Comments to the Generic Clearance for 2030 Census Small-Scale Tests, Evaluations, and Database Updates

This public comment is submitted on behalf of Reveal Global Consulting, LLC. Reveal Global Consulting, LLC, is an 8(a) certified small business specializing in data management, analysis, and strategic solutions for local, state, and federal U.S. government and corporate clients. Reveal Global Consulting, LLC, has supported Census projects through tailored solutions that leverage their expertise in machine learning, artificial intelligence, deep learning, and analytics process automation. Our expertise in managing large-scale data initiatives allows us to contribute valuable insights into the Census Bureau's efforts to improve information collection, especially in data collection activities to refine procedures for the 2030 Census programs.

Our public comment addresses the Federal Register Notice (Document Number: 2024-20547): Generic Clearance for 2030 Census Small-Scale Tests, Evaluations, and Database Updates. We seek to provide suggestions on methods enhancing the quality, utility, and clarity of the methodology and assumptions being used and methods of minimizing the response burden on those who are to respond. Our comment is under the assumption that response burden refers to the time, effort, and resources that individuals or entities must expend to complete information collection requests (ICRs) made by federal agencies, including total hours required to respond to surveys, forms, or other data collection efforts, as well as associated costs such as the value of the respondents' time and additional resources that may need to allocate to fulfill these requests.[1]

Enhancing Quality, Utility, and Clarity of Methodology

Applying quality metrics across the survey lifecycle ensures each stage contributes to producing accurate, relevant, and reliable data, enhancing quality, utility, and clarity of methodology. Integrating these metrics allows for continuous monitoring, targeted improvements, and adaptability, especially for complex data needs like Census operations. Since small-scale tests often focus on usability, response accuracy, and efficiency, applying Fricker and Tan's framework can systematically evaluate quality issues and enhance planning for larger-scale Census efforts. Our suggestion is to ensure that all small-scale tests work toward collecting data that support the quality metrics mentioned in this section.

1. **Design Phase**

Addressing quality issues early in the design phase reduces respondent confusion and improves response rates, setting a strong foundation for "fitness for use." This ensures that the survey design aligns with its primary goals by creating clear, relevant questions from the outset.

Metrics: Coverage, relevance, and construct validity are essential in this phase, often measured through cognitive testing and piloting. For instance, construct validity checks ensure questions accurately capture intended concepts, while relevance metrics help verify that questions align with user needs.

2. **Testing and Pre-Collection**

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[1] https://www.gao.gov/assets/d18381.pdf#page=13

Pre-testing in this phase is vital for identifying obstacles that could lead to data gaps later on. It is cost-effective, saving resources by verifying that questions and survey structures are appropriate for broader applications before full deployment.

Metrics: Key pre-collection metrics include nonresponse and completion rate simulations, which predict potential nonresponse issues. Conducting small-scale pilots also allows monitoring of respondent behavior, completion rates, and identification of challenging questions or sensitive topics.

3. Collection Phase

The collection phase benefits from real-time monitoring, where data quality issues can be addressed immediately, particularly in digital surveys. This active management of data collection fosters accurate responses and efficient data processing, maintaining respondent trust and cooperation.

Metrics: During collection, response rates, item nonresponse rates, and interviewer consistency are crucial. Monitoring respondent engagement and tracking survey drop-off points can indicate areas needing improvement, such as confusing questions or burdensome length.

4. Data Processing

The data processing phase is the last stage to catch errors before data enters analysis. Ensuring data is processed accurately is critical, as unchecked errors can lead to flawed insights and reduce the survey's credibility and utility.

Metrics: Processing error metrics, such as data entry accuracy rates, edit rates, imputation rate, etc.

5. Analysis and Evaluation

Consistency and clarity in analysis make survey data more useful and actionable for policy-making and public use. Evaluation metrics allow for feedback, which can inform adjustments in future surveys, fostering continuous improvement.

Metrics: Key metrics in analysis focus on comparability, coherence, and interpretability. For example, analyzing data comparability across time periods or demographic subgroups ensures consistency, while interpretability metrics gauge the clarity and usability of data outputs for end users.

Reducing Response Burden

We acknowledge that minimizing reporting burden on respondents is imperative as it can encourage participation and improve response rates, improve data quality, enhance efficiency, foster positive relationships, and promotes innovations in survey collection techniques. When surveys are less burdensome, participants are more likely to engage in information collection efforts. High burdens can deter respondents from providing thoughtful, meaningful data, which could lead to incomplete or biased information that can impact decision-making and policy formulation.

1. Electronic Format

To effectively minimize reporting burden for the upcoming 2030 Census Small-Scale Tests, several strategies can be adopted based on previous research and effective practices. The first approach is using electronic formats, either by utilizing online surveys, mobile applications, and/or automated data entry systems that allow respondents to provide information more quickly and easily. We also suggest utilizing electronic formats to implement dependent interviewing, as highlighted by the National Center for Science and Engineering Statistics.[2] Dependent interviewing utilizes previously collected data to inform current responses, thereby reducing the number of questions posed to respondents and minimizing cognitive load. In addition to streamlining the survey process, dependent interviewing could enhance data quality by encouraging response consistency. Finally, by utilizing electronic formats for data collection, we believe it would benefit the respondents by providing them with multiple submission options to help accommodate different preferences and capabilities.

2. Transparency and Trust

Another approach is to provide clear communication about the length and significance of the survey to alleviate perceptions of intrusiveness and length. According to the 2030 Census Advisory Committee's Fall[3] meeting held on October 18th, 2024, there has been general mistrust aimed at numerous government institutions, including the Census Bureau, which could stem from general government distrust, reservations regarding data privacy, apprehensions of data manipulation, and past government actions that contributed to fear and skepticism about how personal data is used and handled.[4] Communicating with the respondents and increasing transparency on how their information will be used and protected, as well as how their data will serve their community's needs, could help alleviate the negative perceptions many potential participants have regarding the Census Bureau's data collection methods. Additionally, it has been noted by the Government Accountability Office that several agencies did not receive many comments from the public during the Paperwork Reduction Act's required notice and comment periods, which could result in less informed burden estimates.[5] While the Department of Commerce (DoC) is requesting for public comment for the projected 2030 Census Small-Scale tests collection activities, we believe it would be generally beneficial for Bureau of the Census to increase visibility and transparency its activities to the general public.

If you have any questions about these comments, please contact Taylor Wilson at taylor.wilson@revealgc.com.

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[2] Reducing Respondent Burden on NCSES Surveys:

[3] https://www.youtube.com/watch?v=wD0vAkLmaBE

[4] https://hdsr.mitpress.mit.edu/pub/z4115tbw/release/3

[5] https://crsreports.congress.gov/product/pdf/IF/IF12673/2#:~:text=Burden%20occurs%20within%20the%20context.public%20or%20a%20third%20party.