

**SUPPORTING STATEMENT  
U.S. Department of Commerce  
U.S. Census Bureau  
2010 Census  
OMB Control No. 0607-0919**

**Part A. Justification**

**1. Necessity of the Information Collection**

The U.S. Census Bureau (Census Bureau) requests authorization from the Office of Management and Budget (OMB) to collect data from the public as part of the 2010 Census. Article 1, Section 2 of the United States Constitution mandates that the U.S. House of Representatives be reapportioned every 10 years by conducting a national census of all residents. In addition to the reapportionment of the U.S. Congress, by law, Census data are required in order to redraw legislative district boundaries. Census data also are used to determine funding allocations for the distribution of hundreds of billions of dollars of federal and state funds each year.

Census 2000 was an operational and data quality success. However, that success was achieved at great operational risk and great expense. In response to the lessons learned from Census 2000, and in striving to better meet our Nation's ever-expanding needs for social, demographic, and geographic information, the U.S. Department of Commerce and the Census Bureau developed a multi-year effort to completely modernize and re-engineer the 2010 Census of Population and Housing. This effort required an iterative series of tests in 2003, 2004, 2005, 2006, 2007, and in 2008 that provided an opportunity to evaluate new or improved question wording and questionnaire design, methodologies, and use of technology.

We conducted the 2003 Census Test, designed to evaluate alternative self-response options and alternative presentation of the race and Hispanic origin question. The 2004 Census Test studied new methods to improve coverage, including procedures for reducing duplication, and tested respondent reaction to revised race and Hispanic origin questions, examples, and instructions. The 2005 National Census Test was designed to evaluate variations of questionnaire content and methodology; the 2006 Census Test relied on the results of the 2004 Census Test to expand on the number of new and refined methods; the 2007 test refined the design of the bilingual form; and the scope of the 2008 Census Dress Rehearsal was reduced to carrying out address canvassing of neighborhoods to improve these processes, along with mailout/mailback processes. Many of the results of these undertakings are applied to the final plans for the 2010 Census operations where feasible.

From the 2010 Census, the Census Bureau will produce the basic population totals by state for Congressional apportionment, as mandated by the Constitution, and more specifically elaborated in Title 13 U.S. Code. Title 13 of the United States Code also provides for the confidentiality of responses to various surveys and censuses.

In compliance with P.L. 94-171, for each state, the Census Bureau will tabulate total population counts by race, Hispanic origin, and, for those 18 years of age and over, by a variety of census geographic areas including legislative district, voting district, and census tabulation blocks. In compliance with P.L. 94-171, the Census Bureau also will tabulate housing unit counts by occupancy status (and vacant).

In the process of developing our data collection instruments for the 2010 Census, the Census Bureau has attempted to reduce respondent burden in two ways: (1) by providing all households a short-form questionnaire containing seven population questions for each household member and four household questions for the person completing the form, and (2) by removing, to the extent possible, addresses for which a census response has been returned late through the mail to minimize unnecessary visits to housing units by enumerators.

## **2. Needs and Uses**

This clearance request covers the 50 states, the District of Columbia, Puerto Rico, and federally affiliated Americans overseas. To enumerate these areas and overseas Americans, there are several planned operations that will be performed by various staffs in the field, at headquarters, regional census centers, and at local census offices. These operations are intended to improve the accuracy of census coverage and reduce operational risk compared to Census 2000. The clearance request for enumeration of the U.S. Virgin Islands, the Commonwealth of the Northern Mariana Islands, the Pacific Island Area of America Samoa will be covered under a separate OMB Submission package.

Information quality is an integral part of the pre-dissemination review of the information disseminated by the Census Bureau (fully described in the Census Bureau's Information Quality Guidelines). Information quality is also integral to the information collections conducted by the Census Bureau and is incorporated into the clearance process required by the Paperwork Reduction Act.

## **Operations**

### **A. Mailing Strategy for Questionnaires, Letters, Reminder Postcards**

The mailout/mailback methodology is the primary means of census taking during the 2010 Census. For over 90 percent of all addresses, the U.S. Postal Service will deliver Census Bureau-addressed questionnaires to housing units. Residents will be asked to complete and mail the questionnaires back in a postage-paid envelope. This is an increase over Census 2000 when this method was used for more than 80 percent of the housing units in the United States.

In the mailout/mailback areas of the United States, the 2010 Census will use a multiple mailing strategy—an advance notice letter, an initial questionnaire, a reminder/thank you postcard, and a replacement questionnaire. Our "multiple contact" mailing strategy was developed to get the highest mail response rate possible. Our studies have shown that mailing both a letter telling residents that a questionnaire is on the way, and a postcard reminding them to send the questionnaire in, increase the mail return rate. We have found that the second mailing or replacement mailing significantly improves response rates. In summary, mailings will include:

- An advance notice letter that alerts households that the census form will be sent to them soon.

- An initial mailing package that includes the questionnaire. In some areas the questionnaire is in English, in others it is a bilingual (English/Spanish) form.
- A reminder post card or letter that serves as a thank you for returning the questionnaire, or a reminder to mail it back. For those housing units receiving the bilingual questionnaire, the reminder will be a bilingual (English and Spanish) letter.
- A replacement questionnaire (English) package that is mailed about 10 days after the reminder postcard is mailed. There are three strategies for replacement questionnaires: 1) in select areas where we expect a low response rate, a blanket replacement questionnaire is mailed to all households in that select area; 2) in select areas where we expect a middle-range response rate, a replacement questionnaire is mailed only to the nonresponse households that do not return their initial questionnaire; and 3) where there are areas we expect a high-mail response, no replacement questionnaire will be sent.

## **B. Update/Leave Operations**

In assignment areas without street names and/or house number addresses (e.g. post office box, rural route, etc.), the census uses an Update/Leave (U/L) enumeration methodology. About 8.5 percent of the 133.7 million (total) household units will use this operation. Enumerators canvass the blocks in their assignment areas, update the address lists and census maps, determine if the listing is either a duplicate or nonexistent housing unit and thus should be deleted, and leave a census questionnaire at each unit. They also prepare and drop off questionnaires at any added housing units that they find in their assignment

areas that were not already shown on their address lists. Residents are expected to complete the questionnaire and mail it back to the Census Bureau. An enumerator will visit households that do not return a questionnaire by May 1, 2010, to obtain the information.

### **C. Update/Enumerate Operations**

1. ***Update/Enumerate (U/E):*** Update/Enumerate is a method of data collection conducted in communities with special enumeration needs, meaning those communities that include American Indian reservations and colonias (small, usually rural Spanish-speaking communities) and often lack basic physical infrastructure elements, such as running water, paved streets, and approved sewage systems. Mailing addresses of many housing units do not contain house numbers and/or street names, and it accounts for 1.2 percent of the total household units. U/E also will be implemented in resort areas with high concentrations of seasonally vacant living quarters. Enumerators will canvass assignment areas to update residential addresses by adding new ones or deleting those not found, update Census Bureau maps, and complete a questionnaire for each housing unit. In addition, each housing unit will be classified as occupied or vacant.
2. ***Remote Update Enumerate (RU/E):*** Remote Update Enumerate is performed similarly to Update/Enumerate (U/E), but in particularly remote U/E enumeration areas. This operation accounts for less than one percent of the total household

units. Areas include communities that are sparsely populated with an estimated 6,500 or fewer housing units that are not easily accessible. These areas are not included in the Local Update of Census Addresses (LUCA) program and will not have their address lists updated in the Address Canvassing operation.

3. **Remote Alaska (RA):** The remote areas of Alaska will be enumerated using the Update/Enumerate method. Remote Alaska is identified as Wade Hampton, the Seward Peninsula, the Aleutian Chain, and the Arctic/North Slope. Outlying or remote communities in Alaska range from a few people to several hundred. Roads rarely exist to connect the outlying communities. Most of these small communities are accessible only by small engine aircraft, snowmobiles, four-wheel drive vehicles, dog sled or a combination thereof. Due to the sequential timing of the spring thaw across Alaska, we will conduct the operation in three phases beginning in January 2010 before the thaw begins, and thus when conditions are most favorable for traveling and reaching respondents.

#### **D. Enumeration at Transitory Locations (ETL) Operations**

The ETL field operation enumerates individuals who do not have a Usual Home Elsewhere (UHE) and are staying at transitory locations at the time of enumeration. Transitory locations include recreational vehicle parks, campgrounds, hotels, motels (including those on military sites), marinas, racetracks, circuses, and carnivals. Field supervisors and Crew Leaders will make an advance contact with the transitory locations to explain the operation, gather information about the size of the location, and make an appointment to conduct the canvassing and interviewing. On the scheduled date, a team

of at least two enumerators will visit, canvass the area designated for occupation, and interview an occupant at each occupied site. (There is an exception for motels and hotels. At these locations, enumerators will only contact the units identified by hotel management as being occupied by other than regular travelers.) Enumerators will ask the respondents if they have a UHE. If they do not, the enumerator will conduct an interview to capture information about each of the persons living or staying at the unit. If the occupants do have a UHE, the enumerator will not conduct an interview, and the respondents will be reminded to complete the questionnaire that was mailed to their home.

**E. Be Counted Program and Questionnaire Assistance Center**

1. ***Be Counted (BC) Program:*** The Be Counted program is designed for persons who believe they were not counted in the 2010 Census. Some examples include: 1) people with a usual address and who did not receive a questionnaire at their address; 2) people who believe they returned a questionnaire for their address but were excluded; and 3) people who have no usual residence. The Census Bureau will place unaddressed BC questionnaires at selected public sites that are easily accessible and frequented by large numbers of people. The BC questionnaires will be printed in English, Spanish, Chinese, Korean, Vietnamese, and Russian languages and contain the mailout/mailback questions, along with address fields so that respondents can provide address information.

The BC questionnaire returns whose address is already in the Census Master Address File (MAF) are unduplicated to make sure that people are not being counted twice. For BC questionnaires whose address is not in the Census MAF, the Census Bureau will send enumerators out into the field to verify the existence of those housing units.

2. ***Questionnaire Assistance Centers (QAC):*** These are “walk-in” community locations where people are provided assistance in completing their census questionnaire, help with overcoming language barriers, and provided with answers to general questions about the census. People can pick up Be Counted questionnaires if they have misplaced the original questionnaire that was mailed to their residence. People will be able to locate a QAC by contacting a Census Bureau local census office. QAC will be advertised and promoted through partnership programs.

## **F. Group Quarters (GQ) Operations**

1. ***Group Quarters Advance Visit (GQAV):*** The GQAV operation is conducted to inform the contact person at each GQ of the upcoming GQ enumeration to address privacy and confidentiality concerns relating to personal identifiable information and to identify any security issues, such as restricted access, required credentials, etc. Crew leaders visit all GQs and conduct an interview with the designated contact person to verify the GQ name, address, contact name, and

phone number, and obtain a mutually agreed-upon date and time to conduct the enumeration and obtain an expected Census Day population. The information collected during the interview is used to prepare the correct amount of census materials needed to conduct the enumeration at the facility.

2. **Group Quarters Enumeration (GQE):** The GQE operation will be conducted at the Group Quarters on the date determined during the Advance Visit. During the GQE, three different enumeration methods can be used to enumerate the population: 1) interview residents in group quarters like skilled nursing facilities; 2) distribute questionnaire packets for residents in colleges and universities to complete; and 3) use administrative records in places where it is disruptive or unsafe for Census personnel to conduct the enumeration, such as prisons. Enumerators will visit group quarters to develop a control list of all residents and distribute census questionnaires Individual Census Reports (ICRs) for residents to complete, interview the residents and enter the data on the ICR, or use administrative records to complete the ICR. Enumerators collect and review completed ICRs to ensure that they are complete and legible. They will also complete an ICR for any resident on the control list who did not complete one.

As part of the GQ enumeration, the following enumerations are also conducted:

- **Service-Based Enumeration (SBE):** The SBE is designed to enumerate people experiencing homelessness and who may otherwise be missed during the enumeration of housing units and group quarters. People are enumerated

at places where they receive services and at targeted non-sheltered outdoor locations. SBE locations will include emergency and transitional shelters with sleeping facilities, providing shelter for people experiencing homelessness, domestic violence shelters, soup kitchens, regularly scheduled mobile food van stops, and targeted non-sheltered outdoor locations. This phase of the GQ operation is conducted to provide an opportunity for people experiencing homelessness to be included in the census.

- ***Military Group Quarters Enumeration:*** Military Group Quarters Enumeration is a special component of the GQE designed to enumerate military personnel assigned to barracks, dormitories, military treatment facilities, and disciplinary barracks and jails. Military Census Reports (MCRs) are distributed to the residents of the military GQ facilities. (Military families living in housing units on bases are enumerated using the mailout/mailback methodology.) For people living or staying in Military GQs, the Census Bureau provides enumeration procedures, training, and questionnaires to the designated military personnel, who then conduct the actual enumeration on the base. During the military enumeration, designated base personnel distribute census questionnaires to all military personnel assigned to the GQs. Within a few days, the designated base personnel collect the completed questionnaires and obtain any census information missing on the questionnaire. Census staff return to the base to collect the completed questionnaires.

- ***Domestic Military/Maritime Vessels Enumerations:*** The Military/Maritime Vessels Enumeration (MMVE) is a special component of the Group Quarters Enumeration operation designed to enumerate people residing on U.S. military ships or on maritime vessels in operation at the time of the census. This is also known as Shipboard Enumeration. The MMVE uses Shipboard Census Reports (SCRs) which are distributed to every Navy and Coast Guard vessel home-ported in the United States and to U.S. owned and operated flagged vessels used for commercial and non-combatant government purposes. The Census Bureau provides enumeration procedures, training, and SCRs to the designated personnel, who then conduct the actual enumeration on the vessels. Designated vessel personnel distribute the SCRs to those living on the vessels, collect the completed SCRs, obtain any census information missing on the SCRs, and mail them to a Census Processing Office using a prepaid envelope.

## **H. Nonresponse Operations**

The Nonresponse Operations will conduct field follow up for all mail back, non-responding housing units. Nonresponse is a paper-based operation that will utilize paper maps, paper address registers, paper assignment tracking reports, and paper enumerator questionnaires and forms. There are three nonresponse operations: 1) Nonresponse Followup (NRFU) Production, 2) the NRFU Reinterview (NRFU RI), and 3) the Vacant/Delete Check (VDC).

1. ***Nonresponse Followup (NRFU):*** In April 2010, the Census Bureau will begin

identifying the addresses from the mailed-back returns for which we have not received a response, and create enumerator assignments to be used for collecting information from non-responding households. Prior to enumerators beginning field work, we will attempt to remove late mail returns from address registers to avoid unnecessary visits to households. Beginning early May, enumerators will visit every address for which a household did not respond and complete a census questionnaire for that household. Enumerators also will complete a census questionnaire for any household or housing unit they discover that is not shown on the assignment list within their particular assignment area. Housing units will be classified as occupied, vacant, or delete.

2. ***Nonresponse Followup Reinterview (NRFU RI):*** NRFU RI is a quality assurance operation on the actual NRFU production operation. It is designed to:
  - 1) ensure that the enumerator correctly followed the NRFU field procedures, and
  - 2) identify enumerators who intentionally or unintentionally produced data errors.A sample of households for an enumerator will be contacted again by an independent staff of Census enumerators. This contact will be made first by telephone and then in person if the telephone attempts are unsuccessful. Enumerators will verify that a production enumerator visited the address and conducted an interview. If the respondent indicates a visit by an enumerator, the reinterview enumerator will collect housing unit status and the names of the household members. Collecting this information allows matching it to the NRFU production enumeration questionnaire. However, if the respondent states there was no visit, the reinterview enumerator will conduct a full interview.

3. ***Vacant/Delete Check (VDC) Field Operation:*** The NRFU VDC operation is an independent followup of addresses classified as vacant or nonexistent (deletes) during NRFU as well as cases added since the NRFU universe was initially identified.

The NRFU VDC operation workload consists of several components: addresses classified as vacant or nonexistent (deletes) during NRFU; supplemental nonresponse cases identified from Update/Leave, New Construction, Local Update of Census Addresses (LUCA) Appeals operations, and Delivery Sequence File (DSF) Refresh updates. Finally, an automated Operations Control System (OCS) process will accumulate Blank Mail Returns (Reverse Check-ins) and questionnaires checked in but not scanned and add them to the VDC workload.

The workload is assigned to enumerators other than those who made the original classification. VDC enumerators will visit addresses to conduct an interview on Census Day (April 1, 2010) housing unit status. If the housing unit is not occupied or cannot be located, the enumerator will find a knowledgeable proxy to verify its Census Day status.

## **H. Counting Americans Overseas Operations**

The Federally Affiliated Americans Overseas Count operation obtains counts from the administrative records of Federal agencies of U.S. military and Federal civilian employees stationed overseas and their dependents living with them as of April 1, 2010.

These counts are allocated to a home state for the purposes of reapportioning seats in the U.S. House of Representatives; they are not included in sub-state allocations or redistricting. Federally affiliated Americans living overseas and their dependents living with them are reported by the employing departments and agencies, if they have a designated home state in one of the 50 states or the District of Columbia. If they do not have a designated home state, they will not be included in the final published Summary File of population data or apportioned to any state. Other private U.S. citizens living abroad and crews of merchant ships engaged in foreign transportation are not included in the overseas count.

**I. Telephone Questionnaire Assistance**

For the Telephone Questionnaire Assistance (TQA), toll-free telephone numbers (printed on mailback questionnaires) are provided for respondents to obtain information about the 2010 Census and how to complete their questionnaire. Staff will answer questions from respondents about the census questionnaire, take interviews over the phone, assist respondents who have difficulty reading or understanding the questionnaire, and accept requests for language guides and questionnaires.

**J. Field Verification**

For Be Counted questionnaires that do not possess a Master Address File identification number, the Census Bureau will send enumerators out into the field to verify the existence of those housing units that were assigned to a census block, but did not match

an address in the Master Address File. Enumerators will conduct interviews at occupied housing units.

### **3. Use of Information Technology**

Both the Telephone Questionnaire Assistance and the Nonresponse Followup Reinterview operations request the use of telecommunication to collect and verify census data. The Telephone Questionnaire Assistance (TQA) operation establishes a toll-free telephone number for callers to get assistance over the telephone. In an effort to capture census data, operators are available to interview those callers, who find it difficult to understand or read the census questionnaire. The TQA operator collects the information from the caller and enters it directly into the Decennial Response Integrated System (DRIS) through a DRIS-screen interface. For the Nonresponse Followup Reinterview operation, an enumerator will attempt to contact respondents initially by telephone to verify census information.

### **4. Efforts to Identify Duplication**

To our knowledge, this effort does not duplicate information collected by any other agency.

### **5. Minimizing Burden**

In the process of developing our data collection instruments (or questionnaires) for the 2010 Census and ensuring a minimum number of questions needed to meet legal mandates to conduct an accurate count, the Census Bureau has attempted to reduce respondent burden in two major ways: (1) by providing all households a short-form questionnaire containing seven population questions for each household member and four household questions for the person completing

the form. We estimate the response time for completing the 2010 Census questionnaires to be approximately 10 minutes, and approximately five minutes for the Individual Census Report questionnaires, and (2) the Nonresponse Followup workload will be updated to the extent possible to remove addresses for which a census response has been returned late through the mail to minimize unnecessary visits to housing units. Assignments for census takers will then be prepared using the updated workload. Just prior to the start of the operation, additional updates will be made to remove addresses of returns received after the first update. After the start of the operation, there will be two additional clerical updates to identify and remove even more late mail returns from assignments.

## **6. Consequences of Less Frequent Collection**

The Census Bureau is mandated by the United States Constitution (Article I, Section 2, Clause 3) to conduct a census every 10 years. Title 13, United States Code, Sections 141 and 193 provides the authority to do so (i.e., the conduct of the census itself, and related activities such as, post-enumeration surveys, census tests, etc.).

## **7. Special Circumstances**

No special circumstances exist.

## **8. Consultations Outside the Agency**

We have traditionally consulted with a variety of data users, including, but not limited to, academicians, national researchers, community leaders, and our Advisory Committees. Many members of these committees are well-known scholars and social or political activists, and are

respected as spokespersons for their communities and organizations. Both now and in the past, we have followed up on advice obtained through this ongoing consultation process. In addition to the committees, the Census Bureau has consulted with outside experts, including members of the National Academy of Sciences (NAS).

The Census Bureau published a notice in the *Federal Register* in order to inform the public of our intent to conduct the 2010 Census. See **Federal Register** dated March 26, 2008 (Volume 73, No. 59, pp. 15978-15981).

The Census Bureau has received public comments from the Federal Register as follows:

***Summary of Public Comments from the Federal Register***

**A. Race and Ethnicity**

The Census Bureau received five comments relating to race and ethnicity as follow:

One writer notes that an evaluation done by Westat and the Census Bureau entitled *Puerto Rico Focus Groups on the Census 2000 Race and Ethnicity Questions, July 2001*, revealed that Puerto Ricans did not find this question [on race] to be adequate and recommends that new and different categories be used for the Island of Puerto Rico, and that the study did not recommend that the “race” question be eliminated from the [2010 Census questionnaire.] The writer opines that the questionnaire would be exponentially improved if the widely used racial term “trigüeño” (which connotes mixture) was added to the racial options provided.

Another writer alleges that the information collection of the perceived and self-identified races and ethnicity of Puerto Rico residents raises concerns that were actually noted in the evaluation report, *Puerto Rico Focus Groups on the Census 2000 Race and Ethnicity Questions, July 2001*. It was reported that ‘participants could not find themselves in the available answer categories...’. The report recommended that the race question not include ‘national origin’ responses; [that Census Bureau should] consider using a different or modified version of the race question for Puerto Rico rather than the stateside version. The writer claims that none of the recommendations from this evaluation were incorporated into the 2010 Census questionnaire. It is feared that some of the same mistakes from Census 2000 will be repeated. It is recommended that Census Bureau adopt some of the recommendations if the information collected on race in Puerto Rico is to have practical value.

Three individuals shared a common letter complaining of the “race” categories used in Census 2000 and those proposed in the 2010 Census. It was stated that the racial categories are culturally inappropriate and do not reflect the people of Puerto Rico. It is recommended that Census Bureau in Puerto Rico develop a process to facilitate a dialogue to determine the proper labels that most accurately and appropriately define racial identity in Puerto Rico.

### **Census Bureau Response**

In summary, the Census Bureau was guided by the standards provided by OMB in deciding which racial categories would be included on the questionnaire. In October

1997, the OMB revised the standards by which all federal agencies are to collect and tabulate data on race. In these revised standards, 5 race groups are identified: American Indian and Alaskan Native, Asian, Black or African American, Native Hawaiian and Other Pacific Islander, and White. In addition, with OMB's approval, the census questionnaire included a category of 'some other race' for individuals who do not identify with the race groups listed.

The concept of race as used by the Census Bureau reflects self-identification; it does not indicate any clear-cut scientific definition that is biological or genetic in reference. The data for race represents self-reporting by people according to the race or races with which they most closely identify. In addition, it is recognized that the categories of the race item include both racial and national origin or socio-cultural groups. Respondents may choose more than one race category.

**B. Bilingual English/Spanish Questionnaire**

One writer alleges improper translation of instructions on questions 1 and 3. It was recommended that the Census Bureau include one municipio in Puerto Rico as a test site for the dress rehearsal of the bilingual questionnaires.

**Census Bureau Response**

The commenter's concerns about the translation of the Form DX-61 (English/Spanish) questionnaire are unfounded since this form was only used stateside, not in Puerto Rico. We see no translation issues with regard to stateside usage. This same form is planned for use in the 2010 Census. We appreciate the suggestion for a field test in Puerto Rico, but field tests are very expensive so we only can conduct a few each decade. Site

selection for these tests is based on maximizing our ability to achieve test objectives and research questions for the overall 2010 Census program.

**C. Methods of Collection**

1. The Census Bureau received five comments relating to collection methods as follows: A writer stated that Puerto Rico's master address file had not been updated since 2004 and the mail response rate there has traditionally been relatively low. [They] were notified that the Agency [Census Bureau] is considering a modified method of collection in Puerto Rico, including an address canvassing in 2009 and relying on Update/Leave operations for distributing questionnaires.

**Census Bureau Response**

For Census 2000, the enumeration of Puerto Rico was conducted using the Update/Leave method. For the first time on the island, census questionnaires were dropped off at each housing unit and the respondents were asked to mail back the completed forms. In previous censuses, we utilized the List/Enumerate method where enumerators were tasked with listing the residential addresses on blank address registers, map spotting the location of housing units on maps, and conducting interviews with households using either a short- or long-form enumerator questionnaire.

For the 2010 Census of Puerto Rico, the Census Bureau will again use the Update/Leave method. Also, the Address Canvassing Operation, to be conducted in 2009 will update the MAF in preparation for the 2010 census. Both Address Canvassing and Update/Leave will be conducted using the same procedures as for the stateside

operations. We will also conduct a rigorous Outreach and Promotion operation in Puerto Rico to maximize the mail response rate, just as we plan to do for stateside.

2. One writer indicates there is much confusion in the manner questionnaires are delivered to homes in rural and urban communities, and the ability of address canvassing to detect hidden housing units and those without specific apartment/unit labels. While the Census Bureau employs such operations as Update/Leave, Update/Enumerate, the writer alleges that problems arise when units are misclassified as to their specific enumeration area type. It is recommended that Census Bureau develop state and local partnerships for early identification of U/L and U/E areas; work with existing State Data Centers and develop a process for accurate local identification of enumeration area types; and, educate community leaders and residents of appropriate area types through partnership and promotion activities. The writer further offers that the Census Bureau needs to present a plan for identification and labeling on multi-family units and define clear procedures for verification of physical evidence.

#### **Census Bureau Response**

Unfortunately our schedule does not permit us to develop state and local partnerships, or work with State Data Centers at this time. Regions will submit their preliminary plans for 2010 Census TEA delineation by December 8. Final delineations will be submitted by January 30, 2009. But we will consider the recommendation to partner when planning TEA delineations for the 2020 Census.

With regard to presenting a plan for identifying and labeling multi-family units, we are providing our draft procedures for enumerating small multi-units.

3. One writer offers that Census Bureau conduct a “college enumeration” as a special operation beginning in early March with Nonresponse Followup occurring in early April when students are available if we are to obtain responses from them on the initial questionnaire.

**Census Bureau Response**

Colleges and universities will be enumerated during our Group Quarters Enumeration operation from March 30 – May 14, 2010. Questionnaires will be hand-delivered to residents. An enumerator will return in a few days to pick up the completed forms. This is similar to the process that has worked well in previous census.

4. Another writer offers Census Bureau ways of motivating the public to overcome obstacles that prohibit them from completing census questionnaires.

**Census Bureau Response**

For the 2010 Census, the Census Bureau will again utilize Be Counted forms and Questionnaire Assistance Centers. Partnership staff will work with local governments and community organizations to help identify the best locations, as well as to help promote the locations. In addition, new for the 2010 Census is QAC staff that will be paid and trained to help improve their ability to help respondents.

5. One writer objects to Census Bureau using administrative records to count incarcerated people in the 2010 Census and would result in inaccuracies. A direct enumeration is believed to be more accurate than administrative records.

### **Census Bureau Response**

The Census Bureau employs more than 500,000 field hands to conduct its enumeration activities across the Nation. Their safety is of the utmost concern. We cannot place our employees in situations that are potentially dangerous, nor will facility officials allow us to directly interact with the incarcerated population. We have worked successfully with designated contacts in these facilities over the years, and we will continue to use administrative records in places where it is disruptive or unsafe for Census personnel to conduct the enumeration.

## **9. Paying Respondents**

Respondents participating in this survey will not receive any form of compensation for their participation.

## **10. Assurances of Confidentiality**

The 2010 Census mailing package explains that participation is required by law, Title 13, United States Code, and includes the Census Bureau's assurance that the personal information requested will be treated as confidential, as required by the same law.

Each household, Group Quarters, and those individuals who do not have a usual residence that we contact during Nonresponse Followup will receive a Form D-31, Confidentiality Notice. The

notice explains that participants are required to respond. It includes the Census Bureau's assurance that all information that could identify individuals will be held in the strictest confidence under applicable federal statutes. Respondents also are told that their information only will be used for statistical purposes, and they are informed that Census Bureau employees are subject to fines or jail sentences if they violate their oath to protect respondents' confidentiality. This information also is included on the paper questionnaires or in the letters that respondents receive.

#### **11. Justification for Sensitive Questions**

The Census Bureau perceives no question as sensitive.

#### **12. Estimate of Hour Burden**

The respondent universe consists of approximately 133.7 million housing units in Puerto Rico and Stateside. To calculate the burden hours, we assume a theoretical 100 percent response rate. The household forms (including NRFU enumerations) will each take approximately 10 minutes to complete. Based on the results from cognitive studies, we estimate that the 2010 Census ICR questionnaires for GQE will take approximately five minutes to complete, while the 2010 Census short-form questionnaire for individual households will take approximately 10 minutes. In order to minimize the burden in the 2010 Census, we will attempt to obtain the required information from only one person in each household.

In addition to the original interviews, approximately five percent of households in the NRFU universe will be reinterviewed as part of our procedures for quality control.

Table 1—Total Burden Hours based on Responses and Time Estimates for Response

<b>Entity</b>	<b>Responses</b>	<b>Estimated Time for Response</b>	<b>Total Burden Hours</b>
Total household units	133.7 million	10 minutes	22.3 million
NRFU (47.2 million) and NRFU VDC (8.3 million) workload	55.5 million	10 minutes	9.3 million (burden included above)
NRFU RI (5 percent of NRFU Workload)	2.4 million	10 minutes	400,000
GQE Workload	11 million	5 minutes	920,000
GQ Advance Visit Workload	300,000	15 minutes	75,000
ETL Workload	1.2 million	10 minutes	200,000
ETL Advance Visit Workload	46,000	15 minutes	12,000
Be Counted Workload	500,000	10 minutes	83,300
Field Verification	1.1 million	2 minutes	38,026
Americans Overseas	45 (Agencies)	320 hours	14,400
<b>Total</b>			<b>24.0 million</b>

### 13. Estimate of Cost Burden

There is no cost to respondents, except for the time it takes to respond to the questions.

#### **14. Cost to the Federal Government**

The estimated cost for the actual implementation and evaluation of the 2010 Census as requested in the President's Fiscal Year (FY) 2009 Budget Request is approximately \$8,520 million; spread over six fiscal years (FY 2008 through FY 2013). An inter-divisional Census Bureau team developed the data collection methodologies, and the Census Bureau's Decennial Management Division allocated the resources for the implementation of the 2010 Census.

#### **15. Reason for Change in Burden**

This is a revision of a currently approved collection from the 2008 Census Dress Rehearsal. The total hours of burden to the public is increased by 23.9 million hours due to a wider application nationwide. The Dress Rehearsal was conducted in two sites—San Joaquin County, California, and South Central North Carolina—with total burden hours of 157,334; whereas, the 2010 Census will be conducted in the 50 states, the District of Columbia, Puerto Rico, and federally affiliated Americans overseas.

## 16. Project Schedule

<b>Operation</b>	<b>Start Date</b>
Begin Recruiting Program for Field Operations	October 2008
Begin Opening Early Local Census Offices (LCOs)	October 2008
Complete Local Update of Census Addresses (LUCA)	October 2008
Begin Address Canvassing	April 2009
Begin Delivery of Questionnaires	February 2010
Census Day	April 1, 2010
Begin Nonresponse Followup (NRFU)	May 1, 2010
Deliver Apportionment Counts to the President	December 31, 2010
Complete Delivery of Redistricting Data to the States	March 2011
Complete Release of All Data Products	June 2012
Complete Research, Evaluation, and Experiments Program	September 2013

## 17. Request to Not Display Expiration Date

No exemption is requested. The Census Bureau will display the expiration date on the information collection forms.

## 18. Exceptions to the Certification

There are no exceptions to the certification.