Attachment C-1

Public Comment (Reamer) Received in Response to Federal Register Notice

From: Andrew Reamer

To: Coleman-Jensen, Alisha - REE-ERS, Washington, DC

Cc: Sivinski, Robert G. EOP/OMB; Nerino, Anthony Jr. EOP/OMB; Leslie, Kerrie L. EOP/OMB; Weidman, Pheny - REE-

ERS, Washington, DC

Subject: Re: [External Email]Re: [EXTERNAL] Re: [External Email]Request for draft copy of ICR -- Current Population

Survey Food Security Supplement (OMB # 0536-0043)

Date: Tuesday, September 21, 2021 6:14:54 PM

Terrific -- just what I was looking for. Thanks very much, Alisha.

Andrew

On Mon, Sep 20, 2021 at 4:24 PM Coleman-Jensen, Alisha - REE-ERS, Washington, DC <alisha.coleman-jensen@usda.gov> wrote:

Hello Andrew,

I am certainly happy to share the draft instrument for the CPS Food Security Supplement. Please see attached pdf (labeled test questionnaire). Differences from the current instrument are highlighted in yellow. This is the draft instrument we plan to use after the renewal. The only planned change ERS is proposing is the revised instrument.

This draft instrument was previously submitted to OMB and ERS had received approval for and sponsored a test data collection as part of the September 2020 CPS. The attached updated instrument was used for that test data collection so that we could examine any impacts on responses before using the new instrument in our regular December CPS Food Security Supplement data collection.

I am also including the supporting statements we submitted in 2020 to receive approval for the test data collection. These documents discuss the updated instrument that we expect to use for future data collections. Finally, I am including Census' recommendations for the updated questionnaire based on cognitive testing.

This information is also available on the web, here: https://www.reginfo.gov/public/do/PRAViewIC?ref nbr=202004-0536-001&icID=241357

You can find previous ICR packages submitted for the CPS Food Security Supplement here: https://www.reginfo.gov/public/do/PRAOMBHistory?ombControlNumber=0536-0043

Please do let me know if you have any questions about these documents.

Thanks,
Alisha
From: Andrew Reamer <areamer@gwu.edu> Sent: Monday, September 20, 2021 8:55 AM To: Sivinski, Robert G. EOP/OMB Robert_G_Sivinski@omb.eop.gov Cc: Coleman-Jensen, Alisha - REE-ERS, Washington, DC alisha.coleman-jensen@usda.gov; Nerino, Anthony Jr. EOP/OMB Anthony.Nerino2@omb.eop.gov; Leslie, Kerrie L. EOP/OMB Kerrie.L.Leslie@omb.eop.gov> Subject: [External Email]Re: [EXTERNAL] Re: [External Email]Request for draft copy of ICR Current Population Survey Food Security Supplement (OMB # 0536-0043)</areamer@gwu.edu>
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Thanks very much for the clarification, Bob. Per your guidance, I hope to receive draft ICR materials from ERS on the Food Security Supplement soon.
Sincerely,
Andrew
On Mon, Sep 20, 2021 at 8:16 AM Sivinski, Robert G. EOP/OMB < Robert G Sivinski@omb.eop.gov > wrote:
Hello All,
I'm adding Anthony Nerino, the OMB desk officer for ERS collections.

During the 60-day comment period the agency (ERS) should provide on request enough detail for the public to meaningfully comment on the proposed collection. For example, the agency should provide a draft instrument so the public can evaluate burden and a draft statement of how the information will be used (typically a previous supporting statement will work) so the public can comment on whether the collection is necessary for the proper performance of the agency.

Hope this helps,

Bob

From: Andrew Reamer < areamer@gwu.edu > Sent: Sunday, September 19, 2021 9:26 AM

To: Coleman-Jensen, Alisha - REE-ERS, Washington, DC <a lisha.coleman-

<u>iensen@usda.gov</u>>

Cc: Sivinski, Robert G. EOP/OMB < <u>Robert G Sivinski@omb.eop.gov</u>>; Leslie, Kerrie L. EOP/OMB < <u>Kerrie.L.Leslie@omb.eop.gov</u>>

Subject: [EXTERNAL] Re: [External Email] Request for draft copy of ICR -- Current

Population Survey Food Security Supplement (OMB # 0536-0043)

Dear Alisha,

Your observation that ICR packages are publicly released only after approval from OMB is not correct. Such an approach would be at odds with the PRA's aim to encourage public comment on agency proposals for information collection. It is difficult for the public to provide useful, cogent comments in the absence of information regarding ERS plans for the 2022 CPS Food Security Supplement.

On behalf of the AEA membership, I request copies of draft ICRs about 5 times a week -most agencies provide them if they are available. Among statistical agencies, Census and
BLS usually send draft ICR materials within a day or two. If they are delayed, they let me
know. Several agencies, such as the Federal Reserve and the Centers for Medicare and
Medicaid Services, post each draft ICR on the web. See

>https://www.federalreserve.gov/apps/reportforms/review.aspx<

and > https://www.cms.gov/Regulations-and-

Guidance/Legislation/PaperworkReductionActof1995/PRA-Listing<

I'll ask OMB/OIRA statistical agency desk officers Bob Sivinski or Kerrie Leslie, cc'd

here, to provide you with more specific guidance regarding agency options for responding to requests from the public for a draft ICR in response to a 60-day FRN. As the recent ERS FRN is silent on the matter, at a minimum I wish to be able to tell AEA members if and how the 2022 Food Security Supplement content and methodology will differ from the December 2020 version per >https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202004-0536-001<.

the December 2020 version per >https://www.reginfo.gov/public/do/PRAViewICR? ref_nbr=202004-0536-001<.
I look forward to learning more about ERS plans for the 2022 Food Security Supplement
Sincerely,
Andrew
On Tue, Sep 14, 2021 at 9:29 AM Coleman-Jensen, Alisha - REE-ERS, Washington, DC alisha.coleman-jensen@usda.gov wrote:
Dear Dr. Reamer,
Thank you for your inquiry. ICR packages are released to the public via the OMB's reginfo.gov portal once they receive OMB's approval/denial. Members of the general public can access them through this website. We are inviting the public to comment of the following four areas:
(a) Whether the proposed collection of information is necessary for the proper performance of the functions of the Agency, including whether the information will have practical utility;

(b) the accuracy of the Agency's estimate of the burden of the proposed collection of

(c) ways to enhance the quality, utility, and clarity of the information to be collected;

(d) ways to minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

information, including the validity of the methodology and assumptions used;

Thank you,

From: Andrew Reamer < areamer@gwu.edu > Sent: Friday, September 10, 2021 6:01 PM

To: Coleman-Jensen, Alisha - REE-ERS, Washington, DC <alisha.coleman-

jensen@usda.gov>

Subject: [External Email]Request for draft copy of ICR -- Current Population Survey

Food Security Supplement (OMB # 0536-0043)

[External Email]

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Dear Ms. Coleman-Jensen,

On behalf of the American Economic Association, I request a copy of the draft ICR for the Current Population Survey Food Security Supplement (OMB # 0536-0043), as invited by today's FRN. I will post the draft ICR materials on EconSpark for review by AEA members. Thanks very much and I look forward to receiving available materials, including any draft Supporting Statement.

Sincerely,

Andrew Reamer

Research Professor

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