

March 29, 2022

Sheleen Dumas
Departmental PRA Officer
Office of the Chief Information Officer
Commerce Department
14th and Constitution Avenue NW Washington, DC 20230

Submitted via the following website: www.reginfo.gov/public/do/PRAMain

RE: Comments on Proposed Information Collection on Ask U.S. Panel

Dear Ms. Dumas:

The National Opinion Research Center at the University of Chicago (NORC) is an objective non-partisan research institution that delivers reliable data and rigorous analysis to guide critical programmatic, business, and policy decisions. Utilizing our well-established surveys, we have been successful in collecting reliable data for federal agencies, private sector clients and others for over 75 years. This includes the “AmeriSpeak” online probability-based panel for rapid turnaround studies, which has been in place since 2016.

The U.S. Census Bureau (Bureau) is soliciting 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 (FRN) is to allow for the additional 30-day comment period required under the Paperwork Reduction Act (PRA) and follows the previously provided 60-day comment period on December 7, 2021.

NORC appreciates the opportunity to comment on this proposed collection. However, we continue to have concerns on several levels regarding the development of this panel and believe that the PRA package that accompanies this FRN does not adequately address our previously provided (February 4, 2022) comments. In short, the project described in the FRN is duplicative of surveys that already exist in the private sector; misjudges the methodological complexity of a robust panel design; and underestimates the associated costs and burden on the public. These concerns call into question the need for the Ask U.S. Panel as a government-developed program and its associated increase to respondent burden.

These concerns are described in more detail below, including comments in response to the PRA package.

As proposed, the Ask U.S. Panel is duplicative of multiple similar products already available in the marketplace and from which it could obtain similar products and services at significantly lower cost and on a more immediate timeframe. We note that the types of surveys the Bureau appears to be developing through its cooperative agreement are already offered by multiple companies – including the probability-based panels developed and maintained by Ipsos, Gallup, and NORC independently – and such studies may be purchased for as little as \$100,000. The use of a probability-based nationwide nationally representative panel for tracking public opinion would add value to government programs. However, this function exists in the private sector and is readily available at a significantly reduced cost (as the government would pay only for the marginal costs associated with the specific studies and not the costs associated with the development, maintenance, and support of a panel). Accordingly, the Bureau is investing resources to acquire access to services that are more efficiently obtained at a competitive price in the commercial marketplace.

We recognize that the Bureau attempts to address this concern on pages 3, 8, and 9 of Supporting Statement A, stating (page 3): “Existing commercial online panel alternatives typically fail to meet Office of Management and Budget (OMB) standards for transparency, which require sufficient detail on data collection and estimation methods to allow reproducibility, and sufficient detail on data quality and representativeness to enable OMB to evaluate the fitness for purpose.” The Bureau further states (pages 8-9): “Several commenters suggested that the current effort is duplicative of existing products in the marketplace. According to OMB, existing commercial online panel alternatives typically fail to meet OMB’s standards for transparency, which require sufficient detail on data collection and estimation methods to allow reproducibility, and sufficient detail on data quality and representativeness to enable OMB to evaluate the fitness for purpose. This panel is not duplicative of existing commercial online panel alternatives, since it is being designed in a manner that will meet OMB’s standards for transparency by providing sufficient detail on data quality and representativeness to enable OMB to evaluate fitness for purpose.”

NORC contends that the development of this panel *is* duplicative with similar products already developed and available in the marketplace. The NORC AmeriSpeak panel has been specifically designed to meet the needs of federal agencies and has been successfully used for more than a dozen data collections, in eleven federal agencies, across nine departments – all with approval by OMB over the past 5 years. Our products, methodological statements, and documentation all meet or exceed the transparency requirements and are released with a co-branding by the AAPOR Transparency Initiative. An example of the documentation provided with an AmeriSpeak study for a federal client is included as Attachments A and B. Moreover, AmeriSpeak annually publishes an updated technical document¹ on sampling and other panel recruitment procedures used in constructing AmeriSpeak and provides complete documentation² on the protection of the rights of human subjects for institutional review board review.

In addition, we again comment that OMB Circular A-76 requires federal agencies to conduct an assessment of whether an activity is inherently governmental or commercial. Given that there are existing panels in the private sector, and that the Bureau has previously used similar services, more information is needed to better understand the determinants of the cost comparison analysis conducted and the rationale for the determination that this work is inherently

¹ See [AmeriSpeak Technical Overview 2019 02 18.pdf \(norc.org\)](#) for more information.

² See [NORC AmeriSpeak Information for IRBs 2016 10 18.pdf](#) for more information.

governmental and should no longer be completed with the existing offerings in the marketplace. Our previously provided comment was not addressed in the PRA package submitted.

On page 5 of Supporting Statement A, the Bureau attempts to address the issue of duplication by stating: "This research does not duplicate any other data collection or research being done by the Bureau or other Federal agencies. The purpose of this clearance is to stimulate research, which would not be done under other circumstances due to time constraints." As discussed above, we contend that the development of this panel is duplicative of similar products already developed and available in the marketplace. The Bureau discounts the range of products currently available in the market when they restrict their response to that of only Federal agencies. Furthermore, the Bureau's comment that this research could not be done under other circumstances due to time constraints is a false assertion as we have demonstrated above that existing services in the marketplace could be utilized quickly. Utilizing existing services could save the federal government the time and costs associated with development and provide the needed research within weeks as opposed to the years that will be lost by the government in development of this product.

The methodology being implemented by the Bureau is evolving, and more work will be needed to ensure the validity of the methodology and the utility of the proposed data collection. Over recent years the Bureau has undertaken an approach of rapid implementation of new data products and data collection programs. We applaud the Bureau's recent innovations in these areas but suggest that caution and more work may be necessary to ensure the resulting data products meet its intended use. The Bureau should also be more transparent with its users on the best fit for each of its products. Recent Bureau experiences, the Bureau's public presentations on the Ask U.S. Panel, and this PRA package indicate that the methodology is rapidly evolving. Given these changes it remains unclear whether the distinctions needed to ensure a quality product that is used appropriately are ready or available.

In response to our February 4, 2022 comment, the Bureau states on page 9 of Supporting Statement A: "Several commenters noted that 'the methodology being implemented by the Bureau is evolving, and more work will be needed to ensure the validity of the methodology and the utility of the proposed data collection.' The Bureau agrees, thus the plans to complete the Pilot study. Very detailed methodology for the pilot is specified in this package." We appreciate the detailed information that is provided in Supporting Statement B and remain concerned about the rapid evolution and shifting design of this project since its inception in 2020. This project continues to evolve from a year 1 design phase to now a multi-year pilot. The continuous shifts and expansion in both design and methodology demonstrate that more work is needed upfront. This additional work would enable the Bureau to fully understand the complexities associated with designing, building, and maintaining a robust probability panel collection that will meet the needs of federal agencies. Without a solid foundation, the Bureau risks developing a product that fails to meet its needs at significant expense to the taxpayer. With the information provided in Supporting Statement B, the Bureau creates the perception of transparency with this PRA package but does not provide enough information to adequately assess the quality of the project or to enable the public to fully comment.

For example, Supporting Statement B is silent on the actual number of interviews that will be supported for any future "Topical Surveys." While the statement forecasts that the pilot study will yield "approximately 1,500 enrolled panelists," Supporting Statement B does not forecast the actual interviewing capacity which will result from the pilot study. The following stage of

empanelment involves the completion of an actual substantive survey, overcoming endemic non-response caused by panelists “backing out” after the recruitment survey. Back-out rates in probability panels can be 30 percent or more, with the implication that the actual Ask U.S. Panel interviewing capacity will be on the order of approximately 810 participating households supporting 1,080 completed “Topical Surveys.” This estimate of interview capacity does not take into account panel attrition that occurs monthly.

In addition, Supporting Statement B has a potentially unrealistic forecast of the sample performance rate from the Phase 1 initial recruitment for the household pilot study. Supporting Statement B forecasts that 10.6 percent of the invited ABS-sourced household units will produce at least one adult completing the baseline recruitment survey. The 10.6 percent assumption is substantially higher than the approximate 5 percent rate experienced by AmeriSpeak in recent years. The basis of our critique is that the pilot study does not plan to use outbound, telephone interviewing (CATI) for prompting sample units and for administering the baseline recruitment survey. NORC has found outbound telephone interviewing to be a substantial source of completed recruitment interviews for AmeriSpeak. Therefore, we question whether the pilot study can be approximately twice as effective as AmeriSpeak in terms of initial sample performance while not deploying a key contact and interviewing mode.

Supporting Statement B holds out the possibility that the Phase 2 Face-to-Face (FTF) recruitment methodology could be abandoned after the pilot study “if the NRFU is shown ineffective or cost prohibitive.” If the Bureau determines to use a single-stratum design post pilot (no FTF), the likely AAPOR response rate for the Ask U.S. Panel recruitment could be as low as 6 percent based on AmeriSpeak past performance for the non-NRFU initial recruitment). This figure compares unfavorably with the 34 percent weighted AAPOR response rate obtained by AmeriSpeak in those years where AmeriSpeak uses a two-stage design with FTF refusal conversion.³ AmeriSpeak’s methodological program has identified specific representation benefits of FTF recruitment.⁴ If the Bureau does retreat to single-stage design, there are known negative impacts on sample representativeness that will result.

Additionally, the FRN and the PRA package additionally specify the panel “may be used to collect national-representative rapid-respond data as a complement to that currently collected by the Household Pulse Survey.” This suggests a new use and purpose of the Ask U.S. Panel and points to the shifting and growing scope of the project. The rapid change and growth in scope further highlights the need for a robust design. It is important to note that while the Household Pulse Survey (HPS) was met with initial successes, there are potential shortcomings that need to be addressed and are not accounted for in the methodological statements provided in the PRA

³ See [AmeriSpeak Technical Overview 2019 02 18.pdf \(norc.org\)](#) for more information.

⁴ “The examination of both whole panel and sample composition for the AmeriSpeak case studies illustrate that overall, NRFU specifically improves representation among groups who are traditionally most reluctant to respond to surveys. These segments include younger individuals (age 18-34), Hispanics, persons without a high school degree or with a high school or equivalent degree (no college). It also aids inclusion of lower income, non-internet, and renter households.” See the AmeriSpeak white paper here: [Bilgen et al. WhitePaper1_NRFU_SampleComposition.pdf \(norc.org\)](#).

package. For example, recent analyses discussed in *Nature*,⁵ and *The Harvard Gazette*,⁶ indicate that the HPS significantly overestimated Covid-19 vaccine uptake by as much as 14 percentage points when compared to statistics compiled by the U.S. Centers for Disease Control and Prevention (CDC), which are based on data from multiple sources, including immunization information systems, the Vaccine Administration Management System, and direct data submission from federal agencies and pharmacies.⁷ This recent experience demonstrates the danger of rapidly implementing a program and the need for thoughtful and transparent discussion on the methodology. This suggests that more information from the Bureau is needed to better understand how the Ask U.S. Panel methodology is being further developed, and whether it is an effective approach for meeting its established goals.

The Bureau underestimates the respondent burden and cost estimates of the Ask U.S. Panel. In response to our previously submitted comments regarding respondent burden and the anticipated cost of the Ask U.S. Panel, the Bureau states (page 9, Supporting Statement A): “The pilot will produce specific data on recruitment rates and associated cost which will allow us to refine cost estimate and make design decisions for the panel.” We appreciate the attempt to address our comment, but the response is inadequate as it does not include the information necessary to provide transparency into the development of the current cost estimates for the pilot and anticipated full panel, nor does it provide transparency into the calculation of respondent burden. Based on our experience developing and maintaining panels of this type, the information provided underestimates both the burden on the public and the required costs to the taxpayer for the development and execution of this project. From our calculation, NORC estimates that it likely would cost at least \$25 million to build an online panel capable of meeting the stated goals in the FRN and PRA package, with annual maintenance being similarly expensive and could be as much as \$2 million per year.

Further, the information provided in Supporting Statement B is specific to the methodology and design of the pilot and no additional information was provided regarding the design and plans for maintenance of the panel – a key design consideration in the development of a robust, project like this. Because of this, it is not possible to understand whether the Bureau has adequately planned and budgeted for the costs and burden associated with this large-scale effort. Maintenance of a rigorous panel of this nature can be onerous, and it is not clear whether the mechanisms the Bureau has in place will successfully ensure adequate response through the duration of the panel. Nor is it clear how the pilot will inform the design on the planned procedures to monitor and mitigate panel attrition and what its approach to refreshing the panel respondents would involve. This could be perceived as a lack of understanding of the complexities associated with designing, recruiting, and retaining a panel of this size and complexity and is an underestimate of burden.

Lastly, a similar concern stems from the use of a cooperative agreement to fulfill this work. By using a cooperative agreement, under which the intellectual property developed is owned not by

⁵ Bradley, V.C., Kuriwaki, S., Isakov, M. *et al.* Unrepresentative big surveys significantly overestimated US vaccine uptake. *Nature* 600, 695–700 (2021). <https://doi.org/10.1038/s41586-021-04198-4>

⁶ Powell, Alvin, 2 Early Vaccination Surveys Worse Than Worthless Thanks to ‘Big Data’ Paradox, Analysts Say. *The Harvard Gazette*, December 8, 2021.

⁷ See <https://www.cdc.gov/vaccines/imz-managers/coverage/adultvaxview/pubs-resources/covid19-coverage-estimates-comparison.html> for more information.

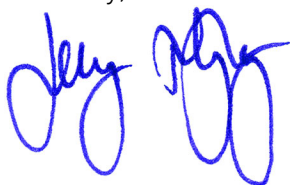
the federal government but by the awardee, the Bureau is using taxpayer funds to establish a panel that can be used by a company in the private sector for its own commercial use long after the work of the government is complete. As described in the Department of Commerce Financial Assistance Standard Terms and Conditions (December 26, 2014, § D.03.a), the awardee “owns any work produced or purchased under a Federal award.” Thus, any company entering into this agreement is free to continue to utilize the intellectual property developed under the cooperative agreement after the agreement expires. As such, it is unclear to us whether the goals of the PRA to minimize the public’s reporting burden are in fact being upheld throughout the existence of the panel proposed by the Bureau, particularly when, as discussed above, similar probability-based panels are already available to the government at reasonable cost. Also, it is not clear whether the government’s use of this proposed panel would indeed be a best value approach to this work by the Bureau and other federal agencies. This comment was not addressed in the posted PRA package.

Conclusion. While the Bureau is to be lauded for its recent innovations, this announcement raises serious concerns regarding the duplication of surveys that already exist in the private sector; misjudgment of the methodological complexity; and underestimation of the associated costs and burden on the public. These concerns question the need for the Ask U.S. Panel as a government developed program.

We respectfully suggest that the Bureau consider whether existing products in the marketplace more effectively meet the needs of the Bureau and its partners. If the Bureau decides to continue, we encourage it to be fully transparent on how future iterations of this product are designed and developed in a way that is consistent with the brand of the Bureau for high quality data and to take necessary steps to decrease respondent burden. The high profile of products from the federal statistical system requires the Bureau to proceed at a pace that ensures a thoughtful, transparent, and well-designed program be developed. Failure to do so could call into question the accuracy not only of Bureau data, but that of its partner federal agencies.

Thank you for the opportunity to offer comments on the Ask U.S. Panel. If you have any questions about these comments, please contact me at 301-634-9413 or telgarsky-jeffrey@norc.org.

Sincerely,



Jeffrey Telgarsky
Executive Vice President for Research

Attachment A:
AmeriSpeak NORC Card

Attachment B:
AmeriSpeak Project Report