



February 7, 2022

Comments to the Office of Management and Budget (OMB)

Re: Census Bureau's Ask U.S. Panel, Federal Register Notice

[86 FR 69220 \(Pages 69220-69221\) \(Document Number 2021-26515\)](#)

On behalf of the Insights Association (IA), the leading nonprofit trade association for the market research and data analytics industry, I am respectfully submitting comments on the U.S. Census Bureau's planned Ask U.S. Panel.

IA defends and promotes the indisputable role of insights in driving positive impacts on society and consumers. Our more than 7,000 company and individual members are the world's leading producers of intelligence, analytics and insights defining the needs, attitudes and behaviors of consumers, organizations and their employees, students and citizens. With that essential understanding, leaders can make intelligent decisions and deploy strategies and tactics to build trust, inspire innovation, realize the full potential of individuals and teams, and successfully create and promote products, services and ideas.

The Census Bureau solicited public comments on its proposed "Ask U.S. Panel," which is being developed by the Bureau through a cooperative agreement to track public opinion on topics of interest to federal agencies and their partners, and to conduct experimentation on question wording and methodological approaches. The goal of the Federal Register Notice is to: *"a) Evaluate whether the proposed information collection is necessary for the proper function of the Department/Bureau, including whether the information will have practical utility; b) Evaluate the accuracy of [the] estimated time and cost burden for this proposed collection, including the validity of the methodology and assumptions used; c) Evaluate ways to enhance the quality, utility and clarity of the information to be collected; and, d) Minimize the reporting burden on those who are to respond, including the use of automated collection techniques or other forms of information technology."*

Unfortunately, the proposed plan for the Census Bureau to develop a probability-based research panel would be duplicative, at best; numerous private sector insights companies and organizations already provide well-established high-quality probability-based panels. The Bureau's plan is also anti-competitive, given these existing panels and the Bureau's intent to fund an additional insights firm to build one.

The stated goal of the proposal -- to create a probability-based nationwide representative survey panel for tracking public opinion -- is already being fulfilled utilizing numerous non-governmental

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sources. Insights providers such as Ipsos, NORC at the University of Chicago, Dynata, SSRS, Gallup and others maintain probability-based research panels that could meet any needs of the Bureau or other federal agencies. Plenty of other insights companies and organizations with panels could provide probability-based panels if requested. Since these insights providers offer their services commercially on the open market, the Census Bureau could acquire such panel research services with full and open competitions. So why does the Bureau feel the need to disregard the availability of ready commercial alternatives and develop its own panel? The insights providers mentioned above have already provided similar probability-based panel research resources to numerous federal agencies, including the Census Bureau.

The respondent burden from the Bureau proposal will be unnecessarily high. As already stated, there are numerous non-governmental alternatives available in the market today, engaging with research subjects across the country in support of private and public-sector clients. A duplicative research panel created by the Census Bureau would impose undue burdens on the American public when they are already participating in private-sector panels.

The development of a research tool by the federal government to meet needs that can and are already being satisfied by insights providers outside of the federal government also presents an unnecessary financial cost to American taxpayers. Besides just the cost and expertise involved in establishing the Ask U.S. Panel, the Census Bureau has not fully considered the immense expertise in data quality, incentive management and delivery, fraud detection, and privacy and permissions management required to successfully maintain this kind of panel. Why should taxpayers fund the creation and complicated maintenance of such a duplicative service?

Finally, according to the original Notice of Federal Funding,¹ the Ask U.S. Panel would be "open to government and other non-profit researchers and policy makers," meaning that the Bureau's proposed panel would potentially compete directly with private sector insights providers. Since 1955, federal agencies have been charged with avoiding "activities conducted by the Government that provide services or products for its own use which could be procured from private enterprise through ordinary business channels".² The policy required the head of an agency to make any exception to such restrictions "only where it is clearly demonstrated... that it is not in the public interest to procure such product or service from private enterprise." This policy was reiterated by every Administration following, including in OMB Circular A-76³ and other policies specifically requiring competitive sourcing. The Ask U.S. Panel proposal would take the federal government in the wrong direction, insourcing a pre-existing commercial activity.

We applaud the Census Bureau for their ongoing innovation and dedication to serve as the leading source of the highest quality and most representative data for the nation's people and economy. However, the Insights Association is gravely concerned about the rationale and need for the Ask U.S. Panel given numerous commercially-viable alternatives. The Census Bureau would be better

¹ CENSUS-ADR-ADRM-2020-2006579. U.S. Census Bureau Research and Methodology Directorate Cooperative Agreements. Department of Commerce. Page 10. <https://www.grants.gov/web/grants/search-grants.html?keywords=CENSUS-ADR-ADRM-2020-2006579>

² Bureau of the Budget Bulletin 55-4. January 15, 1955. <https://www.governmentcompetition.org/wp-content/uploads/2018/11/Bureauof the Budget Bulletin 55-4 January 15 1955.pdf>

³ <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/circulars/A76/a076.pdf>

served using the competitive marketplace of available insights services to acquire pre-existing probability panel data on an as-needed basis, which would reduce public burden and ultimately cost taxpayers less money.

Sincerely,

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