

SUPPORTING STATEMENT – PART A
U.S. Department of Commerce
U.S. Census Bureau
2018 Survey of Compact of Free Association (COFA) Migrants
OMB Control Number 0607-XXXX

A. Justification

1. Necessity of Information Collection

The U.S. Census Bureau is requesting approval to conduct a survey of the residents of Guam and the Commonwealth of the Northern Mariana Islands (CNMI) as a means to estimate the stock of qualified nonimmigrants (also referred to as Compact of Free Association (COFA) migrants) from the Republic of the Marshall Islands, the Federated States of Micronesia, and the Republic of Palau in 2018. According to the COFA Amendments Act of 2003, a qualified nonimmigrant (COFA migrant) is defined as “... a person, or their children under the age of 18, admitted or resident pursuant to section 141 of the US-RMI or US-FSM Compact or section 141 of the Palau Compact who, as of a date referenced in the most recently published enumeration is a resident of an affected jurisdiction.” (Public Law 108-188, Sec. 104 (e) (2) (B)).

COFA is a joint congressional-executive agreement that states that the United States will provide funds to Guam, CNMI, Hawaii, and American Samoa for a range of development programs and other benefits that are necessary due to the in-migration of citizens from the Republic of the Marshall Islands, the Federated States of Micronesia, and the Republic of Palau. COFA became effective for citizens of the Republic of the Marshall Islands and the Federated States of Micronesia in 1986, and for citizens of the Republic of Palau in 1994.

The COFA Amendments Act of 2003 introduced the requirement for an enumeration of COFA migrants to be conducted no less frequently than every five years in Guam, CNMI, Hawaii, and American Samoa. In accordance with the COFA Amendments Act of 2003, the U.S. Department of the Interior, Office of Insular Affairs requested the U.S. Census Bureau to produce estimates of such COFA migrants for 2018.

2. Needs and Uses

The COFA Amendments Act of 2003 appropriated \$30,000,000 annually in funding “to aid in defraying costs incurred by affected jurisdictions as a result of increased demands...due to the residence in affected jurisdictions of qualified nonimmigrants from

the Federated States of Micronesia, the Republic of the Marshall Islands, and the Republic of Palau.” The “affected jurisdictions” in the COFA Amendments Act of 2003 are American Samoa, CNMI, Guam, and Hawaii. To assist in the distribution of funds, an enumeration of the jurisdictions that are affected must be done no less frequently than every five years.

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.

3. Use of Information Technology

The mode of data collection will be in-person interviews using paper forms, limiting the use of information technology. The cost of using information technology is not justified because of the limited amount of data to be collected and processed.

4. Efforts to Identify Duplication

The information collected in the 2018 Survey of Compact of Free Association (COFA) Migrants is unduplicated. Field enumeration will be required for CNMI (Saipan) and Guam since the Census Bureau has no other reliable up-to-date demographic data source for these areas beyond the 2010 Decennial Census. For Hawaii special tabulations on a three-year average of results from 2015 to 2017 American Community Survey (ACS) data will be used to create COFA migrant estimates. The 2010 Decennial Census results will be used as estimates of the 2018 counts for American Samoa and CNMI’s Rota and Tinian islands. It would not be cost effective to conduct an independent survey in these areas due to the low numbers of COFA migrants as indicated by the 2010 Decennial Census and the negligible impact these low numbers will have on the overall distribution of the \$30 million in Compact funds.

5. Minimizing Burden

The survey will be administered to households in Guam and CNMI (Saipan). To minimize burden, existing data sources of the ACS and the 2010 Decennial Census are used to estimate the number of COFA migrants from the Republic of the Marshall Islands, the Federated States of Micronesia, and the Republic of Palau living in Hawaii and American Samoa, respectively. In addition, the 2010 Decennial Census will be used to estimate the number of COFA migrants living in CNMI’s Rota and Tinian islands.

Given the relatively large number of COFA migrants residing in Guam and CNMI (Saipan), it is necessary to conduct independent surveys in these jurisdictions to obtain the information to fulfill the required enumeration. Only those questions that meet the needs of the law and allow for the identification of duplication or falsification are included in the survey.

6. Frequency of Collection

The COFA Amendments Act of 2003 stipulates that the qualified nonimmigrant population has to be enumerated no less frequently than every five years; thereby requiring recently collected data to be available to serve as a basis for the estimate of these populations.

7. Special Circumstances

This information collection will be conducted in a manner consistent with the Office of Management and Budget (OMB) guidelines and there are no special circumstances.

8. Consultations Outside the Agency

On October 25, 2017, the Census Bureau published a notice in the Federal Register (82 FR pages 49313-49314) inviting the general public and other Federal agencies to comment on the necessity, content and scope of the data collection plans. No public comments were received in response to the notice.

In addition, the Census Bureau has met with Tanya Harris Joshua, Deputy Policy Director, and Wali Osman, Economist, from the Department of the Interior, Office of Insular Affairs on several occasions to discuss the content and methodology to be used to fulfill the requirements outlined in the Compact of Free Association Amendments Act of 2003.

9. Paying Respondents

No payments or gifts are given to respondents of the survey.

10. Assurance of Confidentiality

Census Bureau provides respondents with assurance that it will keep their reported data confidential. The following statement is taken directly from the FAQs (see Attachment A): "The U.S. Census Bureau is required by law to keep your information confidential

(Title 13, United States Code, Section 9). The Census Bureau is not permitted to publicly release your responses in a way that could identify you or this household. Your information may only be shared with other Census Bureau staff for the work-related purposes identified and as identified in the Privacy Act System of Records Notice COMMERCE/Census-3, Demographic Survey Collection (Census Bureau Sampling Frame). Per the Federal Cybersecurity Enhancement Act of 2015, your data are protected from cybersecurity risks through screening of the systems that transmit your data. By law, the Census Bureau can only use your responses to produce statistics.”

Additionally, the following statement is taken directly from the invitation letter for the survey (see Attachment B) and the notice of visit letter (see Attachment C): “The U.S. Census Bureau is required by law to keep your information confidential (Title 13, United States Code, Section 9). The Census Bureau is not permitted to publicly release your responses in a way that could identify you or this household. Per the Federal Cybersecurity Enhancement Act of 2015, your data are protected from cybersecurity risks through screening of the systems that transmit your data. By law, the Census Bureau can only use your responses to produce statistics.”

11. Justification for Sensitive Questions

The survey does not include questions of a sensitive nature.

12. Estimates of Annualized Respondent Hour and Cost Burden

The Census Bureau expects a sample size of 7,100 households who will be interviewed for the survey (see Attachment D). The Census Bureau estimates that the questionnaire will require 20 minutes to complete for the average household in Guam and CNMI. Reinterviews (see Attachment E) for quality control purposes will be conducted for approximately 700 cases. Reinterviews should take no more than 7 minutes.

7,100 x 20 minutes per response = 2,367 burden hours
700 x 7 minutes per response = 82 burden hours

The burden for the entire operation is estimated to be 2,449 hours. This estimate covers the amount of time for respondents to complete the survey, including the time for reviewing the instructions and answers. The actual burden will vary from respondent to respondent depending on the number of people living in the household and the ease of responding. The estimated cost to the public is \$42,368, based on an estimated reporting burden of 2,449 hours and estimated hourly cost of \$17.30

(https://www.bls.gov/oes/current/oes_gu.htm#00-0000; May 2017 mean hourly wage for

all occupations in Guam, latest figure available from Bureau of Labor Statistics. No data available for CNMI.)

13. Estimate of Cost Burden

There is no cost to respondents other than their time to complete the survey.

14. Cost to Federal Government

The cost for the 2018 Survey of Compact of Free Association (COFA) Migrants conducted in Guam and the Commonwealth of the Northern Mariana Islands is projected to be approximately \$1.49 million, funded by the Office of Insular Affairs, U.S. Department of the Interior. The cost consists of \$1.48 million for salaries and related overhead and \$10,000 for printing and shipping of materials.

15. Reason for Change in Burden

This is a new data collection.

16. Project Schedule

The data from this survey will be used to estimate the number of COFA migrants in Guam and CNMI. These estimates will be delivered to the sponsor of the survey Department of the Interior, Office of Insular Affairs in a report. The report will also include estimates of the number of COFA migrants in Hawaii (based on 2015-2017 American Community Survey data) and in American Samoa (based on 2010 Decennial Census data). These estimates will be used by Department of the Interior, Office of Insular Affairs to allocate the appropriated \$30 million annually in funding “to aid in defraying costs incurred by affected jurisdictions as a result of increased demands...due to the residence in affected jurisdictions of qualified nonimmigrants from the Federated States of Micronesia, the Republic of the Marshall Islands, and the Republic of Palau.” The “affected jurisdictions” in the COFA Amendments Act of 2003 are American Samoa, CNMI, Guam, and Hawaii. To assist in the distribution of funds, an enumeration of the jurisdictions that are affected must be done no less frequently than every five years.

A milestone schedule for key survey activities is as follows:

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| July 9, 2018 | Survey fieldwork begins with listing operation |
| September 28, 2018 | Fieldwork completed |
| November 2, 2018 | Data processing completed |

December 21, 2018 Final tables/report approved by Sponsor

17. Display of OMB Approval Information

The expiration date will appear in the respondent invitation letter, FAQs, and notice of visit given to all households at the commencement of the survey and on the questionnaire.

18. Exceptions to the Certification

The collection of information for the survey complies with 5 CFR 1320.9 without exception.