging into ROCIS. The individual or the agency should notify the ROCIS System Administrator of any such change in status.
- The ROCIS System Administrator will revoke access privileges for users who intentionally violate ROCIS security policies.
- All users must sign the "Acknowledgment of ROCIS Security Requirements" form attached to this document.

Sensitivity and Confidentiality of Information in the System

ROCIS must not be used to process classified data. However, the data ROCIS will handle are considered sensitive and proprietary because the information relates to decisions and actions that take place during the life cycle of regulations development and information collections approvals. Much of this information is predecisional, and there could be significant ramifications to the missions of RISC, OIRA, and other Federal agencies if the information is disclosed, altered, or misused prior to approved release. Users therefore are prohibited from unauthorized disclosure of predecisional or other deliberative information.

In addition, ROCIS maintains user data containing information about agencies and employees, mailing lists, access privileges, user names and passwords, and user level access assignments, which must be protected.

Some of the information within ROCIS will be published and made available directly to the general public through the Internet. The public will not have access to sensitive or proprietary information in the system.

Rules for Behavior

All authorized governmental and contractor users of ROCIS will be responsible for data protection, including maintaining the confidentiality and integrity of sensitive data from unauthorized or accidental disclosure, misuse, or alteration. Users will be held accountable for their interactions with ROCIS and its data. Compliance with these rules will be enforced through sanctions commensurate with the level of infraction. Actions may include a verbal or written warning, removal of system access for a specific period of time, reassignment to other duties, or termination, depending on the severity of the violation.

General Requirements:

- Users must be familiar with ROCIS security and operational policies and practices and with any corresponding requirements of their agency.
- Users must promptly notify RISC, OIRA and, if appropriate, other Federal agency security personnel of any security incident related to ROCIS.
- Users must attend ROCIS and their agency's security instruction as required.

- Users must maintain an awareness of threats to the ROCIS application, server hardware, or data.
- Users must maintain familiarity with the functionality and proper use of ROCIS.
- ROCIS will track actions of users through audit trails. Individuals will be held accountable for their actions on the system and for any accesses made with their user names and passwords.
- Users must not import data into ROCIS from disks or files created on other systems unless they have first been scanned by an antivirus protection system.

Password Protection:

- Users must not share or otherwise disclose their passwords to other persons.
- Users must change their passwords upon initial access to ROCIS and thereafter every 90 days, or as prompted by the system, in accordance with the specifications for a mix of letters, numbers and special characters.
- Users should select passwords that avoid family names, sports team names, and other predictable keyboard patterns that may easily be guessed.
- Passwords should be memorized. Do not write, display, or store passwords where other persons may access or view them.
- Users should report to the ROCIS System Administrator any requests by others to reveal their passwords.

Use and Protection of Data:

- Users must access ROCIS only through authorized interfaces.
- Users must not attempt to view, change, or delete data, or to perform any other actions in ROCIS, unless authorized to do so.
- Users must control access to their personal computers whenever they are logged into ROCIS. Users should terminate their connections to ROCIS immediately upon completion of their work in the system and whenever their personal computers will be unattended.

Acknowledgment of ROCIS Security Requirements

Please complete this form, sign and date it, and return the form to the ROCIS Security Officer (System Administrator Mike Johnson), acknowledging that you have read the "ROCIS Security Requirements for System Users" and have understood its content.

Name: (Please print) _____

Signature: _____

Date: _____ Agency: _____

Telephone: _____ E-mail Address: _____

If you have any questions about IT security, or about the content of this document, please contact the ROCIS Security Officer at mike.Johnson@gsa.gov or on 202-208-7659. Fax: 202-482-7360.

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AGENCY REQUEST FOR ACCESS PRIVILEGES TO ROCIS ICR MODULE					
	Name	e-mail Address	Office Phone Number	IV. Privileges A, B, C in accordance with table below	Agency Code(s) for which privileges apply
I. Agency Name:					
II. PRA Roles:					
Alternate Rep for ICR Module Access Privileges					
Certifying Official Designee(s)					
Clearance Officer/POC for ROCIS Implementation					
III. PRA Staff Users:					
ICR Reviewing Officials:					
	Directions for completing this spreadsheet:				
	I. Please enter Agency name.				
	II. Please identify the individuals who fill the following roles for your Agency:				
	Alternate responsible for representing and coordinating additions and deletions to Agency ICR Module Access List as personnel changes dictate.				
	Certifying Official certifies that the Agency's information collections comply with 5 CFR 1320.9. Please note that the Clinger-Cohen Act specifies the "senior official" responsible for compliance and certification required by OMB's regulations implementing the Paperwork Reduction Act (5 CFR Part 1320) to be the agency's chief information officer." (See 44 USC 3506.)				
	Designee(s) delegated authority to certify on behalf of the CIO.				
	Clearance Officer in charge of day-to-day Agency PRA process and POC for ROCIS implementation.				
	III. Please list the PRA staff and ICR reviewing officials you wish to have ROCIS ICR Module access.				
	IV. Identify requested privileges A, B, and C below in Column E for each person named in II and III. List all that apply.				
	A. Authority to certify that the ICR complies with 5 CFR 1320.9 and to submit an ICR to OIRA.				
	B. Authority to create and edit (prepare) (but not certify and submit) a PRA Information Collection Request (ICR).				
	C. Authority to view-only the Agency's ICRs and to write short intra-agency review/routing notes to ICRs prior to submission of requests to OIRA. (This authority does not include authority to prepare or submit an ICR.)				
	Some considerations for assigning privileges:				
	Certifying Official and Designee(s) will be granted Privilege A, authority to certify that the ICR complies with 5 CFR 1320.9 and submit an ICR to OIRA. Unless otherwise noted by you, if one is granted Privilege A, the lesser Privileges B and C apply as well.				
	All three of the above privileges include rights to view and download Notices of Action, run reports, and perform searches.				
	ICR preparation privileges (Privilege B) should be limited to your agency's PRA professionals rather than program subject matter content contacts.				
	Privilege C is intended for those individuals who are part of your agency's ICR review process prior to submission to OIRA. Pending and concluded actions will be viewable by program subject matter content contacts at the public website, RegInfo.gov.				
	V. Please E-mail the spreadsheet to Jacqueline A. Zeiher@omb.eop.gov by 12/16/2005. Address questions to Jacke Zeiher at 202-395-4638.				



"Hunt, Alexander T."
<Alexander_T._Hunt@omb.eop.gov>
09/08/2006 12:45 PM

To lotero@eac.gov
cc
bcc
Subject RE: OMB clearance package

History:

This message has been replied to.

Someone from our ROCIS team will be in touch with you.

From: lotero@eac.gov [mailto:lotero@eac.gov]
Sent: Thursday, September 07, 2006 5:37 PM
To: Hunt, Alexander T.
Subject: RE: OMB clearance package

Dear Mr. Hunt,

I am writing to follow up on our last e-mail exchange (see below). The EAC currently has a (60 day) notice in the Federal Register for public comment to end on Sept. 29th regarding its 2006 Election Day survey. I would like more information about the documentation we have to provide to request OMB clearance; you had mentioned there would be an online method for submitting the clearance package.

Also, my colleague Gavin Gilmour, our Deputy General Counsel, mentioned that he spoke to you about emergency processing for an information collection he is working on related to the EAC's Certification Program for election systems. We would like more information about that process as well. We are looking at submitting the document for OMB review and/or Federal Register publication on October 1st for 30 days.

I greatly appreciate your time and assistance, and I look forward to your response. Thank you and have a great day!

Sincerely,

Laiza N. Otero
Research Associate
U.S. Election Assistance Commission
1225 New York Avenue, Suite 1100
Washington, DC 20005
Tel. (202) 566-3100 (main office)
Tel. (202) 566-2209 (direct)
Fax (202) 566-3128

"Hunt, Alexander T." <Alexander_T._Hunt@omb.eop.gov>

07/24/2006 07:11 PM

To lotero@eac.gov
cc
Subject RE: OMB clearance package

009090

We are busy with the ROCIS start-up, but will get back to you with instructions later this week.

Thanks.

From: lotero@eac.gov [mailto:lotero@eac.gov]

Sent: Monday, July 24, 2006 5:24 PM

To: Hunt, Alexander T.

Subject: OMB clearance package

Dear Mr. Hunt,

Per our phone conversation earlier today, I would like to have more information about submitting an information collection request for OMB clearance. The U.S. Election Assistance Commission (EAC) intends to administer a survey later on this year to all 50 States, the District of Columbia, and the U.S. territories to collect election administration and voting data. We are in the process of preparing the document for publication in the Federal Register for the initial 60-day public comment period. Once we do this, it is my understanding that we then submit to OMB the clearance package. I would like to request information as to what exactly is the process, what documents we need to submit, time frames, document formats, etc. Any help or information you can provide on the matter will be greatly appreciated. If you have any questions or need more information, please, do not hesitate to contact me at this address or by phone at the number listed below. Thank you and have a great week!

Sincerely,

Laiza N. Otero
Research Associate
U.S. Election Assistance Commission
1225 New York Avenue, Suite 1100
Washington, DC 20005
Tel. (202) 566-1707
Fax (202) 566-3128

009091



Laiza N. Otero/EAC/GOV
09/21/2006 01:03 PM

To Gavin S. Gilmour/EAC/GOV@EAC, Brian
Hancock/EAC/GOV@EAC
cc
bcc
Subject ROCIS

I have called Jacke Zeiher to request privileges in the production ROCIS (as opposed to the practice site we have access to currently). I will give you all of the necessary information once I receive it from her.
Thank you!

Laiza N. Otero
Research Associate
U.S. Election Assistance Commission
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Washington, DC 20005
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Tel. (202) 566-2209 (direct)
Fax (202) 566-3128

009092



Laiza N. Otero/EAC/GOV
09/21/2006 02:20 PM

To Gavin S. Gilmour/EAC/GOV@EAC, Brian
Hancock/EAC/GOV@EAC

cc

bcc

Subject Fw: Intro to ROCIS for Small Agency

the new password for the practice site is: Ninotchka2/

----- Forwarded by Laiza N. Otero/EAC/GOV on 09/21/2006 02:19 PM -----



"Zeiber, Jacqueline A."
<Jacqueline_A._Zeiber@omb
.eop.gov>
09/08/2006 04:12 PM

To lotero@eac.gov

cc "Hunt, Alexander T." <Alexander_T._Hunt@omb.eop.gov>

Subject RE: Intro to ROCIS for Small Agency

<http://192.136.12.204/rocis/>

user id is lotero
password is rocis123

Then change password and familiarize yourself with the site at your convenience.

Call me when you want to attempt to input the emergency and I'll walk you through.

Jacke Z

From: Hunt, Alexander T.
Sent: Thursday, September 07, 2006 6:04 PM
To: Bushi, Nancy S.; Zeiber, Jacqueline A.
Subject: Intro to ROCIS for Small Agency

This is a small agency with very few collections, and they need help with their first ROCIS submission. Can I give her (?) one of your numbers to help them get started?

Thanks.

From: lotero@eac.gov [mailto:lotero@eac.gov]
Sent: Thursday, September 07, 2006 5:37 PM
To: Hunt, Alexander T.
Subject: RE: OMB clearance package

Dear Mr. Hunt,

I am writing to follow up on our last e-mail exchange (see below). The EAC currently has a (60 day) notice in the Federal Register for public comment to end on Sept. 29th regarding its 2006 Election Day survey. I would like more information about the documentation we have to provide to request OMB

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clearance; you had mentioned there would be an online method for submitting the clearance package.

Also, my colleague Gavin Gilmour, our Deputy General Counsel, mentioned that he spoke to you about emergency processing for an information collection he is working on related to the EAC's Certification Program for election systems. We would like more information about that process as well. We are looking at submitting the document for OMB review and/or Federal Register publication on October 1st for 30 days.

I greatly appreciate your time and assistance, and I look forward to your response. Thank you and have a great day!

Sincerely,

Laiza N. Otero
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Washington, DC 20005
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Tel. (202) 566-2209 (direct)
Fax (202) 566-3128

"Hunt, Alexander T." <Alexander_T._Hunt@omb.eop.gov>

07/24/2006 07:11 PM

To: lotero@eac.gov
cc

Subject: RE: OMB clearance package

We are busy with the ROCIS start-up, but will get back to you with instructions later this week.

Thanks.

From: lotero@eac.gov [mailto:lotero@eac.gov]
Sent: Monday, July 24, 2006 5:24 PM
To: Hunt, Alexander T.
Subject: OMB clearance package

Dear Mr. Hunt,

Per our phone conversation earlier today, I would like to have more information about submitting an

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information collection request for OMB clearance. The U.S. Election Assistance Commission (EAC) intends to administer a survey later on this year to all 50 States, the District of Columbia, and the U.S. territories to collect election administration and voting data. We are in the process of preparing the document for publication in the Federal Register for the initial 60-day public comment period. Once we do this, it is my understanding that we then submit to OMB the clearance package. I would like to request information as to what exactly is the process, what documents we need to submit, time frames, document formats, etc. Any help or information you can provide on the matter will be greatly appreciated. If you have any questions or need more information, please, do not hesitate to contact me at this address or by phone at the number listed below. Thank you and have a great week!

Sincerely,

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U.S. Election Assistance Commission
1225 New York Avenue, Suite 1100
Washington, DC 20005
Tel. (202) 566-1707
Fax (202) 566-3128

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Karen Lynn-Dyson/EAC/GOV
09/27/2006 04:51 PM

To Laiza N. Otero/EAC/GOV@EAC
cc Brian Hancock/EAC/GOV@EAC, Juliet E.
Hodgkins/EAC/GOV@EAC, twilkey@eac.gov
bcc
Subject Re: OMB training 

I think this is an excellent idea.

Most especially in light of the fact that we may have to go through this process at least SIX times in the next year!

Karen Lynn-Dyson
Research Director
U.S. Election Assistance Commission
1225 New York Avenue, NW Suite 1100
Washington, DC 20005
tel:202-566-3123

Laiza N. Otero/EAC/GOV



Laiza N. Otero/EAC/GOV
09/27/2006 04:23 PM

To Karen Lynn-Dyson/EAC/GOV@EAC, Brian
Hancock/EAC/GOV@EAC
cc
Subject OMB training

Hello,

OMB has booked a space for me to attend a training next Tuesday, October 3rd from 10am-12:30pm @ GSA. It's a workshop designed to teach us about their new ROCIS system for submitting information collection requests. There's no cost involved. Is it ok with both of you that I attend? I think the training would be quite useful to say the least --- I am planning on learning that system and the whole clearance process inside/out. Thank you!

Laiza N. Otero
Research Associate
U.S. Election Assistance Commission
1225 New York Avenue, Suite 1100
Washington, DC 20005
Tel. (202) 566-3100 (main office)
Tel. (202) 566-2209 (direct)
Fax (202) 566-3128

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Karen Lynn-Dyson/EAC/GOV

10/05/2006 01:48 PM

To Peter Schulleri/EAC/GOV@EAC, Laiza N.
Otero/EAC/GOV@EAC

cc Juliet E. Hodgkins/EAC/GOV@EAC

bcc

Subject OMB Clearance Conference call Friday 13th at 2:00 PM

Peter-

Assuming Laiza gives you the OK (since she is the primary presenter) for a Friday, October 13th 2:00 conference call, please send out to our four new contractors the following:

"On Friday, October 13 at 2:00 PM EAC staff will conduct a 45-60 minute call on various details and processes related to the Paperwork Reduction Act and the OMB Clearance process. If the EAC research project you are currently operating requires surveying 10 or more persons, you are subject to the rules and regulations of the Paperwork Reduction Act. Most of the EAC 's research contractors will involve surveying more than 10 voters and/or election officials.

We look forward to your participation in this call:

(..... Call-in information) "

Thanks

Karen Lynn-Dyson
Research Director
U.S. Election Assistance Commission
1225 New York Avenue , NW Suite 1100
Washington, DC 20005
tel:202-566-3123

009097



Laiza N. Otero/EAC/GOV

10/06/2006 11:28 AM

To Karen Lynn-Dyson/EAC/GOV@EAC

cc

bcc

Subject PRA

Thought this might be helpful in helping you determine if you need PRA clearance for your focus groups :

In accordance with the PRA, OMB approval must be obtained prior to collecting information in any situation where 10 or more individuals are involved and the questions are standardized in nature.

Do focus groups need Paperwork Reduction Act clearance?

Yes -- assuming that the focus groups are working from predetermined scripts that are being asked each group

Compliance with the PRA is required whenever a federal agency sponsors a data collection by using identical questions, using identical reporting or record-keeping requirements, or asking respondents to provide the same level of information on the same subject involving 10 or more respondents in a 12-month period (7,10). The law applies to all federal employees, contractors, people in cooperative agreements, and anyone else who asks the public for information for the purpose of research, public health practice, program evaluation, or any other reason. The PRA also addresses customer satisfaction inventories, focus group inquiries, all types of surveys, telephone interviews, and electronic environments.

What Doesn't Need PRA Clearance?

Open-ended questions to the public, e.g. "What do you think about this?" in a focus group do not require OMB approval.

Does the PRA affect questions at public meetings ?

Not usually. No clearance is needed if the attendees are just asked to comment or give suggestions on the program or subject in question. If, however, the group is gathered for the purpose of having attendees respond to a specific set of formatted questions, then the PRA does apply

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Laiza N. Otero/EAC/GOV
10/12/2006 02:45 PM

To Karen Lynn-Dyson/EAC/GOV@EAC, Peter
Schulleri/EAC/GOV@EAC

cc

bcc

Subject Materials for tomorrow's conference call

I have provided Karen a copy of the agenda for her to review and provide comments. I am attaching here the other documents that need to be forwarded to the Contractors.



OMB 83-I form.pdf



OMB guidance Sept 2006.pdf



Template for Supporting Statements A and B.doc



OMB Survey Design Guidance 1.2006.pdf

Laiza N. Otero
Research Associate
U.S. Election Assistance Commission
1225 New York Avenue, Suite 1100
Washington, DC 20005
Tel. (202) 566-3100 (main office)
Tel. (202) 566-2209 (direct)
Fax (202) 566-3128

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PAPERWORK REDUCTION ACT SUBMISSION

Please read the instructions before completing this form. For additional forms or assistance in completing this form, contact your agency's Paperwork Clearance Officer. Send two copies of this form, the collection instrument to be reviewed, the Supporting Statement, and any additional documentation to: **Office of Information and Regulatory Affairs, Office of Management and Budget, Docket Library, Room 10102, 725 17th Street NW, Washington, DC 20503.**

<p>1. Agency/Subagency originating request</p>	<p>2. OMB control number b. <input type="checkbox"/> None a. _____</p>
<p>3. Type of information collection (<i>check one</i>)</p> <p>a. <input type="checkbox"/> New collection b. <input type="checkbox"/> Revision of a currently approved collection c. <input type="checkbox"/> Extension, without change, of a currently approved collection d. <input type="checkbox"/> Reinstatement, without change, of a previously approved collection for which approval has expired e. <input type="checkbox"/> Reinstatement, with change, of a previously approved collection for which approval has expired f. <input type="checkbox"/> Existing collection in use without an OMB control number</p>	<p>4. Type of review requested (<i>check one</i>)</p> <p>a. <input type="checkbox"/> Regular b. <input type="checkbox"/> Emergency - Approval requested by: ____/____/____ c. <input type="checkbox"/> Delegated</p>
<p>3a. Public Comments Has the agency received public comments on this information collection? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>5. Small entities Will this information collection have a significant economic impact on a substantial number of small entities? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>6. Requested expiration date a. <input type="checkbox"/> Three years from approval date b. <input type="checkbox"/> Other Specify: ____/____/____</p>	
<p>7. Title</p>	
<p>8. Agency form number(s) (<i>if applicable</i>)</p>	
<p>9. Keywords</p>	
<p>10. Abstract</p>	
<p>11. Affected public (<i>Mark primary with "P" and all others that apply with "X"</i>)</p> <p>a. <input type="checkbox"/> Individuals or households d. <input type="checkbox"/> Farms b. <input type="checkbox"/> Business or other for-profit e. <input type="checkbox"/> Federal Government c. <input type="checkbox"/> Not-for-profit institutions f. <input type="checkbox"/> State, Local or Tribal Government</p>	<p>12. Obligation to respond (<i>Mark primary with "P" and all others that apply with "X"</i>)</p> <p>a. <input type="checkbox"/> Voluntary b. <input type="checkbox"/> Required to obtain or retain benefits c. <input type="checkbox"/> Mandatory</p>
<p>13. Annual reporting and recordkeeping hour burden</p> <p>a. Number of respondents _____ b. Total annual responses _____ 1. Percentage of these responses collected electronically _____ % c. Total annual hours requested _____ d. Current OMB inventory _____ e. Difference _____ f. Explanation of difference 1. Program change _____ 2. Adjustment _____</p>	<p>14. Annual reporting and recordkeeping cost burden (<i>in thousands of dollars</i>)</p> <p>a. Total annualized capital/startup costs _____ b. Total annual costs (O&M) _____ c. Total annualized cost requested _____ d. Current OMB inventory _____ e. Difference _____ f. Explanation of difference 1. Program change _____ 2. Adjustment _____</p>
<p>15. Purpose of information collection (<i>Mark primary with "P" and all others that apply with "X"</i>)</p> <p>a. <input type="checkbox"/> Application for benefits e. <input type="checkbox"/> Program planning or management b. <input type="checkbox"/> Program evaluation f. <input type="checkbox"/> Research c. <input type="checkbox"/> General purpose statistics g. <input type="checkbox"/> Regulatory or compliance d. <input type="checkbox"/> Audit</p>	<p>16. Frequency of recordkeeping or reporting (<i>check all that apply</i>)</p> <p>a. <input type="checkbox"/> Recordkeeping b. <input type="checkbox"/> Third party disclosure c. <input type="checkbox"/> Reporting 1. <input type="checkbox"/> On occasion 2. <input type="checkbox"/> Weekly 3. <input type="checkbox"/> Monthly 4. <input type="checkbox"/> Quarterly 5. <input type="checkbox"/> Semi-annually 6. <input type="checkbox"/> Annually 7. <input type="checkbox"/> Biennially 8. <input type="checkbox"/> Other (describe) _____</p>
<p>17. Statistical methods Does this information collection employ statistical methods? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>18. Agency contact (<i>person who can best answer questions regarding the content of this submission</i>)</p> <p>Name: _____ Phone: _____</p>

19. Certification for Paperwork Reduction Act Submissions

On behalf of this Federal agency, I certify that the collection of information encompassed by this request complies with 5 CFR 1320.9.

Note: The text of 5 CFR 1320.9, and the related provisions of 5 CFR 1320.8(b)(3), appear at the end of the instructions. *The certification is to be made with reference to those regulatory provisions as set forth in the instructions.*

The following is a summary of the topics, regarding the proposed collection of information, that the certification covers:

- (a) It is necessary for the proper performance of agency functions;
- (b) It avoids unnecessary duplication;
- (c) It reduces burden on small entities;
- (d) It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
- (e) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- (f) It indicates the retention period for recordkeeping requirements;
- (g) It informs respondents of the information called for under 5 CFR 1320.8(b)(3):
 - (i) Why the information is being collected;
 - (ii) Use of information;
 - (iii) Burden estimate;
 - (iv) Nature of response (voluntary, required for a benefit, or mandatory);
 - (v) Nature and extent of confidentiality; and
 - (vi) Need to display currently valid OMB control number;
- (h) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to be collected (see note in Item 19 of the instructions);
- (i) It uses effective and efficient statistical survey methodology; and
- (j) It makes appropriate use of information technology.

If you are unable to certify compliance with any of these provisions, identify the item below and explain the reason in Item 18 of the Supporting Statement.

Signature of Senior Official or designee

Date

Instructions For Completing OMB Form 83-I

Please answer all questions and have the Senior Official or designee sign the form. These instructions should be used in conjunction with 5 CFR 1320, which provides information on coverage, definitions, and other matters of procedure and interpretation under the Paperwork Reduction Act of 1995.

1. Agency/Subagency originating request

Provide the name of the agency or subagency originating the request. For most cabinet-level agencies, a subagency designation is also necessary. For non-cabinet agencies, the subagency designation is generally unnecessary.

2. OMB control number

- If the information collection in this request has previously received or now has an OMB control or comment number, enter the number.
- Check "None" if the information collection in this request has not previously received an OMB control number. Enter the four digit agency code for your agency.

3. Type of information collection (check one)

- Check "New collection" when the collection has not previously been used or sponsored by the agency.
- Check "Revision" when the collection is currently approved by OMB, and the agency request includes a material change to the collection instrument, instructions, its frequency of collection, or the use to which the information is to be put.
- Check "Extension" when the collection is currently approved by OMB, and the agency wishes only to extend the approval past the current expiration date without making any material change in the collection instrument, instructions, frequency of collection, or the use to which the information is to be put.
- Check "Reinstatement without change" when the collection previously had OMB approval, but the approval has expired or was withdrawn before this submission was made, and there is no change to the collection.
- Check "Reinstatement with change" when the collection previously had OMB approval, but the approval has expired or was withdrawn before this submission was made, and there is change to the collection.
- Check "Existing collection in use without OMB control number" when the collection is currently in use but does not have a currently valid OMB control number.

4. Type of review requested (check one)

- Check "Regular" when the collection is submitted under 5 CFR 1320.10, 1320.11, or 1320.12 with a standard 60 day review schedule.
- Check "Emergency" when the agency is submitting the request under 5 CFR 1320.13 for emergency processing and provides the required supporting material. Provide the date by which the agency requests approval.
- Check "Delegated" when the agency is submitting the collection under the conditions OMB has granted the agency delegated authority.

5. Small entities

Indicate whether this information collection will have a significant impact on a substantial number of small entities. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.

6. Requested expiration date

- Check "Three years" if the agency requests a three year approval for the collection.
- Check "Other" if the agency requests approval for less than three years: Specify the month and year of the requested expiration date.

7. Title

Provide the official title of the information collection. If an official title does not exist, provide a description which will distinguish this collection from others.

8. Agency form number(s) (if applicable)

Provide any form number the agency has assigned to this collection of information. Separate each form number with a comma.

9. Keywords

Select and list at least two keywords (descriptors) from the "Federal Register Thesaurus of Indexing Terms" that describe the subject area(s) of the information collection. Other terms may be used but should be listed after those selected from the thesaurus. Separate keywords with commas. Keywords should not exceed two lines of text.

10. Abstract

Provide a statement, limited to five lines of text, covering the agency's need for the information, uses to which it will be put, and a brief description of the respondents.

11. Affected public

Mark all categories that apply, denoting the primary public with a "P" and all others that apply with "X."

12. Obligation to respond

Mark all categories that apply, denoting the primary obligation with a "P" and all others that apply with "X."

- Mark "Voluntary" when the response is entirely discretionary and has no direct effect on any benefit or privilege for the respondent.
- Mark "Required to obtain or retain benefits" when the response is elective, but is required to obtain or retain a benefit.
- Mark "Mandatory" when the respondent must reply or face civil or criminal sanctions.

13. Annual reporting and recordkeeping hour burden

- Enter the number of respondents and/or recordkeepers. If a respondent is also a recordkeeper, report the respondent only once.
- Enter the number of responses provided annually. For recordkeeping as compared to reporting activity, the number of responses equals the number of recordkeepers.
 - Enter the estimated percentage of responses that will be submitted/collected electronically using magnetic media (i.e., diskette), electronic mail, or electronic data interchange. Facsimile is **not** considered an electronic submission.
 - Enter the total annual recordkeeping and reporting hour burden.
 - Enter the burden hours currently approved by OMB for this collection of information. Enter zero (0) for any new submission or for any collection whose OMB approval has expired.
 - Enter the difference by subtracting line d from line c. Record a negative number (d larger than c) within parentheses.
 - Explain the difference. The difference in line e must be accounted for in lines f.1. and f.2.
 - "Program change" is the result of deliberate Federal government action. All new collections and any subsequent revision of existing collections (e.g., the addition or deletion of questions) are recorded as program changes.
 - "Adjustment" is a change that is not the result of a deliberate Federal government action. Changes resulting from new estimates or action not controllable by the Federal government are recorded as adjustments.

14. Annual reporting and recordkeeping cost burden (in thousands of dollars)

The costs identified in this item must exclude the cost of hour burden identified in Item 13.

- Enter the total dollar amount of annualized cost for all respondents of any associated capital or start-up costs.
- Enter recurring annual dollar amount of cost for all respondents associated with operating or maintaining systems or purchasing services.
- Enter total (14.a. + 14.b.) annual reporting and recordkeeping cost burden.
- Enter any cost burden currently approved by OMB for this collection of information. Enter zero (0) if this is the first submission after October 1, 1995.
- Enter the difference by subtracting line d from line c. Record a negative number (d larger than c) within parenthesis.
- Explain the difference. The difference in line e must be accounted for in lines f.1. and f.2.
 - "Program change" is the result of deliberate Federal government action. All new collections and any subsequent revisions or changes resulting in cost changes are recorded as program changes.

f.2. "Adjustment" is a change that is not the result of a deliberate Federal government action. Changes resulting from new estimations or actions not controllable by the Federal government are recorded as adjustments.

15. Purpose of information collection

Mark all categories that apply, denoting the primary purpose with a "P" and all others that apply with "X."

a. Mark "Application for benefits" when the purpose is to participate in, receive, or qualify for a grant, financial assistance, etc., from a Federal agency or program.

b. Mark "Program evaluation" when the purpose is a formal assessment, through objective measures and systematic analysis, of the manner and extent to which Federal programs achieve their objectives or produce other significant effects.

c. Mark "General purpose statistics" when the data is collected chiefly for use by the public or for general government use without primary reference to the policy or program operations of the agency collecting the data.

d. Mark "Audit" when the purpose is to verify the accuracy of accounts and records.

e. Mark "Program planning or management" when the purpose relates to progress reporting, financial reporting and grants management, procurement and quality control, or other administrative information that does not fit into any other category.

f. Mark "Research" when the purpose is to further the course of research, rather than for a specific program purpose.

g. Mark "Regulatory or compliance" when the purpose is to measure compliance with laws or regulations.

16. Frequency of recordkeeping or reporting

Check "Recordkeeping" if the collection of information explicitly includes a recordkeeping requirement.

Check "Third party disclosure" if a collection of information includes third-party disclosure requirements as defined by 1320.3(c).

Check "Reporting" for information collections that involve reporting and check the frequency of reporting that is requested or required of a respondent. If the reporting is on "an event" basis, check "On occasion."

17. Statistical methods

Check "Yes" if the information collection uses statistical methods such as sampling or imputation. Generally, check "No" for applications and audits (unless a random auditing scheme is used). Check "Yes" for statistical collections, most research collections, and program evaluations using scientific methods. For other types of data collection, the use of sampling, imputation, or other statistical estimation techniques should dictate the response for this item. Ensure that supporting documentation is provided in accordance with Section B of the Supporting Statement.

18. Agency contact

Provide the name and telephone number of the agency person best able to answer questions regarding the content of this submission.

19. Certification for Paperwork Reduction Act Submissions

The Senior Official or designee signing this statement certifies that the collection of information encompassed by the request complies with 5 CFR 1320.9. Provisions of this certification that the agency cannot comply with should be identified here and fully explained in item 18 of the attached Supporting Statement. NOTE: The Office that "develops" and "uses" the information to be collected is the office that "conducts or sponsors" the collection of information. (See 5 CFR 1320.3(d)).

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Certification Requirement for Paperwork Reduction Act Submissions

5 CFR 1320.9 reads "As part of the agency submission to OMB of a proposed collection of information, the agency (through the head of the agency, the Senior Official, or their designee) shall certify (and provide a record supporting such certification) that the proposed collection of information—

"(a) is necessary for the proper performance of the functions of the agency, including that the information to be collected will have practical utility;

"(b) is not unnecessarily duplicative of information otherwise reasonably accessible to the agency;

"(c) reduces to the extent practicable and appropriate the burden on persons who shall provide information to or for the agency, including with respect to small entities, as defined in the Regulatory Flexibility Act (5 U.S.C. § 601(6)), the use of such techniques as:

"(1) establishing differing compliance or reporting requirements or timetables that take into account the resources available to those who are to respond;

"(2) the clarification, consolidation, or simplification of compliance and reporting requirements; or collections of information, or any part thereof;

"(3) an exemption from coverage of the collection of information, or any part thereof;

"(d) is written using plain, coherent, and unambiguous terminology and is understandable to those who are to respond;

"(e) is to be implemented in ways consistent and compatible, to the maximum extent practicable, with the existing reporting and recordkeeping practices of those who are to respond;

"(f) indicates for each recordkeeping requirement the length of time persons are required to maintain the records specified;

"(g) informs potential respondents of the information called for under §1320.8(b)(3); [see below]

"(h) has been developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to be collected, including the processing of the information in a manner which shall enhance, where appropriate, the utility of the information to agencies and the public;

"(i) uses effective and efficient statistical survey methodology appropriate to the purpose for which the information is to be collected; and

"(j) to the maximum extent practicable, uses appropriate information technology to reduce burden and improve data quality, agency efficiency and responsiveness to the public."

NOTE: 5 CFR 1320.8(b)(3) requires that each collection of information:

"(3) informs and provides reasonable notice to the potential persons to whom the collection of information is addressed of:

"(i) the reasons the information is planned to be and/or has been collected;

"(ii) the way such information is planned to be and/or has been used to further the proper performance of the functions of the agency;

"(iii) an estimate, to the extent practicable, of the average burden of the collection (together with a request that the public direct to the agency any comments concerning the accuracy of this burden estimate and any suggestions for reducing this burden);

"(iv) whether responses to the collection of information are voluntary, require to obtain or retain a benefit (citing authority) or mandatory (citing authority);

"(v) the nature and extent of confidentiality to be provided, if any (citing authority); and

"(vi) the fact that an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number."

Supporting Statement for Paperwork Reduction Act Submissions

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 of the OMB Form 83-I is checked "Yes", Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

A. 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.

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.

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.

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 Item 2 above.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

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.

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;
- * requiring 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;

* requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax 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;

* requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

* 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

* requiring respondents to submit proprietary trade secrets, 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.

8. If applicable, provide a copy and identify the date and page number of publication 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.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

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.

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

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and 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.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- * 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 in Item 13 of OMB Form 83-I.

* 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 in Item 13.

13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

* The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

* If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use

existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

* Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

14. Provide estimates of annualized costs 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. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

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.

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.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

B. Collections of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the Form OMB 83-I is checked, "Yes," the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

2. Describe the procedures for the collection of information including:

- * Statistical methodology for stratification and sample selection,
- * Estimation procedure,
- * Degree of accuracy needed for the purpose described in the justification,
- * Unusual problems requiring specialized sampling procedures, and
- * Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of test may be submitted for approval separately or in combination with the main collection of information.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

OFFICE OF MANAGEMENT AND BUDGET
STANDARDS AND GUIDELINES FOR STATISTICAL SURVEYS

September 2006

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LIST OF STANDARDS FOR STATISTICAL SURVEYS

SECTION 1 DEVELOPMENT OF CONCEPTS, METHODS, AND DESIGN

Survey Planning

Standard 1.1: Agencies initiating a new survey or major revision of an existing survey must develop a written plan that sets forth a justification, including: goals and objectives; potential users; the decisions the survey is designed to inform; key survey estimates; the precision required of the estimates (e.g., the size of differences that need to be detected); the tabulations and analytic results that will inform decisions and other uses; related and previous surveys; steps taken to prevent unnecessary duplication with other sources of information; when and how frequently users need the data; and the level of detail needed in tabulations, confidential microdata, and public-use data files.

Survey Design

Standard 1.2: Agencies must develop a survey design, including defining the target population, designing the sampling plan, specifying the data collection instrument and methods, developing a realistic timetable and cost estimate, and selecting samples using generally accepted statistical methods (e.g., probabilistic methods that can provide estimates of sampling error). Any use of nonprobability sampling methods (e.g., cut-off or model-based samples) must be justified statistically and be able to measure estimation error. The size and design of the sample must reflect the level of detail needed in tabulations and other data products, and the precision required of key estimates. Documentation of each of these activities and resulting decisions must be maintained in the project files for use in documentation (see Standards 7.3 and 7.4).

Survey Response Rates

Standard 1.3: Agencies must design the survey to achieve the highest practical rates of response, commensurate with the importance of survey uses, respondent burden, and data collection costs, to ensure that survey results are representative of the target population so that they can be used with confidence to inform decisions. Nonresponse bias analyses must be conducted when unit or item response rates or other factors suggest the potential for bias to occur.

Pretesting Survey Systems

Standard 1.4: Agencies must ensure that all components of a survey function as intended when implemented in the full-scale survey and that measurement error is controlled by conducting a pretest of the survey components or by having successfully fielded the survey components on a previous occasion.

SECTION 2 COLLECTION OF DATA

Developing Sampling Frames

Standard 2.1: Agencies must ensure that the frames for the planned sample survey or census are appropriate for the study design and are evaluated against the target population for quality.

Required Notifications to Potential Survey Respondents

Standard 2.2: Agencies must ensure that each collection of information instrument clearly states the reasons the information is planned to be collected; the way such information is planned to be used to further the proper performance of the functions of the agency; whether responses to the collection of information are voluntary or mandatory (citing authority); the nature and extent of confidentiality to be provided, if any, citing authority; an estimate of the average respondent burden together with a request that the public direct to the agency any comments concerning the accuracy of this burden estimate and any suggestions for reducing this burden; the OMB control number; and a statement that an agency may not conduct and a person is not required to respond to an information collection request unless it displays a currently valid OMB control number.

Data Collection Methodology

Standard 2.3: Agencies must design and administer their data collection instruments and methods in a manner that achieves the best balance between maximizing data quality and controlling measurement error while minimizing respondent burden and cost.

SECTION 3 PROCESSING AND EDITING OF DATA

Data Editing

Standard 3.1: Agencies must edit data appropriately, based on available information, to mitigate or correct detectable errors.

Nonresponse Analysis and Response Rate Calculation

Standard 3.2: Agencies must appropriately measure, adjust for, report, and analyze unit and item nonresponse to assess their effects on data quality and to inform users. Response rates must be computed using standard formulas to measure the proportion of the eligible sample that is represented by the responding units in each study, as an indicator of potential nonresponse bias.

Coding

Standard 3.3: Agencies must add codes to collected data to identify aspects of data quality from the collection (e.g., missing data) in order to allow users to appropriately analyze the data. Codes added to convert information collected as text into a form that permits immediate analysis must use standardized codes, when available, to enhance comparability.

Data Protection

Standard 3.4: Agencies must implement safeguards throughout the production process to ensure that survey data are handled to avoid disclosure.

Evaluation

Standard 3.5: Agencies must evaluate the quality of the data and make the evaluation public (through technical notes and documentation included in reports of results or through a separate report) to allow users to interpret results of analyses, and to help designers of recurring surveys focus improvement efforts.

SECTION 4 PRODUCTION OF ESTIMATES AND PROJECTIONS

Developing Estimates and Projections

Standard 4.1: Agencies must use accepted theory and methods when deriving direct survey-based estimates, as well as model-based estimates and projections that use survey data. Error estimates must be calculated and disseminated to support assessment of the appropriateness of the uses of the estimates or projections. Agencies must plan and implement evaluations to assess the quality of the estimates and projections.

SECTION 5 DATA ANALYSIS

Analysis and Report Planning

Standard 5.1: Agencies must develop a plan for the analysis of survey data prior to the start of a specific analysis to ensure that statistical tests are used appropriately and that adequate resources are available to complete the analysis.

Inference and Comparisons

Standard 5.2: Agencies must base statements of comparisons and other statistical conclusions derived from survey data on acceptable statistical practice.

SECTION 6 REVIEW PROCEDURES

Review of Information Products

Standard 6.1: Agencies are responsible for the quality of information that they disseminate and must institute appropriate content/subject matter, statistical, and methodological review procedures to comply with OMB and agency Information Quality Guidelines.

SECTION 7 DISSEMINATION OF INFORMATION PRODUCTS

Releasing Information

Standard 7.1: Agencies must release information intended for the general public according to a dissemination plan that provides for equivalent, timely access to all users and provides information to the public about the agencies' dissemination policies and procedures including those related to any planned or unanticipated data revisions.

Data Protection and Disclosure Avoidance for Dissemination

Standard 7.2: When releasing information products, agencies must ensure strict compliance with any confidentiality pledge to the respondents and all applicable Federal legislation and regulations.

Survey Documentation

Standard 7.3: Agencies must produce survey documentation that includes those materials necessary to understand how to properly analyze data from each survey, as well as the information necessary to replicate and evaluate each survey's results (See also Standard 1.2). Survey documentation must be readily accessible to users, unless it is necessary to restrict access to protect confidentiality.

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Documentation and Release of Public-Use Microdata

Standard 7.4: Agencies that release microdata to the public must include documentation clearly describing how the information is constructed and provide the metadata necessary for users to access and manipulate the data (See also Standard 1.2). Public-use microdata documentation and metadata must be readily accessible to users.

INTRODUCTION

This document provides 20 standards that apply to Federal censuses and surveys whose statistical purposes include the description, estimation, or analysis of the characteristics of groups, segments, activities, or geographic areas in any biological, demographic, economic, environmental, natural resource, physical, social, or other sphere of interest. The development, implementation, or maintenance of methods, technical or administrative procedures, or information resources that support such purposes are also covered by these standards. In addition, these standards apply to censuses and surveys that are used in research studies or program evaluations if the purpose of the survey meets any of the statistical purposes noted above. To the extent they are applicable, these standards also cover the compilation of statistics based on information collected from individuals or firms (such as tax returns or the financial and operating reports required by regulatory commissions), applications/registrations, or other administrative records.

Background

Standards for Federal statistical programs serve both the interests of the public and the needs of the government. These standards document the professional principles and practices that Federal agencies are required to adhere to and the level of quality and effort expected in all statistical activities. Each standard has accompanying guidelines that present recommended best practices to fulfill the goals of the standards. Taken together, these standards and guidelines provide a means to ensure consistency among and within statistical activities conducted across the Federal Government. Agency implementation of standards and guidelines ensures that users of Federal statistical information products are provided with details on the principles and methods employed in the development, collection, processing, analysis, dissemination, and preservation of Federal statistical information.

In 2002, the U.S. Office of Management and Budget (OMB), in response to Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554), popularly known as the Information Quality Act, issued government-wide guidelines that “provide policy and procedural guidance to Federal agencies for ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by Federal agencies” (67 FR 8452-8460; February 22, 2002). Federal statistical agencies worked together to draft a common framework to use in developing their individual Information Quality Guidelines. That framework, published in the June 4, 2002, *Federal Register* Notice, “Federal Statistical Organizations’ Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Disseminated Information” (67 FR 38467-38470), serves as the organizing framework for the standards and guidelines presented here.¹ The framework for these standards and guidelines includes:

¹ The *Federal Register* notice included eight areas where statistical organizations set standards for performance. The framework utilized here combines “Development of concepts and methods” with “Planning and design of surveys and other means of collecting data” into the single section on “Development of concepts, methods, and design.” The standards for these activities were closely linked and attempting to separate them into two distinct sections would have resulted in some duplication of standards between sections. The only other change is the title of Section 7, which was shortened to “Dissemination of Information Products” for convenience rather than “Dissemination of data by published reports, electronic files, and other media requested by users” as it originally appeared in the *Federal Register* notice.

- Development of concepts, methods, and design
- Collection of data
- Processing and editing of data
- Production of estimates and projections
- Data analysis
- Review procedures
- Dissemination of Information Products.

Within this framework, the 20 standards and their related guidelines for Federal statistical surveys focus on ensuring high quality statistical surveys that result in information products satisfying an agency's and OMB's Information Quality Guidelines' requirements for ensuring and maximizing the quality, objectivity, utility, and integrity of information disseminated by the Federal Government.

The standards and guidelines are not intended to substitute for the extensive existing literature on statistical and survey theory, methods, and operations. When undertaking a survey, an agency should engage knowledgeable and experienced survey practitioners to effectively achieve the goals of the standards. Persons involved should have knowledge and experience in survey sampling theory, survey design and methodology, field operations, data analysis, and dissemination as well as technological aspects of surveys.

Under the OMB Information Quality Guidelines, quality is an encompassing term comprising objectivity, utility, and integrity.

Objectivity refers to whether information is accurate, reliable, and unbiased, and is presented in an accurate, clear, and unbiased manner. It involves both the content of the information and the presentation of the information. This includes complete, accurate, and easily understood documentation of the sources of the information, with a description of the sources of any errors that may affect the quality of the data, when appropriate. Objectivity is achieved by using reliable information sources and appropriate techniques to prepare information products.

Standards related to the production of accurate, reliable, and unbiased information include Survey Response Rates (1.3), Developing Sampling Frames (2.1), Required Notifications to Potential Survey Respondents (2.2), Data Collection Methodology (2.3), Data Editing (3.1), Nonresponse Analysis and Response Rate Calculation (3.2), Coding (3.3), Evaluation (3.5), Developing Estimates and Projections (4.1), Analysis and Report Planning (5.1), and Inference and Comparisons (5.2).

Standards related to presenting results in an accurate, clear, and unbiased manner include: Review of Information Products (6.1), Survey Documentation (7.3), and Documentation and Release of Public-Use Microdata (7.4).

Utility refers to the usefulness of the information that is disseminated to its intended users. The usefulness of information disseminated by Federal agencies should be considered from the perspective of specific subject matter users, researchers, policymakers, and the public. Utility is

achieved by continual assessment of information needs, anticipating emerging requirements, and developing new products and services.

To ensure that information disseminated by Federal agencies meets the needs of the intended users, agencies rely upon internal reviews, analyses, and evaluations along with feedback from advisory committees, researchers, policymakers, and the public. In addition, agencies should clearly and correctly present all information products in plain language geared to their intended audiences. The target audience for each product should be clearly identified, and the product's contents should be readily accessible to that audience.

In all cases, the goal is to maximize the usefulness of information and minimize the costs to the government and the public. When disseminating their information products, Federal agencies should utilize a variety of efficient dissemination channels so that the public, researchers, and policymakers can locate and use information in an equitable, timely, and cost-effective fashion.

The specific standards that contribute directly to the utility and the dissemination of information include: Survey Planning (1.1), Survey Design (1.2), Pretesting Survey Systems (1.4), Review of Information Products (6.1), Releasing Information (7.1), Survey Documentation (7.3), and Documentation and Release of Public-Use Microdata (7.4).

Integrity refers to the security or protection of information from unauthorized access or revision. Integrity ensures that the information is not compromised through corruption or falsification.

Federal agencies have a number of statutory and administrative provisions governing the protection of information. Examples that may affect all Federal agencies include the Privacy Act; the Freedom of Information Act; the Confidential Information Protection and Statistical Efficiency Act of 2002; the Federal Information Security Management Act of 2002; the Health Insurance Portability and Accountability Act of 1996; OMB Circular Nos. A-123, A-127, and A-130; and the Federal Policy for the Protection of Human Subjects. The standards on Required Notifications to Potential Survey Respondents (2.2), Data Protection (3.4), and Data Protection and Disclosure Avoidance for Dissemination (7.2) directly address statistical issues concerning the integrity of data.

Requirements for Agencies

The application of standards to the wide range of Federal statistical activities and uses requires judgment that balances such factors as the uses of the resulting information and the efficient allocation of resources; this should not be a mechanical process. Some surveys are extremely large undertakings requiring millions of dollars, and the resulting general-purpose statistics have significant, far-reaching effects. (Examples of major Federal information programs, many based on statistical surveys, are the Principal Federal Economic Indicators.²) Other statistical activities may be more limited and focused on specific program areas (e.g., customer satisfaction surveys, program evaluations, or research).

² For the list of principal economic indicators and their release dates see <http://www.whitehouse.gov/omb/infoereg/statpolicy.html#sr>

For each statistical survey in existence when these standards are issued and for each new survey, the sponsoring and/or releasing agency should evaluate compliance with applicable standards. The agency should establish compliance goals for applicable standards if a survey is not in compliance. An agency should use major survey revisions or other significant survey events as opportunities to address areas in which a survey is not in compliance with applicable standards.

Federal agencies are required to adhere to all standards for every statistical survey, even those that have already received OMB approval. Agencies should provide sufficient information in their Information Collection Requests (ICR) to OMB under the Paperwork Reduction Act (PRA) to demonstrate whether they are meeting the standards. OMB recognizes that these standards cannot be applied uniformly or precisely in every situation. Consideration will be given to the importance of the uses of the information as well as the quality required to support those uses. If funding or other contingencies make it infeasible for all standards to be met, agencies should discuss in their ICR submissions the options that were considered and why the final design was selected.

The agency should also include in the standard documentation for the survey, or in an easily accessible public venue, such as on its web site, the reasons why the standard could not be met and what actions the agency has taken or will take to address any resulting issues.³

The following standards and guidelines are not designed to be completely exhaustive of all efforts that an agency may undertake to ensure the quality of its statistical information. Agencies are encouraged to develop additional, more detailed standards focused on their specific statistical activities.

The standards are presented in seven sections. For each standard, there is a list of key terms that are used in the standard or accompanying guidelines, and these terms are defined in the appendix to provide clarification on their use in this document. The guidelines for each standard represent best practices that may be useful in fulfilling the goals of the standard and provide greater specificity and detail than the standards. However, as noted earlier, these standards and guidelines are not intended to substitute for the extensive existing literature on statistical and survey theory, methods, and operations. Additional information relevant to the standards can be found in other more specialized publications, and references to other Federal guidance documents or resources and the work of the Federal Committee on Statistical Methodology are provided in this document.

Agencies conducting surveys should also consult guidance issued by OMB entitled *Questions and Answers When Designing Surveys for Information Collections*. That document was developed by OMB to assist agencies in preparing their Information Collection Requests for OMB review under the Paperwork Reduction Act (PRA). The PRA requires that all Federal agencies obtain approval from OMB prior to collecting information from ten or more persons.⁴

³ In cases where the agency determines that ongoing surveys are not in compliance with the standards, the documentation should be updated at the earliest possible time.

⁴ Under the PRA, "Person means an individual, partnership, association, corporation (including operations of government-owned contractor-operated facilities), business trust, or legal representative, an organized group of

SECTION 1 DEVELOPMENT OF CONCEPTS, METHODS, AND DESIGN

Section 1.1 Survey Planning

Standard 1.1: Agencies initiating a new survey or major revision of an existing survey must develop a written plan that sets forth a justification, including: goals and objectives; potential users; the decisions the survey is designed to inform; key survey estimates; the precision required of the estimates (e.g., the size of differences that need to be detected); the tabulations and analytic results that will inform decisions and other uses; related and previous surveys; steps taken to prevent unnecessary duplication with other sources of information; when and how frequently users need the data; and the level of detail needed in tabulations, confidential microdata, and public-use data files.

Key Terms: bridge study, confidentiality, consistent data series, crosswalk study, data series, effect size, individually-identifiable data, key variables, measurement error, microdata, minimum substantively significant effect (MSSE), pretest, public-use data file, respondent burden, survey system

The following guidelines represent best practices that may be useful in fulfilling the goals of the standard:

Guideline 1.1.1: Surveys (and related activities such as focus groups, cognitive interviews, pilot studies, field tests, etc.) are collections of information subject to the requirements of the Paperwork Reduction Act of 1995 (Pub.L. No. 104-13, 44 U.S.C. § 3501 et seq.) and OMB's implementing regulations (5 C.F.R. § 1320, Controlling Paperwork Burdens on the Public). An initial step in planning a new survey or a revision of an existing survey should be to contact the sponsoring agency's Chief Information Officer or other designated official to ensure the survey work is done in compliance with the law and regulations. OMB approval will be required before the agency may collect information from 10 or more members of the public in a 12-month period. A useful reference document regarding the approval process is OMB's *Questions and Answers When Designing Surveys for Information Collections*.

Guideline 1.1.2: Planning is an important prerequisite when designing a new survey or survey system, or implementing a major revision of an ongoing survey. Key planning and project management activities include the following:

1. A justification for the survey, including the rationale for the survey, relationship to prior surveys, survey goals and objectives (including priorities within these goals and objectives), hypotheses to be tested, and definitions of key variables. Consultations with potential users to identify their requirements and expectations are also important at this stage of the planning process.
2. A review of related studies, surveys, and reports of Federal and non-Federal sources to ensure that part or all of the survey would not unnecessarily duplicate available data from an existing

individuals, a State, territorial, tribal, or local government or branch thereof, or a political subdivision of a State, territory, tribal, or local government or a branch of a political subdivision" (5 C.F.R. § 1320.3(k)).

source, or could not be more appropriately obtained by adding questions to existing Federal statistical surveys. The goal here is to spend Federal funds effectively and minimize respondent burden. If a new survey is needed, efforts to minimize the burden on individual respondents are important in the development and selection of items.

3. A review of the confidentiality and privacy provisions of the Privacy Act, the Confidential Information Protection and Statistical Efficiency Act of 2002, and the privacy provisions of the E-Government Act of 2002, and all other relevant laws, regulations, and guidance, when planning any surveys that will collect individually-identifiable data from any survey participant.
4. A review of all survey data items, the justification for each item, and how each item can best be measured (e.g., through questionnaires, tests, or administrative records). Agencies should assemble reasonable evidence that these items are valid and can be measured both accurately and reliably, or develop a plan for testing these items to assess their accuracy and reliability.
5. A plan for pretesting the survey or survey system, if applicable (see Section 1.4).
6. A plan for quality assurance during each phase of the survey process to permit monitoring and assessing performance during implementation. The plan should include contingencies to modify the survey procedures if design parameters appear unlikely to meet expectations (for example, if low response rates are likely). The plan should also contain general specifications for an internal project management system that identifies critical activities and key milestones of the survey that will be monitored, and the time relationships among them.
7. A plan for evaluating survey procedures, results, and measurement error (see Section 3.5).
8. An analysis plan that identifies analysis issues, objectives, key variables, minimum substantively significant effect sizes, and proposed statistical tests (see Section 5.1).
9. An estimate of resources and target completion dates needed for the survey cycle.
10. A dissemination plan that identifies target audiences, proposed major information products, and the timing of their release.
11. A data management plan for the preservation of survey data, documentation, and information products as well as the authorized disposition of survey records.

Guideline 1.1.3: To maintain a consistent data series over time, use consistent data collection procedures for ongoing data collections. Continuous improvement efforts sometimes result in a trade-off between the desire for consistency and a need to improve a data collection. If changes are needed in key variables or survey procedures for a data series, consider the justification or rationale for the changes in terms of their usefulness for policymakers, conducting analyses, and addressing information needs. Develop adjustment methods, such as crosswalks and bridge studies that will be used to preserve trend analyses and inform users about the effects of changes.

Section 1.2 Survey Design

Standard 1.2: Agencies must develop a survey design, including defining the target population, designing the sampling plan, specifying the data collection instrument and methods, developing a realistic timetable and cost estimate, and selecting samples using generally accepted statistical methods (e.g., probabilistic methods that can provide estimates of sampling error). Any use of nonprobability sampling methods (e.g., cut-off or model-based samples) must be justified statistically and be able to measure estimation error. The size and design of the sample must reflect the level of detail needed in tabulations and other data products, and the precision required of key estimates. Documentation of each of these activities and resulting decisions must be maintained in the project files for use in documentation (see Standards 7.3 and 7.4).

Key Terms: bias, confidentiality, cut-off sample, domain, effective sample size, estimation error, frame, imputation, key variables, model-based sample, nonprobabilistic methods, nonsampling error, power, precision, probabilistic methods, probability of selection, response rate, sampling error, sampling unit, strata, target population, total mean square error, variance

The following guidelines represent best practices that may be useful in fulfilling the goals of the standard:

Guideline 1.2.1: Include the following in the survey design: the proposed target population, response rate goals, frequency and timing of collection, data collection methods, sample design, sample size, precision requirements, and, where applicable, an effective sample size determination based on power analyses for key variables.

Guideline 1.2.2: Ensure the sample design will yield the data required to meet the objectives of the survey. Include the following in the sample design: identification of the sampling frame and the adequacy of the frame; the sampling unit used (at each stage if a multistage design); sampling strata; power analyses to determine sample sizes and effective sample sizes for key variables by reporting domains (where appropriate); criteria for stratifying or clustering, sample size by stratum, and the known probabilities of selection; response rate goals (see Standard 1.3); estimation and weighting plan; variance estimation techniques appropriate to the survey design; and expected precision of estimates for key variables.

Guideline 1.2.3: When a nonprobabilistic sampling method is employed, include the following in the survey design documentation: a discussion of what options were considered and why the final design was selected, an estimate of the potential bias in the estimates, and the methodology to be used to measure estimation error. In addition, detail the selection process and demonstrate that units not in the sample are impartially excluded on objective grounds in the survey design documentation.

Guideline 1.2.4: Include a pledge of confidentiality (if applicable), along with instructions required to complete the survey. A clear, logical, and easy-to-follow flow of questions from a respondents point of view is a key element of a successful survey.

Guideline 1.2.5: Include the following in the data collection plans: frequency and timing of

data collections; methods of collection for achieving acceptable response rates; training of enumerators and persons coding and editing the data; and cost estimates, including the costs of pretests, nonresponse follow-up, and evaluation studies.

Guideline 1.2.6: Whenever possible, construct an estimate of total mean square error in approximate terms, and evaluate accuracy of survey estimates by comparing with other information sources. If probability sampling is used, estimate sampling error; if nonprobability sampling is used, calculate the estimation error.

Guideline 1.2.7: When possible, estimate the effects of potential nonsampling errors including measurement errors due to interviewers, respondents, instruments, and mode; nonresponse error; coverage error; and processing error.

Section 1.3 Survey Response Rates

Standard 1.3: Agencies must design the survey to achieve the highest practical rates of response, commensurate with the importance of survey uses, respondent burden, and data collection costs, to ensure that survey results are representative of the target population so that they can be used with confidence to inform decisions. Nonresponse bias analyses must be conducted when unit or item response rates or other factors suggest the potential for bias to occur.

Key Terms: cross-sectional, key variables, longitudinal, nonresponse bias, response rates, stage of data collection, substitution, target population, universe

The following guidelines represent best practices that may be useful in fulfilling the goals of the standard:

Guideline 1.3.1: Calculate sample survey unit response rates without substitutions.

Guideline 1.3.2: Design data collections that will be used for sample frames for other surveys (e.g., the Decennial Census, and the Common Core of Data collection by the National Center for Education Statistics) to meet a target unit response rate of at least 95 percent, or provide a justification for a lower anticipated rate (See Section 2.1.3).

Guideline 1.3.3: Prior to data collection, identify expected unit response rates at each stage of data collection, based on content, use, mode, and type of survey.

Guideline 1.3.4: Plan for a nonresponse bias analysis if the expected unit response rate is below 80 percent (see Section 3.2.9).

Guideline 1.3.5: Plan for a nonresponse bias analysis if the expected item response rate is below 70 percent for any items used in a report (see Section 3.2.9).

Section 1.4 Pretesting Survey Systems

Standard 1.4: Agencies must ensure that all components of a survey function as intended when implemented in the full-scale survey and that measurement error is controlled by conducting a pretest of the survey components or by having successfully fielded the survey components on a previous occasion.

Key Terms: cognitive interview, edit, estimation, field test, focus group, frame, pretest, survey system, usability testing

The following guidelines represent best practices that may be useful in fulfilling the goals of the standard:

Guideline 1.4.1: Test new components of a survey using methods such as cognitive testing, focus groups, and usability testing, prior to a field test of the survey system and incorporate the results from these tests into the final design.

Guideline 1.4.2: Use field tests prior to implementation of the full-scale survey when some or all components of a survey system cannot be successfully demonstrated through previous work. The design of a field test should reflect realistic conditions, including those likely to pose difficulties for the survey. Elements to be tested include, for example, frame development, sample selection, questionnaire design, data collection, item feasibility, electronic data collection capabilities, edit specifications, data processing, estimation, file creation, and tabulations. A complete test of all components (sometimes referred to as a dress rehearsal) may be desirable for highly influential surveys.

SECTION 2 COLLECTION OF DATA

Section 2.1 Developing Sampling Frames

Standard 2.1: Agencies must ensure that the frames for the planned sample survey or census are appropriate for the study design and are evaluated against the target population for quality.

Key Terms: bias, coverage, estimation, frame, frame populations, target populations

The following guidelines represent best practices that may be useful in fulfilling the goals of the standard:

Guideline 2.1.1: Describe target populations and associated survey or sampling frames. Include the following items in this description:

1. The manner in which the frame was constructed and the maintenance procedures;
2. Any exclusions that have been applied to target and frame populations;
3. Coverage issues such as alternative frames that were considered, coverage rates (an estimation of the missing units on the frame (undercoverage), and duplicates on the frame (overcoverage)), multiple coverage rates if some addresses target multiple populations (such

as schools and children or households and individuals), what was done to improve the coverage of the frame, and how data quality and item nonresponse on the frame may have affected the coverage of the frame;

4. Any estimation techniques used to improve the coverage of estimates such as post-stratification procedures; and
5. Other limitations of the frame including the timeliness and accuracy of the frame (e.g., misclassification, eligibility, etc.).

Guideline 2.1.2: Conduct periodic evaluations of coverage rates and coverage of the target population in survey frames that are used for recurring surveys, for example, at least every 5 years.

Guideline 2.1.3: Coverage rates in excess of 95 percent overall and for each major stratum are desirable. If coverage rates fall below 85 percent, conduct an evaluation of the potential bias.

Guideline 2.1.4: Consider using frame enhancements, such as frame supplementation or dual-frame estimation, to increase coverage.

For more information on developing survey frames, see *Federal Committee on Statistical Methodology (FCSM) Statistical Policy Working Paper 17, Survey Coverage*.

Section 2.2 Required Notifications to Potential Survey Respondents

Standard 2.2: Agencies must ensure that each collection of information instrument clearly states the reasons the information is planned to be collected; the way such information is planned to be used to further the proper performance of the functions of the agency; whether responses to the collection of information are voluntary or mandatory (citing authority); the nature and extent of confidentiality to be provided, if any, citing authority; an estimate of the average respondent burden together with a request that the public direct to the agency any comments concerning the accuracy of this burden estimate and any suggestions for reducing this burden; the OMB control number; and a statement that an agency may not conduct and a person is not required to respond to an information collection request unless it displays a currently valid OMB control number.

Key Terms: confidentiality, mandatory, respondent burden, voluntary

The following guideline represents best practices that may be useful in fulfilling the goals of the standard:

Guideline 2.2.1: Provide appropriate informational materials to respondents, addressing respondent burden as well as the scope and nature of the questions to be asked. The materials may include a pre-notification letter, brochure, set of questions and answers, or an 800 number to call that does the following:

1. Informs potential respondents that they have been selected to participate in a survey;
2. Informs potential respondents about the name and nature of the survey; and

3. Provides any additional information to potential respondents that the agency is required to supply (e.g., see further requirements in the regulations implementing the Paperwork Reduction Act, 5 C.F.R. § 1320.8(b)(3)).

Section 2.3 Data Collection Methodology

Standard 2.3: Agencies must design and administer their data collection instruments and methods in a manner that achieves the best balance between maximizing data quality and controlling measurement error while minimizing respondent burden and cost.

Key Terms: imputation, item nonresponse, nonresponse bias, required response item, respondent burden, response analysis survey, response rates, target population, validation studies

The following guidelines represent best practices that may be useful in fulfilling the goals of the standard:

Guideline 2.3.1: Design the data collection instrument in a manner that minimizes respondent burden, while maximizing data quality. The following strategies may be used to achieve these goals:

1. Questions are clearly written and skip patterns easily followed;
2. The questionnaire is of reasonable length;
3. The questionnaire includes only items that have been shown to be successful in previous administrations or the questionnaire is pretested to identify problems with interpretability and ease in navigation.
4. Methods to reduce item nonresponse are adopted.

Guideline 2.3.2: Encourage respondents to participate to maximize response rates and improve data quality. The following data collection strategies can also be used to achieve high response rates:

1. Ensure that the data collection period is of adequate and reasonable length;
2. Send materials describing the data collection to respondents in advance, when possible;
3. Plan an adequate number of contact attempts; and
4. If applicable, train interviewers and other staff who may have contact with respondents in techniques for obtaining respondent cooperation and building rapport with respondents. Techniques for building rapport include respect for respondents' rights, follow-up skills, knowledge of the goals and objectives of the data collection, and knowledge of the uses of the data.
5. Although incentives are not typically used in Federal surveys, agencies may consider use of respondent incentives if they believe incentives would be necessary to use for a particular survey in order to achieve data of sufficient quality for their intended use(s).

Guideline 2.3.3: The way a data collection is designed and administered also contributes to data quality. The following issues are important to consider:

1. Given the characteristics of the target population, the objectives of the data collection, the resources available, and time constraints, determine the appropriateness of the method of data collection (e.g., mail, telephone, personal interview, Internet);
2. Collect data at the most appropriate time of year, when relevant;
3. Establish the data collection protocol to be followed by the field staff;
4. Provide training for field staff on new protocols, with refresher training on a routine, recurring cycle;
5. Establish best practice mechanisms to minimize interviewer falsification, such as protocols for monitoring interviewers and reinterviewing respondents;
6. Conduct response analysis surveys or other validation studies for new data collection efforts that have not been validated;
7. Establish protocols that minimize measurement error, such as conducting response analysis surveys to ensure records exist for data elements requested for business surveys, establishing recall periods that are reasonable for demographic surveys, and developing computer systems to ensure Internet data collections function properly; and
8. Quantify nonsampling errors to the extent possible.

Guideline 2.3.4: Develop protocols to monitor data collection activities, with strategies to correct identified problems. The following issues are important to consider:

1. Implement quality and performance measurement and process control systems to monitor data collection activities and integrate them into the data collection process. These processes, systems, and tools will provide timely measurement and reporting of all critical components of the data collection process, on the dimensions of progress, response, quality, and cost. Thus, managers will be able to identify and resolve problems and ensure that the data collection is completed successfully. Additionally, these measurements will provide survey designers and data users with indicators of survey performance and resultant data quality.
2. Use internal reporting systems that provide timely reporting of response rates and the reasons for nonresponse throughout the data collection. These systems should be flexible enough to identify important subgroups with low response rates for more intensive follow-ups.
3. If response rates are low and it is impossible to conduct more extensive procedures for the full sample, select a probabilistic subsample of nonrespondents for the more intensive data collection method. This subsample permits a description of nonrespondents' characteristics, provides data needed for nonresponse bias analysis, and allows for possible weight adjustments or for imputation of missing characteristics.
4. Determine a set of required response items to obtain when a respondent is unwilling to cooperate fully. These items may then be targeted in the nonresponse follow-up in order to meet the minimum standard for unit response. These items may also be used in a nonresponse bias analysis that compares characteristics of respondents and nonrespondents using the sample data for those items. These required response items may also be used for item nonresponse imputation systems.

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SECTION 3 PROCESSING AND EDITING OF DATA

Section 3.1 Data Editing

Standard 3.1: Agencies must edit data appropriately, based on available information, to mitigate or correct detectable errors.

Key Terms: editing

The following guidelines represent best practices that may be useful in fulfilling the goals of the standard:

Guideline 3.1.1: Check and edit data to mitigate errors. Data editing is an iterative and interactive process that includes procedures for detecting and correcting errors in the data. Editing uses available information and some assumptions to derive substitute values for inconsistent values in a data file. When electronic data collection methods are used, data are usually edited both during and after data collection. Include results from analysis of data and input from subject matter specialists in the development of edit rules and edit parameters. As appropriate, check data for the following and edit if errors are detected:

1. Responses that fall outside a prespecified range (e.g., based on expert judgment or previous responses) or, for categorical responses, are not equal to specified categories;
2. Consistency, such as the sum of categories matches the reported total, or responses to different questions are logical;
3. Contradictory responses and incorrect flow through prescribed skip patterns;
4. Missing data that can be directly filled from other portions of the same record (including the sample frame);
5. The omission and duplication of records; and
6. Inconsistency between estimates and outside sources.

Guideline 3.1.2: Possible actions for failed edits include the following:

1. Automated correction within specified criteria;
2. Data verified by respondent, and edit overridden;
3. Corrected data provided by respondent;
4. Corrected data available from other sources;
5. If unable to contact respondent, and after review by survey staff, an imputed value may be substituted for a failed edit; and
6. Data edit failure overridden after review by survey staff.

Guideline 3.1.3: Code the data set to indicate any actions taken during editing, and/or retain the unedited data along with the edited data.

For more information on data editing, see *FCSM Statistical Policy Working Paper 18, Data Editing in Federal Statistical Agencies*, and *FCSM Statistical Policy Working Paper 25, Data Editing Workshop and Exposition*.

Section 3.2 Nonresponse Analysis and Response Rate Calculation

Standard 3.2: Agencies must appropriately measure, adjust for, report, and analyze unit and item nonresponse to assess their effects on data quality and to inform users. Response rates must be computed using standard formulas to measure the proportion of the eligible sample that is represented by the responding units in each study, as an indicator of potential nonresponse bias.

Key Terms: bias, cross-wave imputation, cross-sectional, eligible sample unit, frame, imputation, item nonresponse, key variables, longitudinal, longitudinal analysis, missing at random, missing completely at random, multivariate analysis, multivariate modeling, nonresponse bias, overall unit nonresponse, probability of selection, response rates, stages of data collection, unit nonresponse, wave, weights

The following guidelines represent best practices that may be useful in fulfilling the goals of the standard:

Guideline 3.2.1: Calculate all response rates unweighted and weighted. Calculate weighted response rates based on the probability of selection or, in the case of establishment surveys, on the proportion of key characteristics that is represented by the responding units. Agencies may report other response rates in addition to those given below (e.g., to show the range of response rates given different assumptions about eligibility) as long as the rates below are reported and any additional rates are clearly defined.

Guideline 3.2.2: Calculate unweighted unit response rates (RRU) as the ratio of the number of completed cases (or sufficient partials) (C) to the number of in-scope sample cases (AAPOR, 2004). There are a number of different categories of cases that comprise the total number of in-scope cases:

- C = number of completed cases or sufficient partials;
- R = number of refused cases;
- NC = number of noncontacted sample units known to be eligible;
- O = number of eligible sample units not responding for reasons other than refusal;
- U = number of sample units of unknown eligibility, not completed; and
- e = estimated proportion of sample units of unknown eligibility that are eligible.

The unweighted unit response rate represents a composite of these components:

$$RRU = \frac{C}{C + R + NC + O + e(U)}$$

Guideline 3.2.3: Calculate weighted unit response rates (RRW) to take into account the different probabilities of selection of sample units, or for economic surveys, the different proportions of key characteristics that are represented by the responding units. For each observation i :

- $C_i = 1$ if the i th case is completed (or is a sufficient partial), and $C_i = 0$ if the i th case is not completed;
- $R_i = 1$ if the i th case is a refusal and $R_i = 0$ if the i th case is not a refusal;
- $NC_i = 1$ if the i th case is a noncontacted sample unit known to be eligible and $NC_i = 0$ if

the *ith* case is not a noncontacted sample unit known to be eligible;
 $O_i = 1$ if the *ith* case is a eligible sample units not responding for reasons other than refusal and $O_i = 0$ if the *ith* case is not a eligible sample unit not responding for reasons other than refusal;
 $U_i = 1$ if the *ith* case is a sample units of unknown eligibility and $U_i = 0$ if the *ith* case is not a sample unit of unknown eligibility;
 e = estimated proportion of sample units of unknown eligibility that are eligible; and
 w_i = the inverse probability of selection for the *ith* sample unit.

The weighted unit response rate can be given by summing over all sample units selected to be in the sample, as shown below:

$$RRW = \frac{\sum w_i C_i}{\sum w_i (C_i + R_i + NC_i + O_i + e(U_i))}$$

Many economic surveys use weighted response rates that reflect the proportion of a key characteristic, y , such as “total assets,” “total revenues,” or “total amount of coal produced.” Though it may be referred to as a coverage rate, it is, in fact, a weighted item response rate where the item of interest is a quantity of primary interest for the survey. If we let y_i be the value of the characteristic y for the *ith* sample unit and sum over the entire sample, then the weighted response rate can be given by:

$$RRW = \frac{\sum w_i y_i C_i}{\sum w_i y_i (C_i + R_i + NC_i + O_i + e(U_i))}$$

Alternatively, the denominator can be based on the population total from a previous period or from administrative records.

Guideline 3.2.4: Calculate the overall unit response rates for cross-sectional sample surveys (RRO^C) as the product of two or more unit-level response rates when a survey has multiple stages:

$$RRO^C = \prod_{i=1}^K RRU_i$$

Where:

RRU_i = the unit level response rate for the *ith* stage;
 C denotes cross-sectional; and
 K = the number of stages.

When a sample is drawn with probability proportionate to size (PPS), then the interpretation of RRO^C can be improved by using size weighted response rates for the K stages. This is especially helpful if nonresponse is related to the size of the sample units.

Guideline 3.2.5: Calculate longitudinal response rates for each wave. Use special procedures for longitudinal surveys where previous nonrespondents are eligible for inclusion in subsequent waves. The overall unit response rate used in longitudinal analysis (RRO^L) reflects the proportion of all eligible respondents in the sample who participated in all waves in the analysis, and includes the response rates from all stages of data collection used in the analysis:

$$RRO^L = \prod_{k=1}^K \frac{I_k^L}{I_k^1 + R_k^1 + O_k^1 + NC_k^1 + e_k(U_k^1)}$$

where:

K = the last stage of data collection used in the analysis;
 I^L = the number of responding cases common to all waves in the analysis
 R^1_k = Refusals at wave 1 at stage k
 so that $I^1_k + R^1_k + O^1_k + NC^1_k + e_k(U^1_k)$ is the entire sample entered at wave 1

Guideline 3.2.6: Calculate item response rates (RRI) as the ratio of the number of respondents for whom an in-scope response was obtained (I^x for item x) to the number of respondents who were asked to answer that item. The number asked to answer an item is the number of unit-level respondents (I) minus the number of respondents with a valid skip for item x (V^x). When an abbreviated questionnaire is used to convert refusals, the eliminated questions are treated as item nonresponse:

$$RRI^x = \frac{I^x}{I - V^x}$$

Guideline 3.2.7: Calculate the total item response rates (RRT^x) for specific items as the product of the overall unit response rate (RRO) and the item response rate for item x (RRI^x):

$$RRT^x = RRO * RRI^x$$

Guideline 3.2.8: When calculating a response rate with supplemented samples, base the reported response rates on the original and the added sample cases. However, when calculating response rates where the sample was supplemented during the initial sample selection (e.g., using matched pairs), calculate unit response rates without the substituted cases included (i.e., only the original cases are used).

Guideline 3.2.9: Given a survey with an overall unit response rate of less than 80 percent, conduct an analysis of nonresponse bias using unit response rates as defined above, with an assessment of whether the data are missing completely at random. As noted above, the degree of nonresponse bias is a function of not only the response rate but also how much the respondents and nonrespondents differ on the survey variables of interest. For a sample mean, an estimate of the bias of the sample respondent mean is given by:

$$B(\bar{y}_r) = \bar{y}_r - \bar{y}_t = \left(\frac{n_{nr}}{n} \right) (\bar{y}_r - \bar{y}_{nr})$$

Where:

\bar{y}_t = the mean based on all sample cases;
 \bar{y}_r = the mean based only on respondent cases;
 \bar{y}_{nr} = the mean based only on the nonrespondent cases;
 n = the number of cases in the sample; and
 n_{nr} = the number of nonrespondent cases.

For a multistage (or wave) survey, focus the nonresponse bias analysis on each stage, with particular attention to the “problem” stages. A variety of methods can be used to examine nonresponse bias, for example, make comparisons between respondents and nonrespondents across subgroups using available sample frame variables. In the analysis of unit nonresponse, consider a multivariate modeling of response using respondent and nonrespondent frame

variables to determine if nonresponse bias exists. Comparison of the respondents to known characteristics of the population from an external source can provide an indication of possible bias, especially if the characteristics in question are related to the survey's key variables.

Guideline 3.2.10: If the item response rate is less than 70 percent, conduct an item nonresponse analysis to determine if the data are missing at random at the item level for at least the items in question, in a manner similar to that discussed in Guideline 3.2.9.

Guideline 3.2.11: In those cases where the analysis indicates that the data are not missing at random, the amount of potential bias should inform the decision to publish individual items.

Guideline 3.2.12: For data collections involving sampling, adjust weights for unit nonresponse, unless unit imputation is done. The unit nonresponse adjustment should be internally consistent, based on theoretical and empirical considerations, appropriate for the analysis, and make use of the most relevant data available.

Guideline 3.2.13: Base decisions regarding whether or not to adjust or impute data for item nonresponse on how the data will be used, the assessment of nonresponse bias that is likely to be encountered in the review of collections, prior experience with this collection, and the nonresponse analysis discussed in this section. When used, imputation and adjustment procedures should be internally consistent, based on theoretical and empirical considerations, appropriate for the analysis, and make use of the most relevant data available. If multivariate analysis is anticipated, care should be taken to use imputations that minimize the attenuation of underlying relationships.

Guideline 3.2.14: In the case of imputing longitudinal data sets, use cross-wave imputations or cross-sectional imputations.

Guideline 3.2.15: Clearly identify all imputed values on a data file (e.g., code them).

For more information on calculating response rates and conducting nonresponse bias analyses, see *FCSM Statistical Policy Working Paper 31, Measuring and Reporting Sources of Error in Surveys*.

Section 3.3 Coding

Standard 3.3: Agencies must add codes to collected data to identify aspects of data quality from the collection (e.g., missing data) in order to allow users to appropriately analyze the data. Codes added to convert information collected as text into a form that permits immediate analysis must use standardized codes, when available, to enhance comparability.

Key Terms: coding, quality assurance process

The following guidelines represent best practices that may be useful in fulfilling the goals of the standard:

Guideline 3.3.1: Insert codes into the data set that clearly identify missing data and cases where an entry is not expected (e.g., skipped over by skip pattern). Do not use blanks and zeros as codes to identify missing data, as they tend to be confused with actual data.

Guideline 3.3.2: When converting text data to codes to facilitate easier analysis, use standardized codes, if they exist. Use the Federal coding standards listed below, if applicable. Provide cross-referencing tables to the Federal standard codes for any legacy coding that does not meet the Federal standards. Develop other types of codes using existing Federal agency practice or standard codes from industry or international organizations, when they exist. Current Federal standard codes include the following:

1. FIPS Codes. The National Institute of Standards and Technology maintains Federal Information Processing Standards (FIPS) required for use in Federal information processing in accordance with OMB Circular No. A-130. Use the following FIPS for coding (see www.itl.nist.gov/fipspubs/index.htm for the most recent versions of these standards):
 - 5-2 Codes for the Identification of the States, the District of Columbia and the Outlying Areas of the United States, and Associated Areas
 - 6-4 Counties and Equivalent Entities of the United States, Its Possessions, and Associated Areas
 - 9-1 Congressional Districts of the United States
 - 10-4 Countries, Dependencies, Areas of Special Sovereignty and Their Principal Administrative Divisions
2. NAICS Codes. Use the North American Industry Classification System (NAICS) to classify establishments. NAICS was developed jointly by Canada, Mexico, and the United States to provide new comparability in statistics about business activity across North America. NAICS coding has replaced the U.S. Standard Industrial Classification (SIC) system (for more information, see www.census.gov/epcd/www/naics.html).
3. SOC Codes. Use the Standard Occupational Classification (SOC) system to classify workers into occupational categories for the purpose of collecting, calculating, or disseminating data (for more information, see www.bls.gov/soc).
4. Race and Ethnicity. Follow OMB's Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity when collecting data on race and ethnicity (for more information, see www.whitehouse.gov/omb/inforeg/statpolicy.html).
5. Statistical Areas. Use the Standards for Defining Metropolitan and Micropolitan Statistical Areas for collecting, tabulating, and publishing Federal statistics for geographic areas (for more information, see www.whitehouse.gov/omb/inforeg/statpolicy.html).

Guideline 3.3.3: When setting up a manual coding process to convert text to codes, create a quality assurance process that verifies at least a sample of the coding to determine if a specific level of coding accuracy is being maintained.

Section 3.4 Data Protection

Standard 3.4: Agencies must implement safeguards throughout the production process to ensure that survey data are handled to avoid disclosure.

Key Terms: confidential, individually-identifiable data

The following guidelines represent best practices that may be useful in fulfilling the goals of the standard:

Guideline 3.4.1: For surveys that include confidential data, establish procedures and mechanisms to ensure the information's protection during the production, use, storage, transmittal, and disposition of the survey data in any format (e.g., completed survey forms, electronic files, and printouts).

Guideline 3.4.2: Ensure that

1. Individually-identifiable survey data are protected;
2. Data systems and electronic products are protected from unauthorized intervention; and
3. Data files, network segments, servers, and desktop PCs are electronically secure from malicious software and intrusion using best available information resource security practices that are periodically monitored and updated.

Guideline 3.4.3: Ensure controlled access to data sets so that only specific, named individuals working on a particular data set can have read only, or write only, or both read and write access to that data set. Data set access rights are to be periodically reviewed by the project manager responsible for that data set in order to guard against unauthorized release or alteration.

For more information on data protection, see *FCSM Statistical Policy Working Paper 22, Report on Statistical Disclosure Limitation Methodology*, and forthcoming OMB guidance on implementation of the Confidential Information Protection and Statistical Efficiency Act of 2002 (CIPSEA).

Section 3.5 Evaluation

Standard 3.5: Agencies must evaluate the quality of the data and make the evaluation public (through technical notes and documentation included in reports of results or through a separate report) to allow users to interpret results of analyses, and to help designers of recurring surveys focus improvement efforts.

Key Terms: coverage error, instrument, item nonresponse, measurement error, nonresponse error, nonsampling error, sampling error, weights

The following guideline represents best practices that may be useful in fulfilling the goals of the standard:

Guideline 3.5.1: Include an evaluation component in the survey plan that evaluates survey procedures, results, and measurement error (see Section 1.1). Review past surveys similar to the one being planned to determine likely sources of error, appropriate evaluation methods, and problems that are likely to be encountered. Address the following areas:

1. Potential sources of error, including
 - Coverage error (including frame errors);
 - Nonresponse error;
 - Measurement error, including sources from the instrument, interviewers, and collection process; and
 - Data processing error (e.g., keying, coding, editing, and imputation error);
2. How sampling and nonsampling error will be measured, including variance estimation and studies to isolate error components;
3. How total mean square error will be assessed;
4. Methods used to reduce nonsampling error in the collected data;
5. Methods used to mitigate nonsampling error after collection;
6. Post-collection analyses of the quality of final estimates (include a comparison of the data and estimates derived from the survey to other independent collections of similar data, if available); and
7. Make evaluation studies public to inform data users.

Guideline 3.5.2: Where appropriate, develop and implement methods for bounding or estimating the nonsampling error from each source identified in the evaluation plan.

For more information on evaluations, see *FCSM Statistical Policy Working Paper 15, Measurement of Quality in Establishment Surveys*, and *FCSM Statistical Policy Working Paper 31, Measuring and Reporting Sources of Error in Surveys*.

SECTION 4 PRODUCTION OF ESTIMATES AND PROJECTIONS

Section 4.1 Developing Estimates and Projections

Standard 4.1: Agencies must use accepted theory and methods when deriving direct survey-based estimates, as well as model-based estimates and projections that use survey data. Error estimates must be calculated and disseminated to support assessment of the appropriateness of the uses of the estimates or projections. Agencies must plan and implement evaluations to assess the quality of the estimates and projections.

Key Terms: design effect, direct survey-based estimates, estimation, model, model-based estimate, model validation, population, post-stratification, projection, raking, ratio estimation, sensitivity analysis, strata, variance, weights

The following guidelines represent best practices that may be useful in fulfilling the goals of the standard:

Guideline 4.1.1: Develop direct survey estimates according to the following practices:

1. Employ weights appropriate for the sample design to calculate population estimates. However, an agency may employ an alternative method (e.g., ratio estimators) to calculate population estimates if the agency has evaluated the alternative method and determined that it leads to acceptable results.

2. Use auxiliary data to improve precision and/or reduce the error associated with direct survey estimates.
3. Calculate variance estimates by a method appropriate to a survey's sample design taking into account probabilities of selection, stratification, clustering, and the effects of nonresponse, post-stratification, and raking. The estimates must reflect any design effect resulting from a complex design.

Guideline 4.1.2: Develop model-based estimates according to accepted theory and practices (e.g., assumptions, mathematical specifications).

Guideline 4.1.3: Develop projections in accordance with accepted theory and practices (e.g., assumptions, mathematical specifications).

Guideline 4.1.4: Subject any model used for developing estimates or projections to the following:

1. Sensitivity analysis to determine if changes in key model inputs cause key model outputs to respond in a sensible fashion;
2. Model validation to analyze a model's performance by comparing the results to available independent information sources; and
3. Demonstration of reproducibility to show that, given the same inputs, the model produces similar results.

Guideline 4.1.5: Prior to producing estimates, establish criteria for determining when the error (both sampling and nonsampling) associated with a direct survey estimate, model-based estimate, or projection is too large to publicly release the estimate/projection.

Guideline 4.1.6: Document methods and models used to generate estimates and projections to help ensure objectivity, utility, transparency, and reproducibility of the estimates and projections. (For details on documentation, see Section 7.3). Also, archive data and models so the estimates/projections can be reproduced.

For more information on developing model-based estimates, see *FCSM Statistical Policy Working Paper 21, Indirect Estimators in Federal Programs*.

SECTION 5 DATA ANALYSIS

Section 5.1 Analysis and Report Planning

Standard 5.1: Agencies must develop a plan for the analysis of survey data prior to the start of a specific analysis to ensure that statistical tests are used appropriately and that adequate resources are available to complete the analysis.

Key Terms: key variables, response rates

The following guidelines represent best practices that may be useful in fulfilling the goals of the

standard:

Guideline 5.1.1: Include the following in the analysis plan:

1. An introduction that describes the purpose, the research question, relevant literature, data sources (including a brief description of the survey data and any limitations of the data), key variables to be used in the analysis, type of analysis, and significance level to be used;
2. Table and figure shells that support the analysis; and
3. A framework for technical notes including, as appropriate, the history of the survey program, data collection methods and procedures, sample design, response rates and the treatment of missing data, weighting methods, computation of standard errors, instructions for constructed variables, limitations of the data, and sources of error in the data.

Guideline 5.1.2: Include standard elements of project management in the plan, including target completion dates, the resources needed to complete each activity, and risk planning.

Section 5.2 Inference and Comparisons

Standard 5.2: Agencies must base statements of comparisons and other statistical conclusions derived from survey data on acceptable statistical practice.

Key Terms: Bonferroni adjustment, covariance, estimates, hypothesis test, multiple comparisons, p value, standard error, statistical significance, Type I error

The following guidelines represent best practices that may be useful in fulfilling the goals of the standard:

Guideline 5.2.1: Specify the criterion for judging statistical significance for tests of hypotheses (Type I error) before conducting the testing.

Guideline 5.2.2: Before including statements in information products that two characteristics being estimated differ in the actual population, make comparison tests between the two estimates, if either is constructed from a sample. Use methods for comparisons appropriate for the nature of the estimates. In most cases, this requires estimates of the standard error of the estimates and, if the estimates are not independent, an estimate of the covariance between the two estimates.

Guideline 5.2.3: When performing multiple comparisons with the same data between subgroups, include a note with the test results indicating whether or not the significance criterion (Type I error) was adjusted and, if adjusted, by what method (e.g., Bonferroni, modified Bonferroni, Tukey).

Guideline 5.2.4: When performing comparison tests, test and report only the differences that are substantively meaningful (i.e., don't necessarily run a comparison between every pair of estimates; run only those that are meaningful within the context of the data, and report only

differences that are large enough to be substantively meaningful, even if other differences are also statistically significant).

Guideline 5.2.5: Given a comparison that does not have a statistically significant difference, conclude that the data do not support a statement that they are different. If the estimates have apparent differences, but have large standard errors making the difference statistically insignificant, note this in the text or as a note with tables or graphs.

Guideline 5.2.6: Support statements about monotonic trends (strictly increasing or decreasing) in time series using appropriate tests. If extensive seasonality, irregularities, known special causes, or variation in trends are present in the data, take those into account in the trend analysis.

Guideline 5.2.7: If part of an historical series is revised, data for both the old and the new series should be published for a suitable overlap period for the use of analysts.

SECTION 6 REVIEW PROCEDURES

Section 6.1 Review of Information Products

Standard 6.1: Agencies are responsible for the quality of information that they disseminate and must institute appropriate content/subject matter, statistical, and methodological review procedures to comply with OMB and agency Information Quality Guidelines.

The following guidelines represent best practices that may be useful in fulfilling the goals of the standard:

Guideline 6.1.1: Conduct a content/subject-matter review of all information products that present a description or interpretation of results from the survey, such as analytic reports or “briefs.” Select reviewers with appropriate expertise in the subject matter, operation, or statistical program discussed in the document. Among the areas that reviewers should consider are the following:

1. Subject-matter literature is referenced in the document if appropriate;
2. Information is factually correct; and
3. Information is presented clearly and logically, conclusions follow from analysis, and no anomalous findings are ignored.

Guideline 6.1.2: Conduct a statistical and methodological review of all information products. Select reviewers with appropriate expertise in the methodology described in the document. Among the tasks that reviewers should consider are the following:

1. Review assumptions and limitations for accuracy and appropriateness;
2. Ensure that appropriate statistical methods are used and reported;
3. Review calculations and formulas for accuracy and statistical soundness;
4. Review data and presentations of data (e.g., tables) for disclosure risk, as necessary;

5. Review contents, conclusions, and technical (statistical and operational areas) recommendations to ensure that they are supported by the methodology used; and
6. Ensure that data sources and technical documentation, including data limitations, are included or referenced.

Guideline 6.1.3: Review all information products that will be disseminated electronically for compliance with Section 508 of the U.S. Rehabilitation Act (29 U.S.C. § 794d) for accessibility by persons with disabilities. Ensure that any product that is disseminated via special software is tested for accessibility and interpretability prior to dissemination.

SECTION 7 DISSEMINATION OF INFORMATION PRODUCTS

Section 7.1 Releasing Information

Standard 7.1: Agencies must release information intended for the general public according to a dissemination plan that provides for equivalent, timely access to all users and provides information to the public about the agencies' dissemination policies and procedures including those related to any planned or unanticipated data revisions.

Key Terms: estimate, forecast, key variables, model, nonsampling error, variance

The following guidelines represent best practices that may be useful in fulfilling the goals of the standard:

Guideline 7.1.1: Dissemination procedures for major information products include the following:

1. Develop schedule and mode for the release of information products;
2. Inform targeted audiences; and
3. Ensure equivalent, timely access to all users.

Guideline 7.1.2: Protect information against any unauthorized prerelease, and release information only according to established release procedures.

Guideline 7.1.3: If revisions to estimates are planned, establish a schedule for anticipated revisions, make it available to users, and identify initial releases as preliminary.

Guideline 7.1.4: Establish a policy for handling unscheduled corrections due to previously unrecognized errors. The policy may include threshold criteria (e.g., the correction will change a national level total value by more than one percent or a regional value by more than five percent) identifying conditions under which data will be corrected and redisseminated.

Guideline 7.1.5: When information products are disseminated, provide users access to the following information:

1. Definitions of key variables;

2. Source information, such as a survey form number and description of methodology used to produce the information or links to the methodology;
3. Quality-related documentation such as conceptual limitations and nonsampling error;
4. Variance estimation documentation;
5. Time period covered by the information and units of measure;
6. Data taken from alternative sources;
7. Point of contact to whom further questions can be directed;
8. Software or links to software needed to read/access the information and installation/operating instructions, if applicable;
9. Date the product was last updated; and
10. Standard dissemination policies and procedures.

Guideline 7.1.6: For information products derived using models, adhere to the following:

1. Clearly identify forecasts and derived estimates ; and
2. Make descriptions of forecasting models or derivation procedures accessible from the product along with any available evaluation of its accuracy.

Guideline 7.1.7: Include criteria for instances when information will not be publicly disseminated (e.g., underlying data are of insufficient quality) in the agency's standard dissemination policies and procedures.

For more information on electronic dissemination of statistical data, see *FCSM Statistical Policy Working Paper 24, Electronic Dissemination of Statistical Data*.

Section 7.2 Data Protection and Disclosure Avoidance for Dissemination

Standard 7.2: When releasing information products, agencies must ensure strict compliance with any confidentiality pledge to the respondents and all applicable Federal legislation and regulations.

Key Terms: confidentiality, data protection, disclosure

The following guidelines represent best practices that may be useful in fulfilling the goals of the standard:

Guideline 7.2.1: For survey information collected under a pledge of confidentiality, employ sufficient procedures and mechanisms to protect any individually-identifiable data from unauthorized disclosure.

Guideline 7.2.2: Do not publicly reveal parameters associated with disclosure limitation rules.

For more information, see *FCSM Statistical Policy Working Paper 22, Report on Statistical Disclosure Limitation Methodology*, and forthcoming OMB guidance on the Confidential Information Protection and Statistical Efficiency Act of 2002 (CIPSEA).

Section 7.3 Survey Documentation

Standard 7.3: Agencies must produce survey documentation that includes those materials necessary to understand how to properly analyze data from each survey, as well as the information necessary to replicate and evaluate each survey's results (See also Standard 1.2). Survey documentation must be readily accessible to users, unless it is necessary to restrict access to protect confidentiality.

Key Terms: coverage, editing, imputation, instrument, nonsampling error, response rates, sampling error, sampling unit, strata, variance

The following guidelines represent best practices that may be useful in fulfilling the goals of the standard:

Guideline 7.3.1: Survey system documentation includes all information necessary to analyze the data properly. Along with the final data set, documentation, at a minimum, includes the following:

1. OMB Information Collection Request package;
2. Description of variables used to uniquely identify records in the data file;
3. Description of the sample design, including strata and sampling unit identifiers to be used for analysis;
4. Final instrument(s) or a facsimile thereof for surveys conducted through a computer-assisted telephone interview (CATI) or computer-assisted personal interview (CAPI) or Web instrument that includes the following:
 - All items in the instrument (e.g., questions, check items, and help screens);
 - Items extracted from other data files to prefill the instrument (e.g., dependent data from a prior round of interviewing); and
 - Items that are input to the post data collection processing steps (e.g., output of an automated instrument);
5. Definitions of all variables, including all modifications;
6. Data file layout;
7. Descriptions of constructed variables on the data file that are computed from responses to other variables on the file;
8. Unweighted frequency counts;
9. Description of sample weights, including adjustments for nonresponse and benchmarking and how to apply them;
10. Description of how to calculate variance estimates appropriate for the survey design;
11. Description of all editing and imputation methods applied to the data (including evaluations of the methods) and how to remove imputed values from the data;
12. Descriptions of known data anomalies and corrective actions;
13. Description of the magnitude of sampling error associated with the survey;
14. Description of the sources of nonsampling error associated with the survey (e.g., coverage, measurement) and evaluations of these errors;
15. Comparisons with independent sources, if available;

16. Overall unit response rates (weighted and unweighted) and nonresponse bias analyses (if applicable); and
17. Item response rates and nonresponse bias analyses, (if applicable).

Guideline 7.3.2: To ensure that a survey can be replicated and evaluated, the agency's internal archived portion of the survey system documentation, at a minimum, must include the following:

1. Survey planning and design decisions, including the OMB Information Collection Request package;
2. Field test design and results;
3. Selected sample;
4. Sampling frame;
5. Justifications for the items on the survey instrument, including why the final items were selected;
6. All instructions to respondents and/or interviewers either about how to properly respond to a survey item or how to properly present a survey item;
7. Description of the data collection methodology;
8. Sampling plan and justifications, including any deviations from the plan;
9. Data processing plan specifications and justifications;
10. Final weighting plan specifications, including calculations for how the final weights were derived, and justifications;
11. Final imputation plan specifications and justifications;
12. Data editing plan specifications and justifications;
13. Evaluation reports;
14. Descriptions of models used for indirect estimates and projections;
15. Analysis plans;
16. Time schedule for revised data; and
17. Documentation made publicly available in conjunction with the release of data.

Guideline 7.3.3: For recurring surveys, produce a periodic evaluation report, such as a methodology report, that itemizes all sources of identified error. Where possible, provide estimates or bounds on the magnitudes of these errors; discuss the total error model for the survey; and assess the survey in terms of this model.

Guideline 7.3.4: Retain all survey documentation according to appropriate Federal records disposition and archival policy.

For more information on measuring and reporting sources of errors in surveys, see *FCSM Statistical Policy Working Paper 31, Measuring and Reporting Sources of Error in Surveys*.

Section 7.4 Documentation and Release of Public-Use Microdata

Standard 7.4: Agencies that release microdata to the public must include documentation clearly describing how the information is constructed and provide the metadata necessary for users to access and manipulate the data (See also Standard 1.2). Public-use microdata documentation and metadata must be readily accessible to users.

Key Terms: microdata, public-use microdata, record layout, stage of the data collection

The following guidelines represent best practices that may be useful in fulfilling the goals of the standard:

Guideline 7.4.1: Provide complete documentation for all data files. See Section 7.3 for additional information on file documentation.

Guideline 7.4.2: Provide a file description and record layout for each file. All variables must be clearly identified and described.

Guideline 7.4.3: Make all microdata products and documentation accessible by users with generally available software.

Guideline 7.4.4: Clearly identify all imputed values on the data file.

Guideline 7.4.5: Release public-use microdata as soon as practicable to ensure timely availability for data users.

Guideline 7.4.6: Retain all microdata products and documentation according to appropriate Federal records disposition and archival policy. Archive data with the National Archives and Records Administration and other data archives, as appropriate, so that data are available for historical research in future years.

APPENDIX DEFINITIONS OF KEY TERMS

-B-

Bias is the systematic deviation of the survey estimated value from the true population value. Bias refers to systematic errors that can occur with any sample under a specific design.

Bonferroni adjustment is a procedure for guarding against an increase in the probability of a Type I error when performing multiple significance tests. To maintain the probability of a Type I error at some selected value alpha, each of the m tests to be performed is judged against a significance level, alpha/m.

A **bridge study** continues an existing methodology concurrent with a new methodology for the purpose of examining the relationship between the new and old estimates.

-C-

Coding involves converting information into numbers or other symbols that can be more easily counted and tabulated.

Cognitive interviews are used to develop and refine questionnaires. In a typical cognitive interview, respondents report aloud everything they are thinking as they attempt to answer a survey question.

A **collection of information** is defined in the Paperwork Reduction Act as the obtaining, causing to be obtained, soliciting, or requiring the disclosure to an agency, third parties or the public of information by or for an agency by means of identical questions posed to, or identical reporting, recordkeeping, or disclosure requirements imposed on, ten or more persons, whether such collection of information is mandatory, voluntary, or required to obtain or retain a benefit.

Confidentiality involves the protection of individually-identifiable data from unauthorized disclosures.

A **consistent data series** maintains comparability over time by keeping an item fixed, or by incorporating appropriate adjustment methods in the event an item is changed.

Covariance is a characteristic that indicates the strength of relationship between two variables. It is the expected value of the product of the deviations of two random variables, x and y from their respective means.

Coverage refers to the extent to which all elements on a frame list are members of the population, and to which every element in a population appears on the frame list once and only once.

Coverage error refers to the discrepancy between statistics calculated on the frame population and the same statistics calculated on the target population. Undercoverage errors occur when target population units are missed during frame construction, and overcoverage errors occur when units are duplicated or enumerated in error.

A **crosswalk study** delineates how categories from one classification system are related to categories in a second classification system.

A **cross-sectional** sample survey is based on a representative sample of respondents drawn from a population at one point in time.

Cross-sectional imputations are based on data from a single time period.

Cross-wave imputations are imputations based on data from multiple time periods. For

example, a **cross-sectional imputation** for a time 2 salary could simply be a donor's time 2 salary. Alternatively, a cross-wave imputation could be the change in a donor's salary from time 1 to time 2 multiplied by the time 1 nonrespondent's salary.

A **cut-off sample** is a nonprobability sample that consists of the units in the population that have the largest values of a key variable (frequently the variable of interest from a previous time period). For example, a 90% cut-off sample consists of the largest units accounting for at least 90% of the population total of the key variable. Sample selection is usually done by sorting the population in decreasing order by size, and including units in the sample until the percent coverage exceeds the established cut-off.

-D-

Data protection involves techniques that are used to insure that confidential individually-identifiable data are not disclosed.

Data series are repeated collections of sequential cross-sectional or longitudinal data characteristics of the target population over time.

The **design effect (DEFF)** is the ratio of the true variance of a statistic (taking the complex sample design into account) to the variance of the statistic for a simple random sample with the same number of cases. Design effects differ for different subgroups and different statistics; no single design effect is universally applicable to any given survey or analysis.

Direct survey-based estimates are intended to achieve efficient and robust estimates of the true values of the target populations, based on the sample design and resulting survey data.

Disclosure means the public release of individually-identifiable data.

Dissemination is any agency initiated or sponsored distribution of information to the public.

Domain refers to a defined universe or a subset of the universe with specific attributes, e.g., knowledge, skills, abilities, attitudes, interests, lines of business, size of operations, etc.

-E-

Editing is the data-processing activity aimed at detecting and correcting errors.

Effect size refers to the standardized magnitude of the effect or the departure from the null hypothesis. For example, the effect size may be the amount of change over time, or the difference between two population means, divided by the appropriate population standard deviation. Multiple measures of effect size can be generated (e.g., standardized differences between means, correlations, and proportions).

The **effective sample size**, as used in the design phase, is the sample size under a simple random sample design that is equivalent to the actual sample under the complex sample design. In the case of complex sample designs, the actual sample size is determined by multiplying the effective sample size by the anticipated design effect.

An **eligible sample unit** is a unit selected for a sample that is confirmed to be a member of the target population.

Estimates result from the process of providing a numerical value for a population parameter on the basis of information collected from a survey and/or other sources.

Estimation is the process of using data from a survey and/or other sources to provide a value for an unknown population parameter (such as a mean, proportion, correlation, or effect size), or to provide a range of values in the form of a confidence interval.

Estimation error is the difference between a survey estimate and the true value of the parameter in the target population.

-F-

In a **field test**, all or some of the survey procedures are tested on a small scale that mirrors the planned full-scale implementation.

A **focus group** involves a semi structured group discussion of a topic.

Forecasts involve the specific projection that an investigator believes is most likely to provide an accurate prediction of a future value of some process.

A **frame** is a mapping of the universe elements (i.e., sampling units) onto a finite list (e.g., the population of schools on the day of the survey).

The **frame population** is the set of elements that can be enumerated prior to the selection of a survey sample.

-H-

Hypothesis testing draws a conclusion about the tenability of a stated value for a parameter. For example, sample data may be used to test whether an estimated value of a parameter (such as the difference between two population means) is sufficiently different from zero that the null hypothesis, designated H_0 (no difference in the population means), can be rejected in favor of the alternative hypothesis, H_1 (a difference between the two population means).

-I-

Imputation is the procedure for entering a value for a specific data item where the response is missing or unusable.

Individually-identifiable data refers specifically to data from any list, record, response form, completed survey, or aggregation from which information about particular individuals or their organizations may be revealed by either direct or indirect means.

Instrument refers to an evaluative device that includes tests, scales, and inventories to measure a domain using standardized procedures. It is commonly used when conducting surveys to refer to the device used to collect data, such as a questionnaire or data entry software.

Item nonresponse occurs when a respondent fails to respond to one or more relevant item(s) on a survey.

-K-

Key variables include survey-specific items for which aggregate estimates are commonly published from a study. They include, but are not restricted to, variables most commonly used in table row stubs. Key variables also include important analytic composites and other policy-relevant variables that are essential elements of the data collection. They are first defined in the initial planning stage of a survey, but may be added to as the survey and resulting analyses develop. For example, a study of student achievement might use gender, race-ethnicity, urbanicity, region, and school type (public/private) as key reporting variables.

-L-

A **longitudinal** sample survey follows the experiences and outcomes over time of a representative sample of respondents (i.e., a cohort).

Longitudinal analysis involves the analysis of data from a study in which subjects are measured repeatedly over time.

-M-

Response to a **mandatory survey** is required by law.

Measurement error is the difference between observed values of a variable recorded under similar conditions and some fixed true value (e.g., errors in reporting, reading, calculating, or recording a numerical value). Response bias is the deviation of the survey estimate from the true population value that is due to measurement error from the data collection. Potential sources of response bias include the respondent, the instrument, and the interviewer.

A **microdata** file includes the detailed responses for individual respondents.

The **minimum substantively significant effect (MSSE)** is the smallest effect, that is, the smallest departure from the null hypothesis, considered to be important for the analysis of key variables. The minimum substantively significant effect is determined during the design phase. For example, the planning document should provide the minimum change in key variables or perhaps, the minimum correlation, r , between two variables that the survey should be able to detect for a specified population domain or subdomain of analytic interest. The MSSE should be based on a broad knowledge of the field, related theories, and supporting literature.

Missing at random, for a given survey variable, refers to a situation in which the probability that a unit is missing that variable is independent of its value, but may not be independent of another variable being measured.

Missing completely at random occurs when values are missing because individuals drop out of a study in a process that is independent of both the observed measurements and those that would have been available had they not been missing.

A **model** is a formalized set of mathematical expressions quantifying the process assumed to have generated a set of observations.

A **model-based estimate** is produced by a model.

Model-based samples are selected to achieve efficient and robust estimates of the true values of the target populations under a chosen working model.

Model validation involves testing a model's predictive capabilities by comparing the model results to "known" sources of empirical data.

Multiple comparisons involve a detailed examination of the differences among a set of means.

Multivariate analysis is a generic term for many methods of analysis that are used to investigate multivariate data.

Multivariate data include data for which each observation consists of values for more than one random variable.

Multivariate modeling provides a formalized mathematical expression of the process assumed to have generated the observed multivariate data.

-N-

Nonprobabilistic methods—see “probabilistic methods.”

Nonresponse bias occurs when the observed value deviates from the population parameter due to differences between respondents and nonrespondents. Nonresponse bias may occur as a result of not obtaining 100 percent response from the selected cases.

Nonresponse error is the overall error observed in estimates caused by differences between respondents and nonrespondents. It consists of a variance component and nonresponse bias.

Nonsampling error includes measurement errors due to interviewers, respondents, instruments, and mode; nonresponse error; coverage error; and processing error.

-O-

Overall unit nonresponse reflects a combination of unit nonresponse across two or more levels of data collection, where participation at the second stage of data collection is conditional upon participation in the first stage of data collection.

-P-

The ***p* value** is the probability of the observed data's showing a more extreme value than the result, when there is no effect in the population.

In a **pilot test**, a laboratory or a very small-scale test of a questionnaire or procedure is conducted.

Population—see “target population.”

Post-stratification is applied to survey data, in which sample units are stratified after data collection using information collected in the survey and auxiliary information to adjust weights to population control totals.

The **power** ($1 - b$) of a test is defined as the probability of rejecting the null hypothesis when a specific alternative hypothesis is assumed. For example, with $b = 0.20$ for a particular alternative hypothesis, the power is 0.80, which means that 80 percent of the time the test statistic will fall in the rejection region if the parameter has the value specified by the alternative hypothesis.

Precision of survey results refers to how closely the results from a sample can reproduce the results that would be obtained from a complete count (i.e., census) conducted using the same techniques. The difference between a sample result and the result from a complete census taken under the same conditions is an indication of the precision of the sample result.

A survey **pretest** involves experimenting with different components of the questionnaire or survey design or operationalization prior to full-scale implementation. This may involve **pilot testing**, that is a laboratory or a very small-scale test of a questionnaire or procedure, or a **field test** in which all or some of the survey procedures are tested on a small scale that mirrors the planned full-scale implementation.

Probabilistic methods for survey sampling are any of a variety of methods for sampling that give a known, non-zero, probability of selection to each member of the target population. The advantage of probabilistic sampling methods is that sampling error can be calculated. Such methods include: random sampling, systematic sampling, and stratified sampling. They do not include: convenience sampling, judgment sampling, quota sampling, and snowball sampling.

Probability of selection in a survey is the probability that a given sampling unit will be selected, based on the probabilistic methods used in sampling.

A **projection** is an estimate of a future value of a characteristic based on current trends.

A **public-use data file or public-use microdata file** includes a subset of data that have been coded, aggregated, or otherwise altered to mask individually-identifiable information, and thus is available to all external users. Unique identifiers, geographic detail, and other variables that cannot be suitably altered are not included in public-use data files.

-Q-

Quality assurance processing includes any procedure or method that is aimed at maintaining or improving the reliability or validity of the data.

-R-

Raking is a multiplicative weighting technique that uses iterative proportional fitting. That is, weights are obtained as the product of a number of factors contributed by auxiliary variables. In **ratio estimation**, an auxiliary variate x_i , correlated with y_i , is obtained for each unit in the sample. The population total X of the x_i must be known. In practice, x_i is often the value of y_i at some previous time when a complete census was taken. The goal is to obtain increased precision by taking advantage of the correlation between y_i and x_i . The ratio estimate of Y , the population total of y_i , is $YR = (y/x)$, where y and x are the sample totals of y_i and x_i , respectively.

A **record layout** is a description of the data elements on the file (variable names, data types, and length of space on the file) and their physical locations.

Required response items include the minimum set of items required for a case to be considered a respondent.

Respondent burden is the estimated total time and financial resources expended by the survey respondent to generate, maintain, retain, and provide survey information.

A **response analysis survey** is a study of the capability of respondents to accurately provide the data requested for a survey.

Response bias is the deviation of the survey estimate from the true population value that is due to measurement error from the data collection. Potential sources of response bias include the respondent, the instrument, and the interviewer.

Response rates calculated using base weights measure the proportion of the sample frame that is represented by the responding units in each study.

-S-

Sampling error is the error associated with nonobservation, that is, the error that occurs because all members of the frame population are not measured. It is the error associated with the variation in samples drawn from the same frame population. The sampling error equals the square root of the variance.

Sampling units are the basic components of a sample frame. Everything covered by a sample frame must belong to one definite sampling unit, or have a measurable probability of belonging to a specific unit. The sampling unit may contain, for example, defined areas, houses, people, or businesses.

Sensitivity analysis is designed to determine how the variation in the output of a model (numerical or otherwise) can be apportioned, qualitatively or quantitatively, to changes in input parameter values and assumptions. This type of analysis is useful in ascertaining the capability of a given model, as well its robustness and reliability.

Stage of data collection includes any stage or step in the sample identification and data collection process in which data are collected from the identified sample unit. This includes information obtained that is required to proceed to the next stage of sample selection or data collection (e.g., school district permission for schools to participate or schools providing lists of teachers for sample selection of teachers).

Standard error is the standard deviation of the sampling distribution of a statistic. Although the standard error is used to estimate sampling error, it includes some nonsampling error.

Strata are created by partitioning the frame and are generally defined to include relatively homogeneous units within strata.

Statistical significance is attained when a statistical procedure applied to a set of observations yields a p value that exceeds the level of probability at which it is agreed that the null hypothesis will be rejected.

A **statistical survey** is a data collection whose purposes include the description, estimation, or analysis of the characteristics of groups, organizations, segments, activities, or geographic areas. A statistical survey may be a census or may collect information from a sample of the target population.

Substitution is the process of supplementing the sample in an unbiased manner in order to ensure it continues to be representative of the population.

A **survey system** is a set of individual surveys that are interrelated components of a data collection.

-T-

The **target population** is any group of potential sample units or persons, businesses, or other entities of interest.

The **total mean square error** is a measure of the combined overall effect of sampling and nonsampling error on the estimate.

Type I error is made when the tested hypothesis, H_0 , is falsely rejected when in fact it is true. The probability of making a Type I error is denoted by alpha (α). For example, with an alpha level of 0.05, the analyst will conclude that a difference is present in 5 percent of tests where the null hypothesis is true.

-U-

Unit nonresponse occurs when a respondent fails to respond to all required response items (i.e., fails to fill out or return a data collection instrument).

A **universe** survey involves the collection of data covering all known units in a population (i.e., a census).

Usability testing in surveys is the process whereby a group of representative users are asked to interact and perform tasks with survey materials, e.g., computer-assisted forms, to determine if the intended users can carry out planned tasks efficiently, effectively, and satisfactorily.

-V-

Validation studies are conducted to independently verify that the data collection methodology employed will obtain accurate data for the concept studied.

Validity is the degree to which an estimate is likely to be true and free of bias (systematic errors).

Variance or variance estimates— The variance is a measure based on the deviations of individual scores from the mean. However, simply summing the deviations will result in a value of 0. To get around this problem the variance is based on squared deviations of scores about the mean. When the deviations are squared, the rank order and relative distance of scores in the distribution is preserved while negative values are eliminated. Then to control for the number of subjects in the distribution, the sum of the squared deviations, $\sum(X - \bar{X})^2$, is divided by N (population) or by $N - 1$ (sample). The result is the average of the sum of the squared deviations. Response to a **voluntary** survey is not required by law.

-W-

A **wave** is a round of data collection in a longitudinal survey (e.g., the base year and each successive followup are each waves of data collection).

Weights are the inverse of the probability of selection in most probabilistic surveys. However, in the case of establishment surveys, the weights most frequently represent the estimated proportion that the responding establishments represent of the total industry. Weights may be adjusted for nonresponse.

SUPPORTING STATEMENTS
(Name)

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

4. Describe efforts to identify duplication.

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

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

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8. Provide a copy of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

12. Provide an estimate in hours of the burden of the collection of information.

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in #12 above).

14. Provide estimates of annualized cost to the Federal government.

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15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB 83-I.

16. For collections whose results will be published, outline the plans for tabulation and publication.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

(If your collection does not employ statistical methods, just say that and delete the following five questions from the format.)

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g. establishments, State and local governmental units, households, or persons) in the universe and the corresponding sample are to be provided in tabular form. The tabulation must also include expected response rates for the collection as a whole. If the collection has been conducted before, provide the actual response rate achieved.

2. Describe the procedures for the collection, including: the statistical methodology for stratification and sample selection; the estimation procedure; the degree of accuracy needed for the purpose described in the justification; any unusual problems requiring specialized sampling procedures; and any use of periodic (less frequent than annual) data collection cycles to reduce burden.

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3. Describe the methods used to maximize response rates and to deal with nonresponse. The accuracy and reliability of the information collected must be shown to be adequate for the intended uses. For collections based on sampling, a special justification must be provided if they will not yield "reliable" data that can be generalized to the universe studied.

4. Describe any tests of procedures or methods to be undertaken. Tests are encouraged as effective means to refine collections, but if ten or more test respondents are involved OMB must give prior approval.

5. Provide the name and telephone number of individuals consulted on the statistical aspects of the design, and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

009150



ADMINISTRATOR
OFFICE OF
INFORMATION AND
REGULATORY AFFAIR

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

January 20, 2006

MEMORANDUM FOR THE PRESIDENT'S MANAGEMENT COUNCIL

FROM: John D. Graham, Ph.D. *Jm*
Administrator

SUBJECT: Guidance on Agency Survey and Statistical Information Collections

The Paperwork Reduction Act of 1995 requires that Federal agency information collections employ effective and efficient survey and statistical methodologies appropriate to the purpose for which the information is to be collected. It further directs the Office of Management and Budget (OMB) to develop and oversee the implementation of Government-wide policies, principles, standards, and guidelines concerning statistical collection procedures and methods.

The attached guidance document, entitled "Questions and Answers When Designing Surveys for Information Collections" (Q&A), provides details about the OMB review process, assistance in strengthening supporting statements for information collection requests, and, most importantly, advice for improving information collection designs. The document was circulated for agency comment on December 14, 2004, and has been revised in response to comments from agencies and external peer reviewers.

The content of this document is focused on what agencies need to consider when designing information collections and preparing requests for OMB approval. The guidance addresses issues that frequently arise in OMB reviews, including topics ranging from basic procedural requirements to best practices for technical documentation of surveys. It has been written for a wide audience. We anticipate that the document will be updated and revised as developments warrant so that the guidance will remain current with professional practice and useful to the agencies. Ultimately, we hope the Q&A's will serve to improve the quality of Federal surveys and statistical information.

Please share the attached Q&A document with appropriate program managers and paperwork clearance officers in your agency.

Attachment

009151

QUESTIONS AND ANSWERS
WHEN DESIGNING SURVEYS
FOR INFORMATION COLLECTIONS

Office of Information and Regulatory Affairs
Office of Management and Budget
January 2006

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PURPOSE OF THIS GUIDANCE

Federal agencies conduct or sponsor a wide variety of information collections to gather data from businesses, individuals, schools, hospitals, and State, local, and tribal governments. Information collections employing surveys are frequently used for general purpose statistics, as well as for program evaluations or research studies that answer more specific research questions. Data collected by Federal agencies are widely used to make informed decisions and to provide necessary information for policy makers and planners. The collection of this information can take many forms and is accomplished in a variety of ways.

The Paperwork Reduction Act of 1995 (PRA) requires agencies to submit requests to collect information from the public to the Office of Management and Budget (OMB) for approval. This guidance is designed to assist agencies and their contractors in preparing Information Collection Requests (ICRs), which may be commonly known as PRA submissions or “OMB clearance packages,” for surveys used for general purpose statistics or as part of program evaluations or research studies.

1. What is the purpose of this guidance?

OMB is often asked about the ICR review process and what its expectations are, especially for collections involving surveys. These Q&As are designed to answer many of the frequently asked questions to help agencies better understand OMB’s expectations for survey information collection requests. This improved understanding should assist agencies in identifying and documenting information for inclusion in their ICRs, and should facilitate the review process.

This guidance seeks to highlight a wide range of issues that agencies need to consider when designing their surveys. Different sections of this guidance provide a very brief overview of the literature on statistical sampling and different survey methodology topics; each section provides some useful references for more information on these issues. The goal of this guidance is to help agencies to better plan and document their information collections that use surveys.

Conducting a high quality survey is a complex undertaking, and this guidance cannot (and is not intended to) take the place of professional survey methodologists and statisticians that agencies will need to consult in designing, executing, and documenting their surveys. For agencies that do not have these professionals on staff or involved in a particular collection, this guidance points out some key areas where professional consultation will be needed.

2. Does this guidance apply to all ICRs submitted to OMB?

The next two sections of this guidance (on submission of ICRs to OMB and scope of the information collection) cover some general requirements under the PRA that can generally be applied to any information collection request an agency makes. However, the focus of this guidance is on conducting surveys for general purpose statistics or as part of program evaluations or research studies:

Purpose

Surveys represent only a small percentage of all ICRs that OMB reviews. Most ICRs submitted to OMB are mandatory recordkeeping requirements, applications, or audits that are not used for statistical purposes. Because surveys require that careful attention be paid to a variety of methodological and statistical issues, agencies are required to complete Part B of the ICR supporting statement to more fully document how the survey will be conducted and analyzed (see question #10). The focus of this guidance is to assist agencies in planning surveys and documenting their proposed surveys in their ICRs.

SUBMISSION OF ICRs TO OMB

This section covers some basic questions related to the Paperwork Reduction Act (PRA) submissions that agencies prepare and submit to OMB including process issues, what is and is not covered by the PRA, and when agencies need to complete Part B of the Information Collection Request (ICR) supporting statement. Agencies should consult the OMB regulations implementing the PRA (5 C.F.R. § 1320) for more detailed and complete information.

3. When should an agency begin the PRA process?

The PRA requires that the agency publish a 60-day notice in the *Federal Register* to obtain public comment on the proposed collection, prior to submitting the information collection to OMB.¹ At the time this notice is published, agencies must have at least a draft survey instrument available for the public to review. Agencies should state in their ICRs whether any comments were received from the public, and the comments should be addressed in the ICR that is submitted to OMB.

When submitting the ICR to OMB, agencies are required to place a second notice in the *Federal Register*, allowing a 30-day public comment period and notifying the public that OMB approval is being sought and that comments may be submitted to OMB. This notice runs concurrent with the first 30 days of OMB review, and OMB has a total of 60 days after receipt of the ICR to make its decision.² Thus, agencies need to allow at least 120 days for consideration of initial public comments, the second public comment period and OMB review, plus additional time for preparation of the ICR, as well as time lags for publication of *Federal Register* notices.

Agencies may also have requirements for internal review or higher level reviews (e.g., departmental) that need to be factored into the schedule for planning a survey. A six month period, from the time the agency completes the ICR to OMB approval, is fairly common for planning purposes but varies considerably across agencies depending on internal review procedures. Thus, starting the process early can be very important to ensure timely data collection. Survey managers should consult with their agency paperwork clearance officers to ascertain what they need to do and the time required to meet agency and OMB requirements. In rare instances, the PRA does provide for expedited processing if an agency can justify an Emergency Collection (see question #9).

4. When should agencies talk to OMB about plans for a study?

The PRA and its implementing regulations provide a formal basis for OMB review of agency information collection requests. However, they do not preclude informal consultation with OMB desk officers prior to the submission of an ICR. Consultation with OMB prior to submission of an ICR is not required as part of the PRA and typically does not occur. However, if an agency is proposing a significant new collection about which it expects OMB may have questions or concerns, the agency is encouraged to consult with its OMB desk officer about the particular

¹ 5 C.F.R. § 1320.8(d)(1)

² 5 C.F.R. § 1320.10(a)

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collection in advance of submitting the ICR to OMB. When an agency is planning a new, large survey data collection, a major revision to an ongoing survey, or large-scale experiments or tests, agencies and OMB frequently find it helpful for the agency to brief OMB on the nature of the planned collection and the proposed methodology. In this less formal context, OMB and agency staff can discuss potential areas of concern, including the need for further detail and justification. This kind of early consultation can considerably reduce the likelihood that major unexpected concerns about survey methodology or statistical sample design will arise during OMB review, and it allows more time for the agency to consider alternatives if necessary. Agencies can then address any issues identified by OMB in their ICRs. While this informal consultation does not affect the timing of the formal OMB review process under the PRA, it can be of benefit in identifying some issues much earlier and may avoid delays that could otherwise occur.

5. What does it mean for an agency to conduct or sponsor an information collection?

An agency conducts or sponsors an information collection if the agency collects the information using its own staff and resources, or causes another agency or entity to collect the information, or enters into a contract or cooperative agreement with another person or contractor to obtain the information.³ If the agency requests the collection directly or indirectly through another entity or contractor or exercises control over those collecting the information, the agency is conducting or sponsoring the collection (see also question #6).

6. When are studies involving third party or investigator-initiated grants subject to PRA review?

Collections of information conducted through investigator-initiated grants (e.g., in response to a Request for Applications (RFA)) are generally not subject to OMB review under the PRA. However, information collections by a Federal grant recipient are subject to PRA review if (1) the grant recipient is conducting the collection at the specific request of the agency, or (2) the terms and conditions of the grant require specific approval by the agency for the collection or collection procedures.⁴ If either of these conditions is met, the sponsoring agency needs to seek and obtain OMB approval, and the grantee needs to display the OMB control number on the collection instrument.

For example, the National Science Foundation has many program areas that support basic research on a wide variety of topics. Proposals are reviewed by scientific panels and funding may be provided to a university researcher to study some topic, which may include a survey. Although the National Science Foundation funded the research, it did not specifically request the survey, nor does the agency approve the collection or the collection procedures. However, if another agency gives the same researcher a grant to design and conduct a survey that the agency reviews and approves, then this collection would be covered by the PRA. Agencies are encouraged to discuss specific cases with their OMB desk officers prior to collecting the information to determine whether the collection is subject to OMB review under the PRA.

³ 5 C.F.R. § 1320.3(d)

⁴ 5 C.F.R. § 1320.3(d)

7. Are focus groups subject to PRA review?

There is no exemption for focus groups in the PRA. Agencies conducting focus groups must comply with the requirements detailed in 5 C.F.R. § 1320.3(c): “Collection of information means...the obtaining...of information by or for an agency by means of identical questions posed to, or identical reporting, record-keeping, or disclosure requirements imposed on, ten or more persons...” It then goes on to clarify “ten or more persons refers to the persons to whom a collection of information is addressed by the agency within any 12 month period.” Thus, focus groups are covered unless the total number of persons participating within a 12-month period is fewer than ten. For example, an agency conducting three focus groups of nine persons would be subject to the PRA because the total number of participants is greater than 10.

Although each focus group may not be asked the exact same questions in the same order, focus groups should be treated as information collections under the PRA if the same information is being sought from the groups. For example, an agency that is developing questions for a survey may convene a few focus groups in different areas of the country (or composed of people with different characteristics) and may have fairly wide ranging discussions on the topic of the survey in order to hear how the participants think about that topic and the vocabulary they use. Because the flow of discussion in the different groups may lead to different areas in more depth or at different points in the discussion, some parts of the protocol may not have been necessarily followed verbatim or may have occurred at a different point in one focus group than another. However, the same information was still being sought by the agency and the collection is subject to the PRA, regardless of whether the exact questions or probes were used or used in the exact same order with each group.

When agencies submit their ICRs for focus groups to OMB, they should include the protocols or scripts for the discussion. Agencies that routinely conduct focus groups as part of their development of questionnaires (e.g., pretesting) may find it useful to obtain a generic clearance for focus groups (see questions #8, #50, #51).

In addition to using focus groups for pretesting, an agency may conduct focus groups as part of its collection of other information and in conjunction with other methods of data collection as part of an overall research study. For example, some program participants may participate in a focus group as part of a program evaluation that also includes other collections, such as surveys of program administrators and staff. In these cases, it is important that the focus groups are included and described in the ICR in the context of the collection the agency is conducting so that OMB can appropriately evaluate the entire scope of the study and the practical utility of the information the agency will obtain. Thus, agencies should include the respondent burden associated with the focus groups in the ICR along with the protocols or script for the focus groups.

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8. What are generic clearances and when are these useful for agencies?

A generic clearance is a plan for conducting more than one collection of information using very similar methods. The review of this plan occurs in two stages: (1) a full PRA review of the generic clearance ICR, which includes the general approach and methodology, at least once every three years, and (2) an expedited review of the individual collections that fall within the scope of the generic clearance. A generic clearance is considered only when the agency is able to demonstrate that there is a need for multiple, similar collections, but that the specifics of each collection cannot be determined until shortly before the data are to be collected.

Collections that are appropriate for consideration as generic include methodological tests, focus groups, or other pretesting activities (see question #51), as well as many customer satisfaction surveys. For example, an agency may want to use a "core" satisfaction survey with its many customer groups, but may want to customize the questionnaire for different groups by including some specific questions related to a particular service or publication they use.

Each collection under the generic clearance must be well defined in the overarching ICR approved by OMB in terms of its sample or respondent pool and research methodology, and each individual collection should clearly fit within the overall plan. Individual collections should not raise any substantive or policy issues or go beyond the methods specified in the generic ICR. Any individual collection that would require policy or methodological review is inappropriate for expedited review under the generic clearance and must go through the full PRA process. For example, a generic clearance is not appropriate for the collection of influential information (see question #18) and is probably not appropriate for large collections involving many respondents and high respondent burden. Agencies are encouraged to consult with their OMB desk officers before developing a generic clearance to determine whether their plans are appropriate for this type of clearance.

9. What needs to be done for an emergency clearance?

Agencies may submit an emergency ICR if the collection is both needed sooner than would be possible using normal procedures and is essential for the agency's mission. In addition, the agency must demonstrate that the time to comply with the public comment provisions of the PRA would do any of the following: (1) result in public harm; (2) prevent the agency from responding to an unanticipated event; (3) prevent or disrupt the collection; or (4) cause the agency to miss a statutory or court-ordered deadline. This type of clearance should only be sought if the agency could not have reasonably foreseen the circumstances requiring collection; it is not a substitute for inadequate planning.

Agencies submitting an emergency ICR must publish a *Federal Register* notice stating the collection is being reviewed under emergency processing procedures unless OMB waives this publication requirement. The emergency ICR must contain all of the information that would be submitted with a normal ICR. Agencies must also specify the date by which they would like OMB to act on the ICR. Approval for an emergency collection is valid for a maximum of six months. If longer approval is needed, the agency must also initiate the normal PRA approval

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process to take effect when the emergency clearance expires. Agencies are strongly encouraged to consult with their OMB desk officers prior to submitting a request for emergency clearance.

10. When do agencies need to complete Part B of the ICR Supporting Statement?

Agencies are instructed to complete Part B if they are using statistical methods, such as sampling, imputation, or other statistical estimation techniques; most research collections or program evaluations should also complete Part B.⁵ If an agency is planning to conduct a sample survey as part of its information collection, Part B of the ICR supporting statement must be completed, and an agency should also complete relevant portions of Part B when conducting a census survey (collections that are sent to the entire universe or population under study). For example, an agency doing a census of a small, well-defined population may not need to describe sampling procedures requested in Part B, but it should address what pretesting has taken place, what its data collection procedures are, how it will maximize response rates, and how it will deal with missing unit and item data.

Agencies conducting qualitative research studies or program evaluations, including case studies or focus groups, should also complete the relevant sections of Part B to provide a more complete description of the use of the information and the methods for collecting the information (see question #11).

11. Why do agencies need to complete some of Part B if they are conducting qualitative research studies or program evaluations?

Agencies need to specify how they plan to use the information they are collecting and how they will collect the information in order for OMB to properly evaluate an ICR that uses qualitative methods. There are elements of Part B that are not covered elsewhere in the justification that agencies should answer to appropriately describe the information collection. For example, an agency conducting case studies should specify in Part B:

- how the different sites and/or respondents will be selected,
- whether the agency intends to generalize beyond the specific sites and/or respondents selected,
- what pretesting has been done, and
- what different methods will be used to collect the information, e.g., in-person interviews, focus groups, observations, etc. and the protocols that will be followed to ensure high quality data are obtained.

In addition, as noted in questions #21 and #24, agencies will need to justify why they are not using statistical methods if their research questions are most appropriately addressed by a survey or other quantitative study.

⁵ See the instructions for supporting statements in Appendix A.