

OMB Requirements and Guidance Related to Transparency



Workshop on Transparency and Reproducibility in Federal Statistics
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Washington, DC • June 21, 2017

Overview

- Paperwork Reduction Act requirements
 - Public Comment Periods
 - Documentation
- OMB Policy Directive No. 2. Standards and Guidelines for Statistical Surveys
 - Standards and Guidelines for Survey Documentation

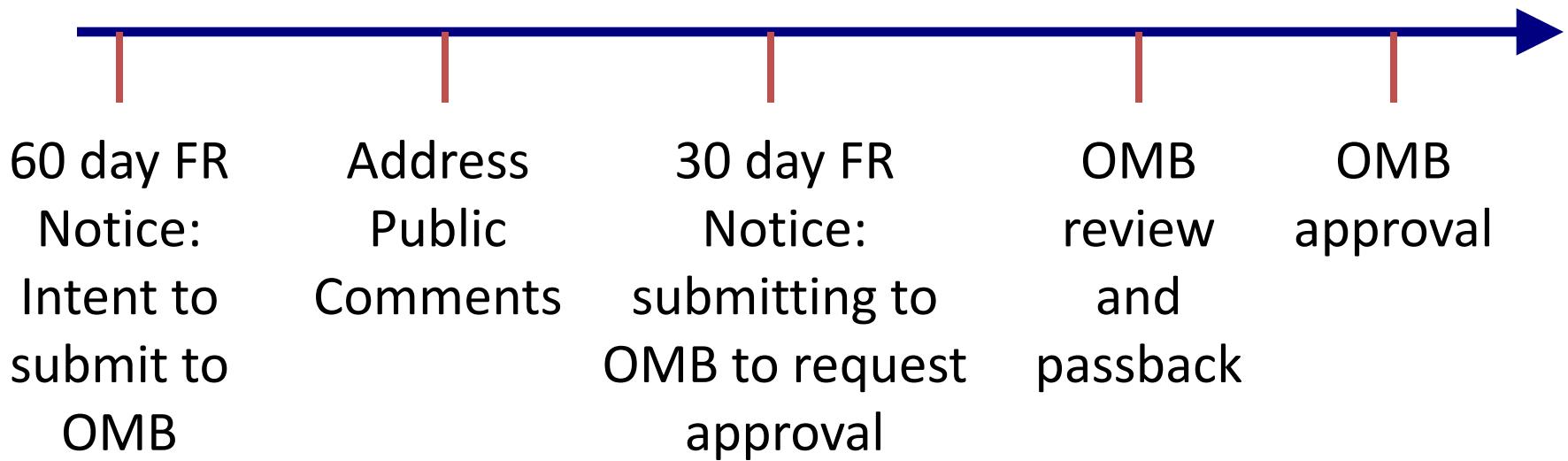
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OMB Review of Federal Information Collections

- Paperwork Reduction Act, 44 USC 3501
- **Purpose:** To improve the quality and practical utility of information required by the Federal government, and reduce paperwork burden on the public.
- OMB reviews **agency requests to collect information** to ensure that activities have practical utility, reduce duplication, meet a specific agency need, and minimize burden.

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The PRA Process



PRA Information Submitted to OMB

- ROCIS Core Data – type of submission, title, purpose, number of respondents, burden, frequency of collection, use of statistical methods
- Supporting Statement
 - Part A: Justification for ICR
 - Part B: Collections of Information Employing Statistical Methods
- Data Collection Instruments
- *Federal Register* Notice
- Public Comments and Agency Responses

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Part A Justification

1. Necessity of information collection
2. Use of information
3. Use of IT
4. Efforts to identify duplication
5. Minimizing burden on small entities
6. Consequences if information not collected
7. Special circumstances
8. Consultation with the Public and public comments
9. Respondent payment or gifts
10. Assurances of confidentiality

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Part A Justification

11. Questions of a sensitive nature
12. Time and monetary burden estimates
13. Total annual cost burden
14. Annual cost to the federal government
15. Explanation of program changes
16. Plans for publication and tabulation
17. Request exception for displaying
expiration data
18. Explain certification exception

Part B Statistical Methods

1. Universe and respondent selection
2. Procedures for collecting information
3. Methods to maximize response
4. Tests of procedures
5. Contacts for statistical aspects and data collection



Display additional information by clicking on the following: All Brief

Abstract/Justification Legal Statutes Rulemaking FR Notices/Comments IC List Burden Misc.

Common Form Info Certification

[View Information Collection \(IC\) List](#)

[View Supporting Statement and Other Documents](#)

View ICR - Agency Submission

ol No: 0607-0936

ceived in OIRA

Agency: DOC/CENSUS

ican Community Survey Methods Panel Tests

Information Collection: No material or nonsubstantive change to a
proved collection

view Request: Regular

ICR Reference No: 201704-0607-004

Previous ICR Reference No: [201702-0607-002](#)

Agency Tracking No:

Common Form ICR: No

Date Submitted to OIRA: 04/25/2017

	Requested	Previously Approved
Date	08/31/2018	08/31/2018
	576,000	576,000
n (Hours)	348,167	348,167
n (Dollars)	0	0

Standards and Guidelines for Statistical Surveys

- Issued September 2006
- Available at
- https://obamawhitehouse.archives.gov/omb/infօreg_statpolicy
- 20 Standards
- Supplemented with Guidelines or Best Practices
 - help agencies interpret and fulfill the goals of the Standard

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Framework for Standards

- Development of Concepts, Methods, and Design
- Collection of Data
- Processing and Editing of Data
- Production of Estimates and Projections
- Data Analysis
- Review Procedures
- Dissemination of Information Products

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Dissemination of Information Products

7.1 Releasing Information

7.2 Data Protection and Disclosure

Avoidance for Dissemination

7.3 Survey Documentation

7.4 Documentation and Release of
Public-Use Microdata

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Dissemination of Information Products

7-3 Survey Documentation

- Agencies must produce survey documentation that includes those materials necessary to understand how to properly analyze data from each survey, as well as the information necessary to replicate and evaluate each survey's results (See also Standard 1.2). Survey documentation must be readily accessible to users, unless it is necessary to restrict access to protect confidentiality.

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Survey Documentation

Guideline 7.3.1:

- Survey system documentation includes all information necessary to analyze the data properly. Along with the final data set, documentation, at a minimum, includes the following:
 1. OMB Information Collection Request package;
 2. Description of variables used to uniquely identify records in the data file;
 3. Description of the sample design, including strata and sampling unit identifiers to be used for analysis;
 4. Final instrument(s) or a facsimile thereof for surveys conducted through a computer-assisted telephone interview (CATI) or computer-assisted personal interview (CAPI) or Web instrument

Survey Documentation

5. Definitions of all variables, including all modifications;
6. Data file layout;
7. Descriptions of constructed variables on the data file that are computed from responses to other variables on the file;
8. Unweighted frequency counts;
9. Description of sample weights, including adjustments for nonresponse and benchmarking and how to apply them;
10. Description of how to calculate variance estimates appropriate for the survey design;
11. Description of all editing and imputation methods applied to the data (including evaluations of the methods) and how to remove imputed values from the data;
12. Descriptions of known data anomalies and corrective actions;

Survey Documentation

13. Description of the magnitude of sampling error associated with the survey;
14. Description of the sources of nonsampling error associated with the survey (e.g., coverage, measurement) and evaluations of these errors;
15. Comparisons with independent sources, if available;
16. Overall unit response rates (weighted and unweighted) and nonresponse bias analyses (if applicable); and
17. Item response rates and nonresponse bias analyses, (if applicable).

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Survey Documentation

Guideline 7.3.2: To ensure that a survey can be replicated and evaluated, the agency's internal archived portion of the survey system documentation, at a minimum, must include the following: (see handout)

Guideline 7.3.3: For recurring surveys, produce a periodic evaluation report, such as a methodology report, that itemizes all sources of identified error. Where possible, provide estimates or bounds on the magnitudes of these errors; discuss the total error model for the survey; and assess the survey in terms of this model.

Guideline 7.3.4: Retain all survey documentation according to appropriate Federal records disposition and archival policy.

Developing Estimates and Projections

Guideline 4.1.6: *Document methods and models used to generate estimates and projections* to help ensure objectivity, utility, transparency, and reproducibility of the estimates and projections. (For details on documentation, **see Section 7.3). Also, archive data and models so the estimates/projections can be reproduced.**

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Applicability to Administrative Records

From Introduction:

“To the extent they are applicable, these standards also cover the compilation of statistics based on information collected from individuals or firms (such as tax returns or the financial and operating reports required by regulatory commissions), applications/registrations, or other administrative records.”

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Guidance on Using Administrative Data for Statistical Purposes

OMB Memo M-14-06 Guidance for Providing and Using Administrative Data for Statistical Purposes

3. Documentation on Data Quality

- As part of M-13-13's requirement to manage information throughout its life cycle for interoperability and openness, program agencies should consider statistical agencies and components as potential data stakeholders. Further, ***in those limited cases where datasets are identified as of potentially high value for statistical purposes, program agencies should provide the technical documentation or other assistance that statistical agencies or components require to adequately assess the quality of a particular dataset.*** Statistical agencies and components should initially assess the quality of an administrative dataset prior to obtaining or using it. For datasets that appear useful and are obtained, statistical agencies and components will need to more thoroughly assess quality after receipt.

THANK YOU!



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