

## Supporting Statement

### A. Justification

#### 1. Necessity of the Information Collection

We request clearance to conduct the 2012 and 2014 Identity Theft Supplements (ITS) to the National Crime Victimization Survey (NCVS). The NCVS and all related contacts and protocols for the 2012 and 2014 collection year will be separately approved by OMB (OMB NO: 1121-0111), and this request is specifically for a supplemental data collection instrument that will be added to the approved NCVS core from July, 2012 through December, 2012 and July, 2014 through December, 2014 (Attachment 1). The ITS is primarily an effort to measure the prevalence of identity theft among persons, the characteristics of identity theft victims, and patterns of reporting to the police, credit bureaus, and other authorities. The ITS was also designed to collect important characteristics of identity theft such as how the victim's personal information was obtained; the physical, emotional and financial impact on victims; offender information; and the measures people take to avoid or minimize their risk of becoming an identity theft victim.

The Department of Justice considers identity theft to be one of the nation's fastest-growing crimes affecting millions of Americans each year.<sup>a</sup> The DOJ also recognizes that identity theft is a constantly evolving crime, with criminals regularly developing new ways to access and exploit personal information. There is reason to believe that identity theft could be a substitution for the decline in traditional property crimes and theft. The ITS is necessary to track this change and growth over time and to better understand the resources needed to address the problem. There is no other reliable, person-level source of data on identity theft victimization.

Since 2004, household-level identity theft statistics have been collected through the core NCVS. However, household-level data do not sufficiently get at personal experiences and responses to identity theft. Identity theft is a personal crime and in order to collect reliable data about the victim's

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<sup>a</sup> June 2009 testimony before Congress by U.S Department of Justice Deputy Assistant Attorney General Jason Weinstein available at [http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=111\\_house\\_hearings&docid=f:53643.pdf](http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=111_house_hearings&docid=f:53643.pdf).

emotional and physical response to the crime, it is necessary to ask the victim.

In the household-level collection, one head-of-household member serves as a proxy respondent for all other household members; incidents are not attributed to any one person and when there are multiple types of identity theft within one household, the data cannot clarify whether there were multiple household victims or one victim who experienced multiple types of theft. The proxy reporting strategy, while convenient and efficient, may lead to underestimations and unreliable information, especially for questions involving personal issues such as identity theft victimization. Further, the household approach does not allow for the collection of information on reporting to the police, a core objective of the NCVS and victim self-report survey mode.

Two recent federal reports have specifically recommended that the BJS expand on the household-level statistics collected through the core NCVS and collect person-level identity theft statistics. In April 2007, the President's Identity Theft Task Force released a strategic plan entitled 'Combating Identity Theft,' which addressed the need for comprehensive identity theft statistics to better understand this growing and changing crime.<sup>b</sup> It states:

"One shortcoming in the federal government's ability to understand and respond effectively to identity theft is the lack of comprehensive statistical data...The Bureau of Justice Statistics (BJS) has platforms in place, as well as the tools to create new platforms, to obtain information about identity theft *from victims* [emphasis added] and the response to identity theft from law enforcement agencies, state and federal prosecutors, and courts" (p. 70).

The Task Force went on to recommend that BJS expand the identity theft data collected through the NCVS, to gather person-level identity theft statistics. Similarly, in a March, 2010 audit of the Department's efforts to combat identity theft (Audit report number 10-21), the Department of Justice Office of

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<sup>b</sup> The President's Strategic Plan is available at: <http://www.idtheft.gov/reports/StrategicPlan.pdf>

Inspector General (OIG) recommended that BJS evaluate the feasibility of regularly collecting person-level identity theft data.<sup>c</sup> The audit stated:

“We believe the identity theft data collected by BJS is more important than ever. Therefore, we recommend that DOJ work with BJS to evaluate the timeliness of BJS’s identity theft statistics. DOJ and BJS should also consider the President’s Task Force recommendation to expand the scope of the NCVS to gather data about individual identity theft victims”  
(p. 30).

In 2008, BJS made an initial attempt to respond to early requests for person-level identity theft data with the 2008 ITS. The 2008 ITS, conducted from January through June of 2008, successfully gathered data from persons 16 or older on the prevalence of identity theft and the cost of crime to victims. The data support the notion that identity theft affects many people and causes significant loss and serious consequences for some of its victims. The data revealed that during the two-year period ending in 2008, 11.7 million persons were victims of one or more types of identity theft.<sup>d</sup> The total financial cost of identity theft during the two-year period was estimated at nearly \$17.3 billion with an average loss of \$2,400 among victims who lost \$1 or more. Over 50% of identity theft victims found the experience to be moderately or severely distressing, but only 17% reported the incident to the police.

While the 2008 ITS provided useful data and demonstrated that a person-level supplement substantially increases our understanding of the prevalence of identity theft, victims’ experiences, and the impact of and responses to crimes, the 2008 ITS suffered from several shortcomings that will be addressed by the 2012 and 2014 ITSs. First, the 2008 ITS attempted to separate victims of attempted identity theft from victims of successful identity theft through screening for monetary loss. However, subsequent analysis demonstrated that the approach resulted in an unnecessarily complicated instrument that was ultimately unsuccessful in distinguishing

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<sup>c</sup> The final report from the audit is available at <http://www.justice.gov/oig/reports/plus/a1021.pdf>.

<sup>d</sup> <http://www.bjs.gov/index.cfm?ty=pbdetail&iid=2222>

between the two categories of attempted and completed incidents. The revised ITS will ask all victims the same questions and any distinction between attempted and successful identity theft will be made during the analysis stage on the basis of monetary losses to the victim. The 2008 ITS also utilized a two-year reference period which made interpretation of the findings more difficult and less relevant to certain stakeholders. Results also demonstrated that respondents may have had difficulty with the recall of events that occurred outside of the first year. The revised ITS therefore uses a one-year reference period and includes a new section on the long-term consequences of identity theft to capture victims who experienced identity theft victimization more than one year prior but continue to deal with the consequences.

The adjustments to the 2008 ITS are addressed in more detail in the methodology section. The important point here is that the adjustments put BJS in a position to make the ITS a recurring supplement that will allow for both a snapshot of the nature and prevalence of identity theft and also an analysis of trends and changes over time. To our knowledge, there are no current sources of reliable data on identity theft that can be used to assess trends in person-level identity theft victimization over time.

We are requesting a three-year OMB clearance, from June, 2012 through June, 2015. The ITS will be conducted from July, 2012 through December 2012 and July, 2014 through December, 2014. During these 6-month periods, the supplement will be administered to all NCVS respondents age 16 or older, following the completion of the NCVS screener and the NCVS crime incident report (if applicable NCVS crimes were reported). Because the ITS will be administered on a recurring basis and will be a more reliable measure of the prevalence and consequences of identity theft, the household identity theft questions will be removed from the NCVS screener with the implementation of the 2012 ITS.

The BJS is authorized to collect statistics on victimization under Title 42, United States Code, Section 3732 of the Justice Systems Improvement Act of 1979 (Attachment 2).

## 2. Needs and Uses

The ITS provides data on the prevalence and nature of identity theft. The data collected through the ITS is needed to more fully understand identity theft and to obtain a more clear picture of its impact on society and consequences suffered by victims. Most importantly, the ITS will capture both crimes reported and not reported to the police, credit bureaus, or other authorities. Understanding this “dark figure” of crime helps to inform victim outreach efforts, resource allocation, and to gain a better understanding of victim decision-making and the resulting consequences. For example, research has demonstrated an association between reporting to the police, receiving victim services, and being involved in the criminal justice process.<sup>e</sup> The findings from the ITS will not only be beneficial to the general public by increasing awareness of this crime but they also will have significance for legislators, policymakers, and law enforcement in making sound decisions regarding these criminal acts and providing assistance to its victims.

#### *Uses of ITS data*

The table below details the type of information that will be available through the 2012/2014 ITS data.

ESTIMATES THAT CAN BE GENERATED FROM THE 2012 ITS	RELEVANT QUESTIONS
Rate/percent of persons 16 or older who experienced one or more types of attempted/successful/both id theft during the past year	Q1a, Q2a, Q3, Q4, Q5 + Q37
Rate/percent of <u>credit card holders</u> 16 or older who experienced attempted or successful misuse of existing credit card	Q2a + Q37
Rate/percent of <u>banking account holders</u> 16 or older who experienced attempted or successful misuse of existing checking, savings, debit, or ATM account	Q1a + Q37
Rate/percent of persons 16 or older who experienced attempted or successful misuse of an existing credit card	Q2a
Rate/percent of persons 16 or older who experienced attempted or successful misuse of an existing banking account	Q1a
Rate/percent of persons 16 or older who experienced attempted or successful misuse of another existing account	Q3
Rate/percent of persons 16 or older who experienced attempted or successful use of personal information to open a new account	Q4
Rate/percent of persons 16 or older who experienced attempted or successful use of personal information for other fraudulent purpose	Q5
Rate/percent of persons 16 or older who experienced multiple types of attempted or successful identity theft	Q6b
Rate/percent of persons 16 or older who experienced multiple incidents of id theft during the past year	Q6a and Q6b

<sup>e</sup> Langton, Lynn. 2011. *Use of Victim Service Agencies by Victims of Serious Violent Crime, 1993-2009*. U.S. Department of Justice Special Report (NCJ 234212), available at <http://bjs.gov>.

Percent of id theft victimizations that involved attempted or successful existing account misuse	Q1a, Q2a, Q3, Q4, Q5
Percent of id theft victimizations that involved attempted or successful use of personal information to open a new account	Q1a, Q2a, Q3, Q4, Q5
Percent of id theft victimizations that involved attempted or successful use of personal information for other fraudulent purposes.	Q1a, Q2a, Q3, Q4, Q5
Demographic characteristics of persons 16 or older who experienced one or more types of id theft during the past year	NCVS core + Q1a, Q2a, Q3, Q4, Q5 + Q37
Financial loss (direct and indirect) attributed to all successful and attempted incidents of id theft experienced by victims 16 or older during the past year	Q45 and Q46
Type of id theft experienced during most recent incident	Q6a, Q6b, Q7
How the most recent incident of id theft was discovered, by type of id theft	Q8, Q9
How long the misuse occurred during the most recent id theft incident, by type of id theft	Q10
How the victim's personal information was obtained during the most recent incident of id theft, by type of theft	Q11, Q12
Percent of most recent id theft incidents reported to police, by type of id theft	Q18
Reasons for not reporting to the police among those who did not report, by type of id theft	Q25
Percent of most recent id theft incidents reported to credit bureau, by type of id theft	Q14, Q15
Time spent resolving most recent id theft incident, by type of id theft	Q39, Q40, Q41
Financial loss (direct and indirect) attributed to most recent id theft incident, by type of theft	Q36, Q37, Q38
Emotional distress experienced as result of most recent id theft incident, by type of id theft	Section E
Percentage of respondents who have taken various actions to prevent personal information from being obtained in response to an experience with identity theft	Section I
Percentage of respondents who have taken various actions to prevent personal information from being obtained as a preventative measure	Section I
Percent of persons 16 or older who experienced at least one incident of identity theft at any point their lives, by type of theft experienced	Q1a, Q2a, Q3, Q4, Q5+ Q47, Q48
Percent of persons 16 or older who experienced an incident of identity theft more than 12 month prior to the interview but were experiencing the consequences of id theft within the 12 month reference period	Section H

Because the 2008 ITS utilized a two-year reference period and the 2012/2014 ITS surveys will have one-year reference periods, BJS will not be able to examine trends in person-level identity theft victimization from 2008 to 2012. However, we will ultimately be able to examine patterns and trends in victimization from 2012 and on. With the 2014 data, BJS will examine changes from 2012 to 2014 in the prevalence of identity theft, particularly by particular types of theft; trends in the monetary losses associated with each type of identity theft; victim reporting patterns; and trends in the demographic characteristics of identity theft victims.

The estimates that can be generated through the ITS are needed by a wide range of government agencies and victim advocacy groups, as well as to provide the general public with reliable data on the prevalence and prevention of identity theft. The paragraphs below provide examples of some of the users and uses of the 2008 ITS statistics.

### *Government agencies*

**Bureau of Justice Statistics.** The 2008 ITS data enabled BJS to report on “new and emerging” crime types, to expand the array of crime types against persons that are counted as part of national crime statistics (beyond the tradition crime types reported by the FBI), and to address a priority issue for DOJ. BJS used the data from the 2008 ITS to produce a report on person-level identity theft victimization, titled *Victims of Identity Theft, 2008* (see Attachment 3). The report covered topics such as the percentage of persons 16 or older who had experienced one or more types of identity theft during the prior two years; the direct and indirect financial losses associated with identity theft; the physiological effects of identity theft victimization; and the percentage of identity theft victimizations that went unreported to the police.

BJS disseminated the report through a press release and the BJS website. Through *AskBJS*, the BJS email account that allows data users to ask statisticians specific data questions, BJS responded to external questions from the public and media requests regarding the report findings. The report statistics were presented to and shared with the Office of Justice Program’s Identity Theft Task Force and DOJ Criminal Division’s Identity Theft Enforcement Interagency Working Group. BJS also made the 2008 ITS data available for public use and download through the archives at the University of Michigan’s Inter-University Consortium for Political and Social Research.

BJS also used the 2008 ITS data to respond to a DOJ OIG recommendation that BJS analyze the feasibility of regularly collecting person-level identity theft data.<sup>f</sup> BJS conducted a comparison of the 2008 ITS data and the household-level identity theft data collected through the core NCVS and concluded that the person-level supplement data provides an enhanced understanding of identity theft victimization and corrects for the limitations of household-level data. This assessment of the 2008 data also revealed a number of limitations and problem areas related to the administration and analysis of the ITS instrument and established a basis for the 2012 ITS redesign effort that will improve measurement of this crime type (see Attachment 4).

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<sup>f</sup> The final report from the audit is available at <http://www.justice.gov/oig/reports/plus/a1021.pdf>.

**Other federal agencies.** Like the 2008 ITS, the 2012/2014 ITS is a collaborative effort between the Bureau of Justice Statistics (BJS), Federal Trade Commission (FTC), Office for Victims of Crime (OVC), and National Institute of Justice (NIJ). The partnering agencies each have unique research interests in the area of identity theft that are not currently addressed by any existing studies. The FTC, for example, requires data on the prevalence of identity theft, how personal information is obtained by perpetrators, and the characteristics of victims. These types of data can assist the FTC in identifying populations that may be particularly vulnerable and appropriately targeting knowledge and prevention campaigns.

Other federal agencies have also expressed interest in and uses for the ITS data. The Executive Office of the U.S. Attorneys (EOUSA), for instance, was interested to learn the percentage of respondents to the 2008 ITS that had received notice of a corporate data breach during the prior two years. The National Security Staff of the Executive Office of the President also requested statistics from BJS on identity theft victimization for their planning purposes.

#### *Victim advocates*

OVC co-funded the 2008 and 2012 ITSs in the interest of obtaining data on the financial, emotional, and physiological impact of identity theft for victims. These data assist OVC and other victim advocacy groups in understanding the impact, seriousness, and harms associated with identity theft victimization, as well as the needs of identity theft victims. The information is needed for making decisions regarding the allocation of victim assistance funds and resources to various types of crime victims. Since data from the NCVS and the UCR focus on traditional street crimes, the ITS statistics also provide victim advocates with a more complete sense of the range of victims that may require assistance.

OVC publicized the release of the 2008 ITS report in a *NewsFromOVC* e-blast that went out to the agency's listserv. OVC also included a link to the report on their website.

### *Media outlets and the general public*

Findings from the 2008 ITS were published in a BJS report, *Victims of Identity Theft, 2008* (Attachment 3). Since the release of the report in December of 2010, the data have been reported by about 50 different news agencies. The findings were also reported through publications such as Consumer Reports, which used the data to discourage readers from purchasing expensive identity theft protection services that are unnecessary and ineffective.<sup>9</sup>

### 3. Use of Information Technology

The ITS will be conducted in a fully automated interviewing environment using computer-assisted personal interviewing (CAPI) methods whereby field representatives use a laptop computer to display questions and record answers. The use of CAPI technologies reduces data collection costs as well as respondent and interviewer burden. Furthermore, automated instruments afford the opportunity to implement inter-data item integrity constraints which minimize the amount of data inconsistency. More consistent data, in turn, reduces the need for extensive post-data collection editing and imputation processes which will significantly reduce the time needed to release the data for public consumption. The use of technology results in more accurate data products that are delivered in a more timely fashion giving data users access to information while it is still relevant.

### 4. Efforts to Identify Duplication

Several organizations, both public and private, have sponsored surveys and studies relating to identity theft over the last few years to understand identity theft. However, these studies have not been able to provide a comprehensive picture of identity theft. Each of the identified studies falls short of collecting data with the same breadth of information and/or

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<sup>9</sup> The 2010 Consumer Reports article utilizing data from the 2008 ITS is available at: <http://news.consumerreports.org/money/2010/12/identity-theft-exaggerations-department-of-justice-study-credit-card-banking-accounts.html>.

sample size that the ITS will attain. The ITS meets the recommendation in the President's Strategic Plan that, "The BJS should conduct its surveys in collaboration with subject matter experts from the FTC." (p. 70).

Previous studies are listed below beginning with the most recent. The ITS will be larger in scope and size than studies conducted by other public and private organizations.

- o Javelin Strategy and Research and the Better Business Bureau released Identity Fraud Survey Reports in 2005, 2006, 2007, 2008, 2009 and 2010. Javelin collected data from approximately 5,000 adults age 18 or older. Important details about the survey methodology, such as the response rates and whether Javelin conducted a nonresponse bias analysis, are not contained in the report.
- o BJS released a report titled, *Victims of Identity Theft, 2008* in December of 2010. The report presented data from the only rigorous, national survey of identity theft victims. The shortcomings of the data collection were that BJS was unable to report an annual prevalence number and could not separate attempted incidents of identity theft from incidents in which the offender was able to successfully use a victim's personal information to obtain money, goods, or services.
- o BJS released data on identity theft victimization reported by households as part of the core NCVS in 2006, 2007 and 2010. While these reports provide useful data on trends in the prevalence of households that experienced one or more types of identity theft during the prior year, the use of a proxy respondent does not allow for the collection or reporting of individual experiences, reactions, and responses to identity theft victimization, or the reporting and interaction with police and other officials.
- o The Identity Theft Resource Center released reports titled, *Identity Theft: The Aftermath*, in 2007, 2008, and 2009. While these reports present data from a victim's perspective they are not based on a nationally representative sample of persons or even victims, but are instead based on data from victims who worked with the Identity Theft Resource Center in that particular year. The experiences of these victims may not be generalizable to all identity theft victims.
- o The FTC sponsored a second identity theft survey in 2006. The full report is available at <http://www.ftc.gov/os/2007/11/SynovateFinalReportIDTheft2006.pdf>. The FTC surveyed nearly 5,000 adults and obtained a 26% response rate. Recognizing the NCVS's potential to collect data from a larger sample, the FTC became a co-sponsor on the 2008 ITS and ceased conducting an identity theft survey. The FTC has actively worked with BJS to redesign the 2012 ITS and has no new plans to conduct an identity theft survey.

- o In late 2004, the Federal Deposit Insurance Corporation released a study regarding 'account hijacking' which involves the misuse of someone's personal information to access and misuse a person's existing accounts. The full report is located at [http://www.fdic.gov/consumers/consumer/idtheftstudy/identity\\_theft.pdf](http://www.fdic.gov/consumers/consumer/idtheftstudy/identity_theft.pdf). This study specifically focuses on this subset of identity theft because the misuse of a person's existing accounts primarily affects institutions insured by the FDIC.
- o The Identity Theft Resource Center released a study of 173 known victims of identity theft in September 2003.
- o The Federal Trade Commission (FTC) sponsored an identity theft survey in 2003. The full report is located at <http://www.ftc.gov/os/2003/09/synovatereport.pdf>. The main objectives of this survey were to estimate the incidence of identity theft, measure the impact on victims, identify actions taken by victims, and explore measures that may help future victims of identity theft. The results were based on a random sample of 4,000 households.

##### 5. Minimizing Burden

The NCVS is a household-based sample and does not impact small businesses or small entities. To minimize the burden for individual respondents and reduce nonresponse rates, supplemental questionnaires like the ITS are designed to take no longer than 15 minutes to administer.

During the design phase of the 2008 ITS all attempts were made to balance the needs of the various sponsors while minimizing the respondent burden. The revised 2012/2014 ITS involves a simplified instrument that will further minimize respondent and interviewer burden. Based on analysis of the responses from the 2008 ITS, the following groups of questions were removed: questions pertaining to whether there was an attempted or successful misuse of personal information; whether any misused accounts were joint accounts; and what types of law enforcement agencies were contacted by victims and victims' perceptions of each type of contact. Analysis of the 2008 data revealed that these sections did not provide enough usable information to justify their inclusion in the revised ITS.

In 2008, 2,818 of the total 56,476 respondents to the ITS experienced some form of identity theft during the two-year reference period. The 51,658 respondents 16 years of age and older, who did not experience identity theft within the stated reference period, were administered about 10 questions which required less than 3 minutes to complete. The remaining 5% of eligible respondents, who experienced some form of identity theft, were asked a more extensive series of questions about their identity theft experience. The estimated interview length for these respondents was 15 minutes.

Even with the potential increase in identity theft victimization, because the revised ITS asks about victimizations that occurred during the prior 12 months rather than the prior 2 years, we again expect that about 5% of victims will take the full 15 minutes to complete the survey. The burden for the remaining 95% of respondents will be less than 3 minutes.

Field representatives will alert respondents to the additional burden from the supplement at the beginning of the NCVS interview. They will be instructed to inform respondents, “From time-to-time the Justice Department collects information on special topics like school crime or police-public contact. For the next 6 months, there is a special topic collection on identity theft that will take, on average, about 10 minutes.”

#### 6. Consequences of Less Frequent Collection

Person-level identity theft data was last collected through the NCVS in 2008. With the subsequent changes to the length of the reference period from two years to one year, BJS is now in the position to potentially start a recurring supplement on identity theft, beginning with the 2012 ITS. Other supplements to the NCVS, such as the School Crime Supplement (OMB NO: 1121-0184) and the Police-Public Contact Survey (OMB NO: 1121-0260), are typically conducted on a biennial basis. Particularly because of the growing and evolving nature of identity theft, the BJS anticipates conducting the ITS every two years in order to identify trends and changes in the nature of this crime. The OIG has also recommended that BJS regularly collect and report on person-level identity theft in order to assist in the Department’s efforts to combat identity theft.

The 2012 data will provide baseline information that can then be used to track changes and growth in identity theft victimization over time. By repeatedly conducting the ITS, the BJS builds up the sample sizes and has the capacity to then combine several years of data in order to generate reliable more estimates about the most serious and rare cases of identity theft as well as the less common reactions to identity theft, such as reporting to the police. If the supplement were conducted every three or four years, rather than every two years, analysts would have more difficulty combining data sets in order to study the rare reactions and the most serious cases of identity theft. A larger gap between data collections

may also inhibit the identification of growing and changing types of identity theft and victimization risk.

#### 7. Special Circumstances

Collection is consistent with the guidelines in 5 C.F.R. 1320.9.

#### 8. Federal Register Publication and Consultations Outside the Agency

The research under this clearance is consistent with the guidelines in 5 CFR 1320.6. Comments on this data collection effort were solicited in the Federal Register, Vol. 76, No. 158, pages 50758-50759 on August 15, 2011 and in Vol. 76, No. 206, pages 66086-66087 on October 25, 2011. No comments were received in response to the information provided.

The U.S. Census Bureau, the Bureau of Justice Statistics (BJS), the Federal Trade Commission (FTC), the Office of Victims of Crime (OVC), and the National Institute of Justice (NIJ) collaborated to develop the questionnaire and procedures used to collect this supplemental information. Dr. James Lynch, Dr. William Sabol, Ms. Lynn Langton, Dr. Michael Planty and Dr. Lynn Addington, from the BJS; Mr. David Lincicum and Dr. Keith Anderson, from the FTC; Ms. Laura Ivkovich and Ms. Joye Frost, from OVC, and Dr. Katrina Baum and Ms. Karen Stern from NIJ were the principal consultants. Ms. La Terri Bynum, Ms. Meagan Wilson, and Mr. Steve Bittner of the Demographic Surveys Division, and Ms. Theresa DeMaio, Ms. Katherine Drom, and Ms. Rachel Freidus of the Center for Survey Measurement, were the principal consultants from the Census Bureau.

The 2008 ITS, which was comprised of most of the same questions as the revised 2012/2014 ITS, was also reviewed by number of outside reviewers who are experts in the area of identity theft: Mr. Mark Gage, National White Collar Crime Center; Ms. Kelly Buck, PERSEREC; Mr. Jonathan Rusch, Criminal Division of U.S. Department of Justice; Mr. Gary Gordon, Center for Identity Management & Information Protection; Mr. Vince Talucci, International Association of Chiefs of Police; Dr. Dean Kilpatrick, National Crime Victim Research & Treatment Center; Mr. Henry N. Pontel, UC Irvine; Dr. Kevin Becker, Institute for Trauma & Crisis at Harvard Medical School; Mr. Kevin O'Brien, National Center for Victims of Crime; and Ms. Anne Wallace, Identity Theft Assistance Corporation.

## 9. Paying Respondents

Payment or gifts to respondents is not provided in return for participation in the supplement.

## 10. Assurance of Confidentiality

All NCVS information about individuals or households is confidential by law--Title 42, United States Code, Sections 3789g and 3735 (formerly Section 3771) and Title 13, United States Code, Section 9. Only Census Bureau employees sworn to preserve this confidentiality may see the survey responses. Even BJS, as the sponsor of the survey, is not authorized to see or handle the data in its raw form. All unique and identifying information is scrambled or suppressed before it is provided to BJS to analyze. Data are maintained in secure environments and in restricted access locations within the Census Bureau. All data provided to BJS must meet the confidentiality requirements set forth by the Disclosure Review Board at the Census Bureau.

In a letter signed by the Director of the Census Bureau, sent to all participants in the survey, respondents are informed of this law and assured that it requires the Census Bureau to keep all information provided by the respondent confidential. The letter also informs respondents that this is a voluntary survey. Furthermore, in addition to the legal authority and voluntary nature of the survey, the letter informs respondents of the public reporting burden for this collection of information, the principal purposes for collecting the information, and the various uses for the data after it is collected which satisfies the requirements of the Privacy Act of 1974.

## 11. Justification for Sensitive Questions

N/A. The ITS does not ask questions relating to sexual behaviors, drug use, religious beliefs, or other matters commonly considered private or of a sensitive nature.

## 12. Estimate of Hour Burden

Only respondents, ages 16 and older, that complete the NCVS-1 and NCVS-2 are eligible to receive the ITS instrument. We estimate that 78,000 NCVS respondents will be eligible to be interviewed for the ITS between July and December, 2012. Based on experiences with the 2008 ITS, we estimate each screening interview, long-term consequences and victim risk sections will take, on average, 0.08 hours (5 minutes) and each full interview for persons experiencing identity theft will take, on average, 0.25 hours (15 minutes) to complete. The 2008 ITS found that 5% of all persons 16 or older were victims of identity theft during a two-year period. The 2012 ITS has a one-year reference period but with the anticipated growth in identity theft victimizations, we again expect that 5% of respondents will be victims.

Also, assuming that the 2012 ITS experiences a similar response rate as the 2008 ITS, about 89%, or 69,420 of the 78,000, eligible respondents will be interviewed. Thus, the assumption is that 5% of the 69,420 interviewed respondents will be victims of identity theft and therefore follow the long interview path in the questionnaire. The remaining 95% will not be victims of identity theft and, as such, will follow the short interview path. As stated above, our assumption is that the short interview path will take 3 minutes and the long interview path will take 15 minutes. Total expected respondent burden is therefore calculated as:

$$69,420 \times (.05) \times (.25 \text{ hours}) + 69,420 \times (.95) \times (.08 \text{ hours}) = 6,144 \text{ total hours}$$

### 13. Estimate of Cost Burden

There are no costs to respondents other than that of their time to respond.

### 14. Cost to Federal Government

There are no capital or start-up costs associated with the data collection.

The estimated annual cost to the Federal Government for the 2012 ITS is \$1.02 million in FY 2011 and 2012. Total estimated cost for the 2014 ITS is \$1.02 million in FY 2014.

Total estimated costs are divided between Census Bureau collection costs and BJS analysis, reporting, and dissemination costs. Both Census and BJS costs include salary, fringe, and overhead. The Census Bureau handles all aspects of collecting and preparing data for analysis at cost of \$962,936. The largest share of Census costs is the labor for the interviewers who collect data from respondents (\$477,017). Data processing is \$300,620 and instrument review, cognitive testing, and programming of the CAPI instruments is \$185,299.

The table below details estimated costs to BJS, the total estimated Census costs, and the total estimated costs to the federal government per ITS.

<b><i>Estimated costs for each iteration of the Identity Theft Supplement to the NCVS</i></b>	
BJS costs	
Staff salaries	
GS-13 Statistician (15%)	\$14,245
GS-14 Statistician (10%)	\$12,976
GS-15 Supervisory Statistician (3%)	\$4,208
GS-15 Chief Editor (3%)	\$4,208
Other Editorial Staff	\$2,100
Front-Office Staff (GS-15 & Directors)	\$1,100
Subtotal salaries	\$38,837
Fringe benefits (28% of salaries)	\$10,874
Subtotal: Salary & fringe	\$49,711
Other administrative costs of salary & fringe (15%)	\$ 7,457
Subtotal: BJS costs	\$57,168
Census costs	
Staff, survey instrument development, interviewer training, CAPI programming, software & hardware maintenance, interviewer costs, fringe benefits, and Census overhead)	\$962,936
<b>Total estimated costs for each ITS</b>	<b>\$1,020,104</b>

For the 2012 ITS, the National Institute of Justice (NIJ) of the U.S. Department of Justice bears \$50,000 of the ITS costs and the Office for

Victims of Crime (OVC) bears \$100,000 of the cost. BJS of the U.S. Department of Justice bears the remaining \$870,104 cost of the survey.

15. Reasons for Change in Burden

Not applicable.

16. Project Schedule

From September 1, 2011, the beginning of the project period, through the end of October, the Census Bureau conducted two rounds of nine cognitive interviews with the revised ITS survey instrument. The results of the cognitive interviews have been incorporated into the current draft of the instrument. The final report from the cognitive testing can be made available to OMB upon request.

From the point of OMB approval of the instrument through May of 2012, Census will develop and test the CAPI instrument to ensure that it functions as designed and that all survey skip patterns have been properly programmed. This testing will be done in consultation with BJS. By early June of 2012, Census will develop and distribute all training materials to their field representatives. Interviewing for the 2012 ITS will be conducted during July through December 2012 by the Census Bureau field representatives. Processing of the data will take place on an ongoing basis between August 2012 and March 2013. Computer-based clerical editing and coding, if required, will be completed by March 2013 and the computer processing, editing, imputation, and weighting of the data will be completed by the end of April 2013. The Census Bureau will prepare and deliver a 2012 NCVS/ITS micro-data user file and accompanying file documentation to BJS by June 2013. The dates expressed above are good faith estimates and are subject to change.

The BJS will be responsible for the statistical analysis and publication of the data from the 2012 ITS. BJS will produce a report examining the prevalence and nature of identity theft victimization by the fourth quarter

of 2013. The report will contain similar analyses to the report produced from the 2008 ITS.<sup>h</sup> Key estimates to be presented include:

- the prevalence of identity theft victimization;
- the type of misuse of personal information experienced by identity theft victims;
- the financial losses associated with an incident of identity theft, by type of theft;
- the psychological and physiological consequences of identity theft victimization;
- the percentage of victims who reported to the police or a credit bureau, by type of theft;
- the amount of time spent resolving the problems caused by the victimization, by type of theft;
- and the types of behaviors that victims and non-victims engage in to prevent future identity theft victimization.

The data will be archived for public download and use at the University of Michigan Inter-university Consortium for Political and Social Research (ICPSR) immediately following the publication of the BJS report.

A similar timeline of data collection and dissemination will be followed for the 2014 ITS. However, Census will not have as much of the upfront work to do for the 2014 ITS that will be done for 2012. The instrument will already be tested and programmed for CAPI. Census will provide training materials to the field representatives by early June of 2014 and the 2014 ITS will be administered from July through December of 2014. Census will complete any final editing and coding by March of 2015 and will prepare and deliver the micro-user data file and documentation to BJS by June of 2015.

The BJS will then produce another report on person-level identity theft victimization by the fourth quarter of 2015. In addition to the key estimates presented in the 2012 report, the 2014 report will also contain year-to-year comparisons of the 2012 and 2014 data.

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<sup>h</sup> The report *Victims of Identity Theft, 2008* is available at <http://bjs.ojp.usdoj.gov/index.cfm?ty=pbdetail&iid=2222>.

17. Request to Not Display Expiration Date

N/A.

18. Exceptions to the Certification

N/A. There are no exceptions to Certification for Paperwork Reduction Act Submissions. Collection is consistent with the guidelines in 5 CFR 1320.9.

**C. Attachments**

Attachment 1: Identity Theft Supplement to the NCVS survey instrument (A1.its12.pdf)

Attachment 2: BJS authorizing statute; Title 42, United States Code, Section 3732 (A2.bjslegauth.doc)

Attachment 3: *Victims of Identity Theft, 2008* (A2.vit08.pdf)

Attachment 4: Document detailing changes to the ITS instrument from 2008 to 2012 (A4.changes.pdf)

Attachment 5: Census Bureau introductory letter for new households (A5.NCVS-572(L).pdf)

Attachment 6: Census Bureau introductory letter for reinterview households (A6.NCVS-573(L).pdf)