

Managing Stakeholder Expectations in Ongoing Federal Surveys

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1 Introduction and Background

The Substance Abuse and Mental Health Services Administration (SAMHSA) has asked the National Academies of Sciences, Engineering, and Medicine Standing Committee on Integrating New Behavioral Health Measures into SAMHSA's Data Collection Programs to assist SAMHSA with its responsibilities to expand behavioral health data collections in four areas: serious emotional disturbance in children, specific mental illness diagnoses with functional impairment, trauma, and recovery from a substance use or mental disorder. The committee is providing input on how to collect these data, which could involve developing new programs or adding new modules or follow-ups to existing SAMHSA programs, such as the National Survey of Drug Use and Health (NSDUH).

Modifying an ongoing survey disturbs the data collection and estimation process in ways that can affect the data and their many uses. Government surveys often develop a substantial and diverse stakeholder base and balancing the needs of existing data users with the need for updates and additions is a difficult task for many agencies. Adding new questions can also have substantial impact on existing questions, and the survey as a whole. Issues to be considered include possible context effects, associated effects on trend data, and unit and item nonresponse effects. There are multiple possible resolutions to these effects. The complexity of issues surrounding survey modification generates stakeholders with varying, and often competing, expectations on how to resolve any issue depending on their role and relationship to the survey.

This paper discusses processes and approaches to managing stakeholder expectations that can help SAMHSA navigate challenges associated with making large scale changes to an existing survey, such as the NSDUH, in situations when changes of this type are needed. The focus of this paper is squarely on stakeholders, and how to bring them into the discussion and decision-making to manage the effects on stakeholders brought about by modifying data collection in an ongoing survey. Rather than discussing stakeholders in the context of specific methodological issues, I describe techniques for managing stakeholder expectations by engaging stakeholders in discussion of methodological issues that result in a satisfied stakeholder base.

There is a considerable body of literature on managing stakeholders within the corporate for-profit sector. There is some literature on managing stakeholders within the public sector, but relatively little literature in the survey methods field on managing stakeholders.

For this paper, I have drawn on stakeholder literature from other fields, and on case studies of federal surveys that have undergone data collection changes. I conducted interviews with survey managers of four surveys – the Consumer Expenditure Survey (CE), the American Community Survey (ACS), the Commercial Buildings Energy Consumption Survey (CBECS), and the National Study of Long-Term Care Providers (NSLTCP) – on their overall approach and methods to engage stakeholders. I interviewed a former National Agricultural Statistics Service (NASS) administrator about their general survey and stakeholder management approaches.

Major changes to federal surveys warrant engaging stakeholders before implementation. As noted in the case studies presented here, agencies are in the early stages of developing systematic ongoing processes to interact with the many groups of stakeholders. Stakeholder roles in the process can vary

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from being recipients of information to understand agency decisions to being participants with responsibility to implement and monitor changes and their effects.

SAMHSA's experience with the 2002 NSDUH changes that resulted in a break in the data series provides an important backdrop for managing any future NSDUH changes to avoid measurement effects that impact uses of the data (Office of Applied Studies SAMHSA 2005). The 2002 changes included a survey name change, introduction of respondent incentives, improvement of the data collection quality control, and modification of the sample weighting procedures. Post analysis by a special panel of methodologists found it was not possible to measure the separate effects of each methodological change to adjust estimates for comparability to pre-2002 estimates. As a result, estimates under the new survey methods could not be compared to estimates prior to 2002. Survey methodologists *and* stakeholders should contribute to the development of a plan to manage potential changes to address such issues as prioritization of key statistical estimates, understanding data quality trade-offs with varying methodological decisions, the importance of trend analysis for different estimates, and the operational challenges of new data collection.

My intent is to provide SAMHSA with information that will aid in development of a change management process that involves both methodologists and stakeholders. I discuss the methods to:

- Create an agency compilation of stakeholder groups
- Understand the differing and overlapping needs and expectations of groups
- Relate stakeholders to specific survey issues (e.g., trend analysis)
- Engage appropriate stakeholders in well-defined decisions to be made regarding survey issues
- Be systematic in the process of engaging stakeholders and measuring outcomes

In Section 2, I discuss the importance of engaging stakeholders, which is recognized both within the federal government and in the broader stakeholder literature. From this broad perspective, I propose general lists of federal statistical agency stakeholders, and a list of SAMHSA stakeholders in Section 3.

Section 4, "Steps to Manage Stakeholder Expectations," outlines the process as derived from the literature and the case studies. This process includes understanding stakeholder perceptions and agency objectives for including stakeholders, recognizing the differing roles that stakeholders may have relative to the objectives, and designing the appropriate engagement strategy tied to the objectives. Depending on the stakeholder role and the objective (the outcome as it relates to the survey issue), the method used for the objective may vary from educational tools to forums of dialogue between stakeholders. Methods for sustaining stakeholder inclusion in agency activities are also presented.

Section 5 is a discussion of gauging success of stakeholder involvement in navigating survey change, with a final summary in Section 6.

I draw examples from the case studies throughout the paper. Each case study is presented in full in Appendix A, touching on the survey issues, the approaches used to engage stakeholders, the outcomes of the methods to incorporate stakeholders, intentions for ongoing stakeholder engagement, and the interviewed staff's general assessment of the process. The descriptions of the case studies are my own, have been reviewed by the interviewees, but are not meant to represent the agency. Appendix B

presents additional stakeholder theory notes from the literature that describe seven types of stakeholders and eight features of best practice. A set of research questions that would improve understanding of the process of engaging stakeholders is presented in Appendix C.

2 The Case for Stakeholder Participation

Agencies that administer federal surveys are faced with growing challenges in an era of increasing demand for data, greater cost to collect data, and political and managerial pressures to increase their efficiency. The complexity of these challenges requires knowledge of the survey stakeholders, and making decisions that adequately balance competing demands and expectations.

A statutory mechanism to allow for public comment on survey changes is the *Federal Register* established through the Paperwork Reduction Act (1980, 1995).¹ With any new collection of information from the public, including fielding a new survey or changing questions in ongoing surveys, the responsible department or agency must publish a *Federal Register* notice with draft materials available for review and allow 60 days for comment. This provides stakeholders the opportunity to be informed of the changes and to respond for the record to the sponsoring agency. At the time that the agency submits its package of information on the planned new data collection to the Office of Management and Budget (OMB) for review, a second notice is published in the *Federal Register*, with a 30-day comment period. With this submission, public comments go directly to OMB. Every three years a survey must go through the review process with OMB, whether there are changes to the survey or not.

Stakeholders can monitor the *Federal Register* announcements through the OMB public website Reginfo.gov that shows the announcements under review. While some stakeholders regularly monitor announcements, experience shows that there are often few responses to *Federal Register* notices indicating that this mechanism is limited in garnering stakeholder input.

Greater need for openness in the government process was reinforced in a Presidential memorandum, issued January 21, 2009, calling for the establishment of “a system of transparency, public participation, and collaboration.”² In April, 2010, the OMB issued a memorandum to the heads of executive departments and agencies and independent regulatory agencies, to provide clarifying guidance on the Paperwork Reduction Act intent and importance, thus reinforcing the message of the President’s memorandum.

In 2012, GAO issued a report that, in part, reviewed and recommended ways that statistical agencies could improve and increase efficiency. Recognizing the value of soliciting input and feedback on

¹ See *Federal Register* “Part III Office of Management and Budget, 5 CFR Part 1320, Reporting and Recordkeeping Requirements: Final Rule” 60(197) Tuesday, August 29, 1995.

² Memorandum for the Heads of Executive Departments and Agencies, and Independent Regulatory Agencies, From Cass R. Sunstein, Administrator, Subject: Information Collection under the Paperwork Reduction Act, April 7, 2010.

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information collections as a means to improve efficiency, GAO found that 75 percent of agencies in their representative sample of 112 data collections used external feedback in addition to the *Federal Register*. Fifty seven percent indicated that the agency consulted with experts. Other activities such as consulting with other agencies, advisory committees, survey respondents and data users were reported less frequently. GAO suggested that sharing practices across agencies on how to find duplication of efforts and solicit input could be useful. “Offering more-detailed guidance in a single document that outlines different actions agencies can take to identify duplication and solicit input would help ensure that agencies are aware of the various options. It would also allow them to easily access and reference this information.” (GAO, *Agencies Can Make Greater Use of Existing Data, but Continued Progress Is Needed on Access and Quality Issues* 2012: 15). There is a need for federal statistical agencies (FSAs) to address the lack of systematic knowledge of the costs and benefits of stakeholder engagement practices and outcomes.

Turning to the literature on stakeholders, the concept of stakeholder as important to corporate management to achieve corporate goals was presented by Freeman in 1984 in his landmark book *Strategic Management: A Stakeholder Approach*. Since then, a considerable body of literature has developed on the theory and study of stakeholders (Donaldson and Preston 1995, Goedegebuure 2006). Much of the literature has evolved in the business community, where Freeman (1984) defined a stakeholder as “any group or individual who can affect or is affected by the achievement of the firm’s objectives.” Such a broad definition has generated discussion and study to define and clarify the roles of stakeholders and the mechanisms under which they operate to influence corporate management. Donaldson and Preston (1995) describe three different stakeholder theory types: descriptive, instrumental, and normative. Descriptive theory is used to describe specific corporate characteristics and behaviors of managers and stakeholders; instrumental theory is used to identify the connections between stakeholder management and achieving corporate objectives; and normative theory focuses on the function of the corporation as it relates to moral and philosophical principles that affect stakeholders. The authors acknowledge that there is limited applicability in the not-for-profit sector, noting that conceptual issues, such as property rights, are unique to for-profit corporations.

There is limited literature on stakeholder types and processes in the government sector (Zhang, Dawes, and Sarkis 2005, Cameron and Crawley 2007). Principles from business models can be applied to categorize stakeholders by needs and expectations, and to systematically account for stakeholder groups within organizational decisions. Whether private companies or federal statistical agencies, the overarching benefits of attending to stakeholders for an organization are generalizable and include (Lauber, Decker, Leong, Chase, and Schusler, 2012: 140):

- Improving the information base: stakeholders’ needs, desires, beliefs, values, and behaviors
- Improving judgment: diverse stakeholders reveal the complications of balancing expectations
- Improving the management environment: improve the social climate to facilitate changing attitudes and behaviors, sharing of resources, compromising, and supporting management

3 Stakeholders of Federal Statistical Agencies

Despite the lack of literature on the study of stakeholder management in the field of survey methods, the case studies in this paper yielded some common themes, techniques, and challenges in engaging stakeholders. They also confirmed that federal statistical agencies are new to the process of systematically identifying the wide range of stakeholders, their needs and expectations relative to specific survey issues, and institutionalizing methods for managing stakeholder expectations on an ongoing basis. Within an agency, there may be substantial individual staff knowledge and communication avenues with stakeholders, which are often utilized on an ad hoc basis. Exceptions to this are Federal Advisory Committees and the use of the *Federal Register*. But, in general, these informal and formal mechanisms lead to feedback from a relatively small pool of stakeholders. Each of the case studies conducted for this paper highlights the agency's deliberate efforts to proactively identify and engage a wide range of stakeholders in management of survey changes.

Gaining agreement among stakeholders on specific survey content to be added or modified, such as in the case of the SAMHSA challenge in potentially adding questions on behavioral health to an existing survey, is only one decision that triggers many other related issues, or "subproblems." Survey managers and survey methodologists recognize the interrelationships of survey design effects. Management issues such as these have been termed "wicked" or "messy" (Rittel and Webber, 1973, Lachapelle et al. 2003 as cited in Leong, Decker, and Lauber, 2012). These terms effectively communicate the complexity of management decisions, characterized by an interacting set of subproblems that cannot be solved in isolation and have multiple possible solutions. These subproblems may only be effectively identified with meaningful proposed solutions when stakeholders are directly involved in the process (McCool and Guthrie, 2001). Therefore, stakeholder engagement is critical to fully understanding, communicating, and compromising with various constituent groups.

Stakeholder participation is not an end in itself. Reed (2008: 2421) notes that studies suggest that stakeholder participation may improve the quality of decisions, with the following caveat: "the quality of a decision is strongly dependent on the quality of the process that leads to it." He notes the need for studies to identify best practices in stakeholder participation. The 'tool-kit' approach to participation, which emphasizes selecting the relevant tools for the job, should be replaced with an approach that views participation as a process. "Perhaps a more appropriate metaphor for this view of participation is a 'service contract'" (Reed, 2008: 2421).

3.1 Classifying Federal Statistical Agency Stakeholders

The broad definition of stakeholder from the corporate literature as anyone who "can affect or is affected by" the organization achieving its goals can be more narrowly focused on survey stakeholders. The definition of survey stakeholders for the Consumer Expenditure Survey is a good working definition that is applicable across surveys.

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The stakeholders [for the Gemini Project to redesign the CES] include all groups involved in or concerned about the impact of survey design changes on the collection, processing, editing (including imputation and allocation), weighting, estimation, evaluation, quality and use of [CE] data.³

Federal statistical agency stakeholders for a survey can be distinguished by their role in the authorization and responsibility to conduct the survey and use the data. The survey data may be required by law, mandated to fulfill statutory requirements, or needed by agencies for programmatic purposes. The many additional applications of the data create stakeholder groups external to the federal government. Federal survey stakeholders can broadly be categorized into the following groups:

- Congress, as legislative authority establishing requirements for data collection and providing funds
- Office of Management and Budget, responsible for program administration oversight
- Home agency authorized to conduct the survey and manage its associated program needs
- Federal agencies that use the data for programmatic purposes
- Federal agencies and private contractors responsible for data collection, including program and operations managers
- Subject matter experts and analysts (data users) internal to federal agencies that interpret the data and address other related programmatic needs
- Subject matter experts and analysts (data users) external to the federal statistical system that add value to data through applications beyond the mandated purposes of the survey
- Survey methodologists, both internal and external to the agency, whose knowledge and research improve measurement, efficiency, and quality of the data
- Survey respondents on whom the survey depends to collect the data

Congressional stakeholders focus on program authorization and funding and the effects on their constituents as respondents and the data available for the areas they represent. OMB and federal agencies are guided by statutory, mandatory, or programmatic requirements for information to perform their responsibilities. Subject matter experts and analysts take the data and turn them into information for social and economic policy decision-making. Internal program and operations managers are affected by the parameters set on what information is to be collected, by when, and where, which influence the challenges to collecting and processing the data. External data users apply the data to expand subject matter knowledge and to support public and private programs. Survey respondents are in a unique category in that they have little, if any, vested interest in the survey data per se, yet they exercise power to comply with the survey request and are affected by the survey design, influencing the completeness and quality of the information provided.

Key characteristics that help define stakeholders recognized in the literature are *power, legitimacy, and urgency* (Mitchell, Agle, and Wood 1997). Their article is an excellent theoretical discussion of how to

³ Gemini Project Vision Document, February 25, 2015 revision.

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think about stakeholders and to identify stakeholder types in ways that managers can recognize and respond to stakeholders systematically. They define the attributes as follows⁴:

Power: ability to gain access to coercive, utilitarian, or normative means, to impose its will in the relationship

Legitimacy: the actions of an entity are desirable, proper, or appropriate within some socially constructed system or norms, values, beliefs, and definitions

Urgency: two conditions are present “(1) when a relationship or claim is of a time-sensitive nature and (2) when that relationship or claim is important or critical to the stakeholder”

Among federal statistical agency stakeholders, Congress possesses all three characteristics. Legitimacy and urgency are dominant characteristics of state agencies that depend on survey data for programmatic purposes. Academic researchers are strong in legitimacy, yet relatively weak in power and urgency.

Mitchell, Agle, and Wood (1997) also note that the attributes are dynamic and thus affect the saliency of the stakeholder to managers.

1. Stakeholder attributes are variable, not steady state.
2. Stakeholder attributes are socially constructed, not objective, reality.
3. Consciousness and willful exercise may or may not be present.

Together, the attributes of power, legitimacy, and urgency along with the principles that describe the dynamic nature of stakeholder-manager relationships provide a useful framework to begin to categorize stakeholders.

3.2 SAMHSA Stakeholders and NSDUH

While broad categories of federal survey stakeholders are generally applicable, particular surveys will vary in the specific groups and subgroups dependent on and affected by the survey and its products. Most of the substance abuse and mental health data that are gathered by SAMHSA are required by law and help meet many program needs. Identifying and classifying SAMHSA stakeholders is a critical first step in managing needs and expectations relative to potentially incorporating new behavioral health questions.

The categories of federal statistical agency stakeholders noted above, along with SAMHSA documents, provide broad categories of NSDUH stakeholders that clearly differ in their power, legitimacy, and urgency. Congressional mandate, Department of Health and Human Services (DHHS) programmatic requirements, and DHHS mission priorities define the primary NSDUH stakeholders. The list, which could be further developed with specificity by SAMHSA staff, includes:

- Congress and the Health and Human Services Secretary

⁴ Cited in Mitchell, R.K, B.R. Agle and D. J. Wood. 1997: 866.

- HHS program administrators
 - Office on Smoking and Health
 - National Institute of Mental Health
 - National Institute of Drug Abuse
 - Annual HHS underage drinking report
 - HHS Healthy People Objectives 2020
 - Agency for Healthcare Research and Quality
 - White House Office of National Drug Control Policy
- SAMHSA mission priorities and SAMHSA programs that use SAMHSA data
- State government programs including the Substance Abuse Prevention and Treatment (SAPT) Block Grant administering agencies⁵
- Other state and local government data users
- Subject matter experts and analysts within SAMHSA and HHS
- Subject matter experts and analysts in other federal or government agencies
- Subject matter experts and analysts in academia and non-governmental institutions
- Survey methodologists whose study and research lead to improvements in measurement
- Field interviewers
- Survey operations managers and administrators
- Survey respondents at all phases of data collection

These categories provide a starting point for SAMHSA to build their own database of stakeholders for NSDUH and other SAMHSA data collection programs to move toward fully understanding their base of customers, their needs and expectations, and their relative power, legitimacy, and urgency.

For example, here are two concerns where SAMHSA stakeholders' relative importance and interests will likely vary. Consistency in measurement across years will be of major concern to mental health program administrators, to internal and external subject matter experts, and to survey methodologists. In contrast, Congress, DHHS, and SAMHSA executive and senior staff are concerned with meeting legislative requirements with accurate information in a timely and efficient process. While both sets of stakeholders are committed to high quality data, the stakeholders' focus and expected outcomes differ in ways that may require separate steps to manage the expectations of these two groups.

4 Steps to Manage Stakeholder Expectations

While many agencies within the federal statistical system have institutionalized mechanisms to assure stakeholder voice in agency decisions, these mechanisms are not necessarily fully representative of the

⁵ See, for example, the Ruppenkamp, LeBaron, and Snodgrass "NSDUH State Data User Survey Results" prepared by RTI International, August, 2008.

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range of stakeholder groups and expectations. Further, the communications and exchanges may be informative but not influential in management decisions.

Federal surveys are guided by federal legal and policy practices, including the Administrative Procedure Act of 1946 (APA), the Federal Advisory Committee Act of 1972 (FACA), and the Negotiated Rulemaking Act of 1996 (NRA). Advisory Committees under FACA are well established to represent stakeholder constituencies. Another means of interaction of agency staff and stakeholders is regular attendance at professional association meetings. Federal staff present to and interact with data users and outside groups that are dependent on the survey. For example, the Association of Public Data Users has a long history of representing stakeholder issues in federal surveys. Individual data users often become experts in the issues important to stakeholders and the complexities of a survey, and become “go to” contacts when a federal agency needs stakeholder input. Oftentimes, these stakeholder interactions are not intended to address particular management issues with clear outcomes to be achieved by involving stakeholders in decisions. For example, an unanticipated result of the 2008 SAMHSA Survey of State Data Users was the need for improving communication with these stakeholders. This illustrates the inadvertent weaknesses that may be present that limit stakeholder knowledge, commitment and interest – missed opportunities.

Findings from the five case studies show that each agency conducted a methodical review and developed a strategy to address stakeholder needs, expectations, and involvement with purpose. The case studies differ in their success at meeting specific objectives, but all are informative (see Appendix A). SAMHSA’s interest in incorporating stakeholders to successfully manage potential modifications of NSDUH or other SAMHSA data collection programs in order to expand the collection of behavioral health information is a similar goal-oriented management challenge. This broad challenge can be further divided into specific methodological issues, such as the appropriate question wording and questionnaire placement for sensitive mental health questions, or the importance of trend data analysis. These subproblems each can be “tackled” through a managed process to include stakeholders.

Successful stakeholder engagement is characterized by clear shared understanding of the issue, the reason for involving stakeholders, and the desired outcome or decision. Techniques for communicating with stakeholders, such as written communications or in-person forums, become part of the strategy to achieve the objective.

Chase, Siemer, and Decker (2002) outline four management practices toward success:

1. Understand the situation: gather information from those close to the problem (managers and experts) and the broader range of stakeholder groups about how they see the situation and what is important to them.
2. Define agency objectives for stakeholder involvement. In addition to decision objectives such as meeting legal requirements, objectives for stakeholder involvement may include:
 - a. Improve the management climate to gain greater acceptance by stakeholders
 - b. Provide input on stakeholder needs, interests, and behaviors for decisions
 - c. Help in making decisions
 - d. Help in implementing management actions

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3. Select a stakeholder involvement approach that differs by degree of stakeholder influence relative to agency management. Levels of stakeholder involvement can be described along a continuum of influence, from authoritative to co-managerial.
4. Design a context-specific stakeholder involvement strategy. Use specific information gathering and stakeholder involvement tools to include stakeholders.

I use the four practices of Chase, Siemer, and Decker (2002) as steps to manage stakeholder expectations in the following sections.

4.1 Understand the Situation

There are four primary questions to address to fully understand your stakeholders:

- Who are they?
- What are their needs and expectations?
- What is their importance relative to specific survey management issues?
- How do their needs and expectations intersect?

In my review of the literature and discussions with survey managers, individual staff knowledge was the starting point to build a list of stakeholders by groups they represent. Outreach efforts, through referrals, industry communications, and public speaking efforts were used to create more comprehensive databases. A few examples from the surveys illustrate the procedures used to gather names of people and groups. In each case, the process was conducted over at least a few months.

The National Study of Long-Term Care Providers, conducted by NCHS, wanted to assure that stakeholders were well-represented in a one-day facilitated workshop to prioritize question content for the survey redesign. Starting with a list of approximately 1,000 people culled from listservs and compiled from staff knowledge of active, interested stakeholders, an invited participant list was developed of stakeholders from government agencies, service provider organizations, academic institutions, foundations, and policy-related organizations. This process alone took several months. Forty two individuals, representative of all stakeholder groups, participated in the workshop. The full process was carefully planned and comprehensive, with information provided to stakeholder representatives prior to the workshop to assure a full understanding of the decision issues.

The Consumer Expenditure Survey (BLS) is in the process of redesigning the survey over a 10-year period to address a number of issues. Stakeholder involvement was an important element from the start of the project, and list of stakeholders were compiled and categorized into five groups, based on their affiliation and use of the data:

- Consumer Price Index
- Executive/senior staff
- Microdata users such as policy analysts and 3rd party data aggregators
- Macroeconomists
- Census Bureau headquarters and field staff

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In a similar approach, the National Agricultural Statistics Service uses the four primary purposes of the data to provide a prioritization for management of data and stakeholders:

- Principal economic indicator
- Required by law
- Used by agency
- Remaining data uses such as in academia, commodity organizations, farmers, and businesses

The American Community Survey (Census Bureau) provides another good example of a systematic process to identify and categorize stakeholders to develop a database and to institutionalize the process for maintaining communications with the full range of stakeholders. The Census Bureau compiled an inventory of ACS stakeholders by “casting a wide net,” including organizations and individuals who were users of and affected by ACS data and data collection, as well as asking different organizations such as academic partners, OMB, and divisions within the Census Bureau (e.g., Population Division and Social, Economic, and Housing Statistics Division) to help identify stakeholders. ACS staff found this process very productive in uncovering stakeholders, by name and by group, who were not known in common among the ACS staff.

In a second step, ACS staff used characteristics related to *power, legitimacy, and urgency* to classify stakeholders in a way that was actionable. They created a 2 x 2 matrix of stakeholders, with one dimension being a judgment of the stakeholder’s overall level of need for the data (Hi/Lo) and the second being the relative influence (power) of the stakeholder (Hi/Lo). This matrix of stakeholders was used to allocate resources and develop stakeholder engagement strategies that differed across the four categories of stakeholders. ACS then used the stakeholder tiers to allocate communications and resources. Additional guidance was taken from the ACS Strategic Plan as to the goals and objectives for the program overall. This meant that the stakeholder strategy for a particular stakeholder group was dependent on both the existing level of interaction and Census Bureau interest in increasing stakeholder interaction (e.g., the business community).

In a study of e-government stakeholders from the literature, Rowley (2011) proposed typologies of roles and benefits, accompanied by a stakeholder benefits analysis tool, with roles and benefits specific to the management issue. Her interest was in understanding the connections between stakeholder interests, and conflicts in these interests, to enhance comparability and benchmarking. She offers a typology of 12 categories of e-government stakeholders, ranging from people as service users and as citizens to the IT developers and researchers (Rowley 2011: 56). She proposes a typology of 42 e-government stakeholder benefits, ranging from values such as inclusivity and democracy to functions such as easy-to-use and operational efficiency (Rowley 2011: 58). A matrix of stakeholder roles vs. stakeholder benefits was fleshed out by key informants to identify the most important benefits by stakeholder role, and through an iterative approach, a stakeholder benefits analysis tool (SBAT) was developed. The author notes the following outcomes that could inform further research and practice (Rowley 2011: 59):

- Generate insights into the benefits that are most important across a number of stakeholders
- Generate insights into the difference in emphasis and priorities between stakeholder groups

Of these agency approaches, the matrix of stakeholder category (generally organized by power) vs. the stakeholder use of the data (needs) can result in better understanding of where stakeholders may overlap and can improve internal agency shared knowledge of stakeholder prioritization. Further, a needs matrix will help in identifying which management issues require representation from specific stakeholder groups. For example, any breaks in data trends due to possible changes to the NSDUH may have greater consequence for some policy and data analysts than others (Office of Applied Statistics, SAMHSA 2005). A matrix of stakeholder role vs. stakeholder issues of importance would assure that stakeholders who will be most affected by an issue are consulted.

The FSA case study managers all recognized the value of systematically identifying and categorizing stakeholders. Stakeholder identification had traditionally been less formal, based on agency staff knowledge and experience, but was replaced by a more thorough process leading to increased knowledge of stakeholders and a resource for continued relationships.

4.2 Define Agency Objectives

Stakeholder needs and expectations should be tied directly to the decisions to be made. Here is where the agency specifies the objectives of involvement of different stakeholder groups, before deciding on the communications and methods for incorporating each group (Leong, Decker and Lauber 2012).

Stakeholder roles can range from being informed of agency activity to being included in making final decisions.

The many interrelated effects of survey design changes necessitate specifying the “subproblems,” such as measurement validity, response rate effects, trend analysis, and survey costs. Clearly defining the problem and specific decisions related to each topic will clarify how stakeholders should be incorporated into the decisions. Stakeholders will differ in the relative importance of subproblems to their needs, and the appropriate stakeholders should be engaged early on in the decision-making process.

The National Study of Long-Term Care Providers case study is the best example of a task-oriented use of stakeholders representing competing interests to help resolve an agency survey design decision. While federal statistical agencies use workshops and special meetings to communicate with large groups of stakeholders, these are successful in communication across stakeholders only if the forum is used for participants to discuss and make recommendations based on dialogue regarding competing alternatives.

Organizational management culture and the nature of the decision to be made will influence how stakeholders are involved in decisions. For example, to incorporate new behavioral health measures into an existing survey, SAMHSA may conclude that the needed changes are substantial and that a “bridge” survey should be considered. A well-documented experience is that of the Bureau of Labor Statistics when changes in the CPS methodology affected the unemployment rate estimate (Norwood and Tanur, 1994). The simultaneous fielding of the survey under the old and new design is a very good way to measure and correct for effects of survey changes in estimates from the new survey, but a bridge survey is an extensive effort. A bridge survey to address measurement effects is an issue that can be clearly defined and presented to appropriate stakeholders. Whether this is the most appropriate approach for SAMHSA, if potential changes to the NSDUH are considered, is an issue that warrants

discussions by both methodologists and stakeholders of the trade-offs in fielding, operational costs, data processing, and delivery of estimates.

4.3 Select a Stakeholder Involvement Approach

In this step, stakeholders' needs and expectations are associated with the survey issues to define appropriate approaches to involve stakeholders in the process. The roles of stakeholders relative to management and their contribution to decisions can be classified in terms of six different approaches (Leong, Decker, Lauber, Raik, and Seimer 2009; Lauber, Decker, Leong, Chase, and Schusler, 2012).

Top-down Governance

1. *Expert authority or authoritative approach*: top-down approach, managers make decisions and take actions unilaterally. Stakeholders are informed of decisions.
2. *Passive-receptive approach*: managers keep their eyes and ears open, welcome stakeholder input but do not seek it systematically. Managers listen to whichever stakeholders gain their attention.

Public Input Governance

3. *Inquisitive approach*: managers actively seek stakeholder input to inform an anticipated decision. Managers seek input from a broad array of stakeholders and many members. They may use systematic surveys or public meetings. Often, communication is one way where managers solicit input.
4. *Intermediary approach*: managers engage stakeholders in dialogue to understand *why* attitudes or opinions are held. They regularly attend scheduled meetings of stakeholders in person for direct communication. However, this approach does not emphasize dialogue *between* stakeholders.

Public Engagement Governance

5. *Transactional approach*: stakeholders describe their stakes to each other rather than having the manager act as intermediary, and they collaborate to prioritize these stakes. The role of the manager in this approach includes 1) facilitate productive interactions among diverse groups of stakeholders but participants need not be formal representatives of these groups; the managing group is seen as a member of the larger community of stakeholders and 2) ensure stakeholders are well-informed of relevant facts and legal considerations. This approach often requires a team of managers to implement the transactional approach.
6. *Co-managerial approach*: authority and resources necessary for management are shared between the management organization and the stakeholders. Management authority and resources are often split across agencies and at different governmental levels, particularly in addressing complex issues. Resources, expertise, and authority are distributed across management organizations and stakeholder groups to enable decision-making and implementation of decisions.

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The six approaches can be visualized along a continuum of increasing relative degree of stakeholder input and power across the management approaches. The authoritative approach has the lowest level of stakeholder involvement while the co-managerial approach has the highest level of stakeholder involvement, where the stakeholders have the most decision power relative to management. Power rests primarily with management in the Authoritative and Passive-Receptive approaches, while stakeholders are more powerful in the Transactional and Co-Managerial approaches. The shift in power dominance occurs across the Inquisitive and Intermediary approaches.

Acknowledgement by the agency of the approach in use for stakeholder groups can contribute to the organizational strategy. For example, SAMHSA may decide that local health care agencies will be engaged using top-down governance approaches, while state Substance Abuse Prevention and Treatment (SAPT) state agencies will be managed with an intermediary or, possibly, transactional approach.

Leong, Emmerson, and Byron (2011) provide an excellent discussion of the challenges facing the Department of the Interior in institutionalizing these approaches within the agency. The challenges they identify are also relevant to other federal statistical agencies. The authors relate the federal legal and policy practices to the six management approaches, referencing the Administrative Procedure Act of 1946 (APA), the Federal Advisory Committee Act of 1972 (FACA), and the Negotiated Rulemaking Act of 1996 (NRA). The process generated by the APA can be considered an Inquisitive approach, and the FACA and NRA processes are within the Transactional approach.

Despite the use of transactional approaches through FACA and NRA regulations, Leong, Emmerson, and Byron note that the Department of the Interior is at the early stages of institutionalizing public engagement practices based on their interviews with ten federal agency practitioners and staff. Their full article is well worth reading because of its relevance to the challenges of engaging stakeholders in a federal agency, whether these are the general public or the many data user constituencies. Briefly, key findings from their interviews are (p. 241):

- The current “agency culture indicates that the public engagement governance model is still in its early adoption stage.”
- A number of steps that could facilitate adoption are “access to a standard set of resources” on possible approaches to public participation, “diagnostic tools to help identify objectives and pair them with appropriate process design and metrics of success,” rewards and incentives to encourage staff adoption, and cost-benefit analysis of processes.
- Interviewers observed the rise of adaptive management that is collaborative and encourages two-way dialogue.
- There is a need for a comprehensive theory for collaborative management that will result in greater embrace of public engagement governance.

Commitment to the role of stakeholders by the executive staff of the agency sends a strong message to both agency staff and the stakeholders themselves. While agency directors participate in advisory committee meetings on a regular basis, their direct participation in other stakeholder venues can encourage staff and stakeholders. For example, the NCHS director, the NCHS associate director for

science, and the director of the Division of Health Care Statistics endorsed and spoke at the stakeholder workshop that was conducted to help prioritize content of the NSLTCP questionnaire, and this was deemed important in the staff's assessment of the workshop success.

Any change needs to be carried down the organization; ideally, from top level executive staff to the field interviewer in a shared, consistent understanding of all stakeholders involved. Further, as noted by a Census Bureau manager, it is valuable to ensure a pathway of access by stakeholders at all levels of the agency, up to the director.

4.4 Design a Context-Specific Stakeholder Involvement Strategy

Specific methods to communicate with stakeholders are dependent on a good understanding of the stakeholders' needs and perceptions, and clear specification of the objectives for incorporating stakeholders into issue management. Many of the techniques used to communicate with those who have interest in or are affected by a survey are familiar to us, as many of us have roles as stakeholders ourselves. The list provided by Lauber et al. (2012) is a good summary of common tools to consider when engaging stakeholders.

The list provides a good starting point for consideration.

1. Information dissemination: fact sheets, newsletters, brochures, issue papers, and progress reports distributed through mailing lists, agency offices, websites, listservs, electronic mailing lists, and social networks such as Twitter or Facebook.
2. Open houses: outreach and education efforts where stakeholders gather info, ask questions, and offer feedback in an informal setting.
3. Public meetings: short one-time events similar to open houses, but sometimes participants were limited in time to state their position and speak.
4. Solicitation of comments: commonly used; formal solicitation may be issued. (e.g., *Federal Register*) or less formal such as blog or interactive Web site. This may result in only hearing from the most passionate stakeholders.
5. Surveys: a means to ask for input from wide band of possible stakeholders; various modes may be used; may result in input from those who do not typically communicate with agency.
6. Focus groups: may provide in-depth information on a topic, not available through some other mechanisms, but not generalizable.
7. Workshops: a few hours to a day, asking participants to complete some type of task, such as prioritization of options, generating a list of management alternatives, or identifying possible concerns. Workshops may broaden the thinking of agency managers to consider needs and concerns of stakeholders and participants to improve their knowledge of management and other stakeholder issues.
8. Task forces: stakeholder committees that meet multiple times over weeks or months to accomplish a task. Usually the task is larger and more complicated than that of workshops. This may require gathering information, reaching consensus on goals and objectives, and recommending actions.

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9. Large-group planning and decision-making processes: direct dialogue and interaction among stakeholders. Generally, very active engagement in broad discussion of the larger issues, envisioning a solution, and democratic decision-making. This can be effective in transactional and co-managerial approaches, and requires substantial investment of resources.
10. Advisory committees: not restricted to a particular task; advise on an ongoing basis; provide stakeholder feedback on agency judgment about how to balance management concerns. Feedback may be influenced by the interests represented on the committee.
11. Negotiated agreements: often used in co-managerial approach; specific roles, responsibilities, and mechanisms for resolving disputes are specified.

While a technique, such as “public meeting,” is essentially a tool, applying this tool as a method to engage stakeholders requires tying the tool to the objective and expected outcome of the stakeholder process. Each of these methods can vary in their communication style, content, and effectiveness which will depend on the audience and objective.

Federal surveys in the case studies presented here have used many of these tools. Examples from the case studies illustrate how these tools can be applied and where they might be most effective. Four of the case studies – Consumer Expenditure Survey, American Community Survey, Commercial Buildings Energy Consumption Survey, and National Study of Long-Term Care Providers – focus on organizing and engaging stakeholders in response to specific management decisions to modify the ongoing survey. In all but ACS, the survey was undergoing major redesign, necessitating stakeholder education as well as input in decisions. While the NASS case study is generalized across survey management at the agency, NASS has a number of processes in place for two-way communication with stakeholders.

There is a lack of good information on the effectiveness of stakeholder engagement methods in federal statistical agencies. There may be good anecdotal information, best gleaned from discussions with staff who have used a method firsthand, but systematic studies of cost benefit are more difficult to find. A service to all federal statistical agencies would be the initiation of compiled information on stakeholder audiences, cost in terms of finances and resources, method of incorporating stakeholders, desired outcome, and measured outcome. As noted by GAO, there is a need for shared knowledge across agencies. In this time of strained budgets and high demands for transparency, organized measurement of stakeholder engagement methods is sorely needed. Shotgun “strategies” to try a wide range of stakeholder communication methods without clear goals and measurement are not advisable.

4.4.1 Methods for stakeholder education and information delivery

The methods described in this section are primarily outbound messaging options. The intent of these is to provide information and educate a wide range of stakeholders.

The *Federal Register* notice is the required mechanism for federal statistical agencies to publicly provide information and the opportunity for feedback from stakeholders. Although also intended as a means to obtain stakeholder input, the *Federal Register* notices seem to generally solicit few comments, based on my discussions for this paper with experienced staff. Yet, as a tool to provide information it is critical.

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Agencies have communications programs to keep stakeholders informed of the agency's activities. Communications vary in terms of the message and intended audience. Electronic communications are increasingly being used in place of written materials, in part because it is easy to tailor and distribute messages in a timely and targeted way. One example of regular information flow through electronic media is NASS's posting of the monthly calendar with day and time of each data release. Public posting of dates results in expectations of staff that deadlines will be met, and success is measured and used as a performance metric in evaluations. Observations about agency electronic communications include:

- Agency websites are heavily used for outward communication with agency contact information.
- Social media such as Facebook and Twitter are used less. NASS has made some use of Twitter, for example. NASS and the Census Bureau both have considered establishing a blog to engage data users, but decided not to use this platform due to concerns about unmanaged, unsupervised discussion. EIA does use a CBECS Blog on the EIA website, authored by the survey manager, to keep stakeholders informed about the CBECS schedule and milestones throughout the project cycle.
- Email lists of data users are used by agencies, with encouragement to pass the notices on to others to reach a broad range of possible stakeholders. One consequence of this method is that the agency does not have good information on which stakeholders have actually been reached.

Another method for informing stakeholders, and more broadly educating stakeholders, is the use of professional meetings. Again, though not exclusively outbound messaging, agencies often use these forums as a means to "get the word out." Stakeholder input is generally ad hoc and may not be systematically fed back to the agency. This group of methods includes:

- Federal Committee on Statistical Methodology (FCSM) conference
- Professional organization meetings, e.g., American Statistical Association Joint Statistical Meetings or industry-specific meetings, such as commodity associations or health organizations
- Association of Public Data Users (APDU) webinar

Professional meetings are widely used by agencies as a forum for presentation to segments of stakeholders with similar needs and expectations regarding the agency's products.

4.4.2 Methods for obtaining input from individual stakeholders

Methods in which stakeholders are able to provide feedback, comments, or general input to the agency are common. There is a two-way conversation between the agency and the stakeholder (individual or specific group), typically with the agency providing information or asking for comment on topics. However, there is often no clear shared understanding of how stakeholder comments will be incorporated into decision-making by the agency. The gathered information needs to be synthesized by the agency to understand the predominant stakeholder positions.

Listed below are examples of obtaining input methods from the case studies.

Opportunities for stakeholders to initiate input in response

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- *Federal Register* notice; however this mechanism often provides limited input; for example, EIA received only one comment in response to the *Federal Register* notice on the 2012 revision of CBECS. Some organizations provided substantial input directly to EIA, preferring this channel of communications about the proposed changes.
- The Gemini Redesign Webpage “was designed as a two-way portal to allow the public to both access information from and provide feedback directly to the Gemini Users Impact Team” (BLS 2014b). Features include an updated list of outreach events, new information such as documents, timelines and surveys, an interactive graphic that identifies differences between the current and the redesigned survey, and the step-by-step redesign procedure.
- Data users impact online survey; ACS posted an online data users feedback form on their website and few responded. The staff found the feedback informative, but its use was limited in providing new information to the ACS staff.

Sessions with specific stakeholder or group

- Meetings with other federal agencies
- Meetings with different groups representing industry sectors who are data users
- Field interviewers feedback sessions
- Mock interviews with disgruntled stakeholders to demonstrate challenges of data collection (CE)
- One-on-one discussions with key stakeholders; these are often informal meetings and may be exploratory in nature. NASS noted that key stakeholder discussions are used frequently.

Workshops or forums with multiple stakeholder groups present

- Census Sponsors meeting, in which the format is information session with time for questions and comments
- Workshops to gather input on whether survey products were meeting the users’ needs. The Census Bureau conducted two workshops— a Federal Data Users Workshop and a Non-Federal Data Users Workshop. The latter was organized by the National Academy of Sciences, Engineering and Medicine (National Research Council, 2013). The intent of these workshops was “to increase ACS program stakeholders’ understanding of how ACS products meet their needs” (ACS Program Review Final Report 2013: 10).

An advantage of the many methods to obtain input from stakeholders is the wide choice of communication platforms. Some of these are easy to implement and monitor, providing a means to continually “scan” for stakeholder issues that might not otherwise be known.

4.4.3 Methods for engaging stakeholders in dialogue to address an issue

Methods that engage stakeholders in dialogue with each other and the agency around an issue are focused on problem-solving. These methods are best for developing answers to specific questions where the agency needs to make a decision affecting a wide range of stakeholder groups.

The NSLTCP case study provides an excellent example of stakeholder involvement with a specific, well-defined task – namely, to prioritize the critical content to be included in the questionnaire. In the survey

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redesign, many of the redesign decisions that were governed by legislative and programmatic parameters were made by the agency and stakeholders prior to turning to the community of data users for their input. NCHS used a facilitated workshop of stakeholder representatives to propose, discuss, and reach compromise on a list of additional questionnaire content from a list of options. NCHS had already culled possible content within four broad topic areas (provider services, provider staffing, policy-relevant provider practices, and aggregate service user characteristics), which defined four cycles of discussion during the workshop day. The result was a vetted list of additional questions that would best satisfy the groups of stakeholders represented in the workshop. (See Appendix A for full case study.)

Important aspects of the workshop that NCHS noted include:

- The workshop objective was clear and well defined – prioritize the list of possible content that had been culled by agency staff ahead of time.
- Participants were assigned ahead of time into small groups in the workshop, with each group’s members representing different stakeholder segments.
- An expert in organizational change was used to facilitate the work group who was unbiased, experienced in managing a diverse group of participants, and had a real-time voting mechanism that allowed for tabulating prioritization votes.

Similar in intent, ACS went through a process in revising questionnaire content that did not include stakeholder review until late in the process. The Interagency Council on Statistical Policy (ICSP) Subcommittee on the American Community Survey was chartered “to oversee policies guiding the development and maintenance of content for the survey” (ACS Fiscal Year 2014 Content Review Results: Final Report 2015). The approach the subcommittee took was objective and quantitative. Questions were evaluated using 19 specific decision criteria along the dimensions of:

- Mandatory (statutory), required (federal law or implementing regulation required use of specific data), or programmatic (the data were necessary for agency operational needs)
- Level of geography of estimates (block group/tract, county, state/national)
- Difficulty and cost of data collection.

The ACS Content Review was heavily driven by metrics to measure the relative value of each question in the survey with a decision to eliminate seven ACS questions. While the outcome of this process was objective and quantified, the *Federal Register* notice with a 60-day comment period produced stakeholder input that resulted in the decision to *not* eliminate six of the seven questions. One can only conclude that the resource-intensive metric-driven review process, while informative, was not sufficient to make the decision on which questions to eliminate. Questions that are very important to a large number of users were retained. Part of this was due to stakeholders’ mobilization to ensure that sufficient comments were received for reconsideration of the decision.

Other federal statistical agency forums that promote dialogue *across* stakeholders to assist in advising on an agency decision are:

- Advisory Committees under FACA rules: meetings are open to the public, committee members are recruited across broad groups of stakeholder sectors and carefully vetted,

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new members must be approved by the Department Secretary; stakeholder sectors include academia, programmatic organizations, and associations; meetings are carefully orchestrated.

- Survey Methods Symposium invited sessions: Consumer Expenditure Survey team conducted a forum to promote dialogue among survey methodologists on the survey redesign.
- Annual data user meetings: NASS conducts meetings by data user sectors, typically 100 or more attendees, to jointly learn and discuss survey and program changes; meetings are a productive forum to manage “anger” when unexpected changes are discussed with stakeholders; users are very interested in changes and typically half of the floor time is devoted to floor discussion.

The advantage of a method that includes dialogue among stakeholders focused on a specific survey design issue is that differing perspectives and expectations can be shared and viable compromises can be identified in a timely manner, resulting in direction to the agency and common understanding of trade-offs among stakeholders. SAMHSA could use this method for issues where multiple options are being considered, such as how to manage data trend analysis. SAMHSA could clearly specify the survey design issue and the outcome needed to make a decision, provide a forum for dialogue, and measure results. Data on the time, cost, use of resources, and whether the outcome resulted in action by the agency, especially in comparison to methods whereby an agency gathers stakeholder input and synthesizes information as described previously, would be very helpful in learning the effectiveness of these alternate methods.

4.5 Manage and Sustain Stakeholder Engagement

Among and within agencies of the federal statistical system, practices will vary as to messages and communication methods across stakeholders and by issue. To be able to effectively and efficiently include the right stakeholders in both large and small issues, an agency-wide commitment to stakeholder management is critical.

Some of the management practices that provide clear mechanisms and avenues for stakeholders include:

- Using a Survey Director as a primary point of contact for customers/stakeholders.
- Conducting regular monthly operations meetings between the program directors and the staff responsible for operating the program.
- Organizing annual or semi-annual stakeholders meetings in which stakeholders are invited to attend a session, as a forum for the agency to inform and discuss data collection issues and updates with stakeholders. (These meetings can be used to promote dialogue among stakeholders, as noted previously in the NASS example.)
- Conducting a customer satisfaction survey at appropriate intervals.

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- Using a Portfolio Management Governance Board in which an internal leadership team is used to vet and decide on the allocation and timing of resources. This is a systematic way to manage competing needs and expectations of internal stakeholders. The governing board has a broader view of the agency systems overall and can help negotiate compromise between legacy systems and requests for new systems.
- Establishing ongoing data user groups. ACS commissioned the Population Reference Bureau to establish an ACS data users group as an ongoing forum for informing users and providing a resource to ACS to obtain user feedback.

A good way to continually tie objectives to the stakeholder process is to use project management techniques. ACS successfully used a project plan in order to clarify the tasks, timeline, and responsibilities to complete the Communications and Stakeholder Engagement Review. Major phases of the project were noted (e.g., Conduct Environmental Scan/Data Call of Communications Materials), and specific tasks within these phases were noted, using the Responsible, Accountable, Consulted, and Informed (RACI) technique in which individuals or groups are assigned one of the four roles depending on task.

ACS's ongoing commitment to be responsive to stakeholders is evidenced in *Agility in Action: A Snapshot of Enhancements to the American Community Survey* August 2015 revision. The overarching purpose is "to ensure that our customers trust and value the survey" with nine specific initiatives that each will benefit stakeholders in some way.

The extensive attention to data users in the CE redesign has raised the agency's commitment to ongoing stakeholder activities. For the redesign process, BLS established the Gemini Data Users Impact Team (BLS, *Gemini Data Users Impact Team Final Report* 2014). The CE staff anticipate continuing some of the stakeholder activities, even after the redesigned Consumer Expenditure Survey has been implemented. In particular, the interactive webpage will be updated and remain a communication tool, developers of CE communications will take advantage of knowledge that has been compiled on stakeholder concerns, and suggestions from stakeholders will be considered in decisions on the release of data from the redesigned survey.

The successful use of the stakeholder workshop in revising the NSLTCP has had ripple effects in continued communications. There has been regular interaction, often informal, with key stakeholders, including some workshop participants with particular expertise, and other active researchers on long-term care. The stakeholders provide input in determining product topics, questionnaire revisions, and outreach to the target respondent population to increase survey participation.

The Long-Term Care Statistics Branch of NCHS recognized yet another opportunity for managing stakeholder relationships – a by-product of current stakeholder communications. Staff have begun monitoring page hits on their website, as an indicator of where users are most active and of their information interests. They observed a pattern of users taking different multi-click routes to find a particular page, which led to revising a page to provide a direct link.

5 Gauging Success

In management problems with interrelated issues, there will be many different definitions of success. Although broad achievements such as “increased shared knowledge of the problem” or “better understanding of the legal requirements” may be agreed upon as worthwhile goals in engaging stakeholders, there is likely to be disagreement on the specific actions to be implemented, or possibly the specific outcomes to be reached.

Assessment of success in stakeholder engagement informs subsequent decisions on how to incorporate stakeholders in management. Lauber and her colleagues note that successful engagement is tailored so that the approach is “sufficiently robust to encompass the breadth and ever-changing nature of stakeholder interests” (Lauber et al. 2012: 155). That is, the agency should think beyond what worked now for a particular issue when assessing the success of the process. Three criteria that they propose are:

1. The decision accommodates the diversity of stakeholder interests.
2. Stakeholders are satisfied with the process used to incorporate their concerns into decision-making.
3. Stakeholders are satisfied with the degree to which changing beliefs and attitudes are reassessed and integrated into an adaptive management strategy.

All of these criteria are measurable. Of particular note for consideration in survey management is criterion 3 – the longer term commitment to incorporating stakeholder interests. “Adaptive management strategy” can be compatible with adaptive survey design.

More specifically, it is important to consider ways to measure effectiveness of stakeholder communication channels. Evaluation of whether messages were received and led to changes in knowledge, attitudes and behaviors is paramount to planning future communications, if for no other reason than cost in time and resources on the part of the managing organization.

Success as defined by the stakeholder is also important in providing direction to the managing agency in implementing solutions. McCool and Guthrie (2001) conducted a study to determine the dimensions of stakeholder perceptions of success in an agency’s planning projects. They used semi-structured interviews across the stakeholder groups that included scientific and managerial participants, and a sample of public participants. Transcribed interviews were subject to a content analysis, and dimensions of success were derived using ethnographic statistical software. Results include three product-oriented measures and nine process-oriented measures. In addition to understanding what elements define success for groups of stakeholders, further research is needed on how to measure the frequency of an outcome affecting a stakeholder or the relative importance of an outcome to a stakeholder (McCool and Guthrie, 2001).

Success as gauged by the stakeholders was measured at the conclusion of the NSLTCP facilitated workshop, where participants representing diverse stakeholder groups were asked to prioritize question topics for the revised survey. In a questionnaire, participants evaluated their satisfaction on four dimensions, using a 5-point scale from strongly agree to strongly disagree:

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- Satisfaction with outcome
- Satisfaction with process
- Confidence in having an impact on final survey
- Willingness to give further input

The results were overwhelmingly positive, and the negative comments will be used as guidance for planning future workshops.

Measuring success of stakeholder processes can lead to greater effectiveness and efficiency in future projects, and contribute to a shared body of knowledge on methods to incorporate stakeholders in managing survey change.

6 Summary

Recent direction in the federal government from the President and GAO encourages greater transparency and collaboration among government agencies. Stakeholder engagement is a critical component. Complex problems with multiple solutions can be well served by incorporating the values, perspectives, and needs of the diverse set of stakeholders. Shared knowledge and discussion will contribute to improved information for decision making, better judgment in the decision, and ultimately a better decision.

The literature on managing stakeholder expectations in ongoing surveys is limited, but there is relevant stakeholder literature in other fields. Important defining stakeholder attributes are *power*, *legitimacy*, and *urgency*. These concepts lead to ways to categorize stakeholders in their relationships to the managing agency. The roles and relationships of stakeholders in agency decisions vary and should be accounted for in the process. Throughout the literature and in the experience of the case studies discussed here, the first step is to identify and understand the stakeholder groups, whether actively engaged or not. The agency should recognize the expectations and relative influence of the different stakeholder groups.

The agency should define agency objectives relative to stakeholder groups. Clear understanding of the outcomes to be achieved by incorporating stakeholders in a management issue results in more productive dialogue with stakeholders and better shared understanding of issues among managers and stakeholders. The agency should prepare appropriate strategies to include the stakeholder groups. Chase and her colleagues (2002) describe a useful framework for identifying stakeholder approaches, with six approaches varying by degree of responsibility of the managers and the stakeholders.

The tools for communicating with stakeholders are familiar to us – newsletters, focus groups, workshops, informal meetings, advisory committees, and the like. The critical finding is the importance of using the appropriate communication strategy for a particular stakeholder group to meet a specific goal or objective. The case studies illustrate a range of methods, from use of websites to inform and educate to the use of a facilitated workshop to have stakeholders prioritize question topics.

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It is difficult to identify “best practices” in managing stakeholder expectations in ongoing surveys due to the lack of documented and measured activity. While informal feedback may be a good indicator, more formal measurement can be helpful for planning future activity. Survey organizations could greatly benefit from systematic research and sharing of practices. Agencies are recognizing the need and value of ongoing stakeholder engagement and developing processes that can be repeated and applied as appropriate in making management decisions. With pressure to be more efficient in federal programs, SAMHSA could consider the example of the NSLTCP facilitated workshop where the purpose of engaging stakeholders was clear and the mechanism encouraged dialogue.

The management of stakeholder expectations regarding specific issues of concern, such as context effects, response rate effects, or data trend analysis, can be approached using the techniques presented in this paper. The groups of stakeholders will vary, depending on the specific survey change issue, the decision to be made, the roles of the stakeholders, and the expected outcome of the process to include stakeholders. We lack good information on the relationship between methods to engage stakeholders and effective and efficient decisions in managing changes in ongoing surveys. We have an opportunity to increase our shared knowledge. SAMHSA can help lead the way by designing, documenting, and measuring their stakeholder engagement process and outcomes.

Appendix A: Case Studies of Stakeholder Engagement in Federal Surveys

The summaries here are based on conversations with agency staff members, as noted, and are not meant to represent the survey agency's public presentation of these issues. Related agency papers and publications are noted, where available, and these can provide the reader with deeper and more comprehensive discussion of the experiences presented here.

The Consumer Expenditure Survey (Adam Safir - branch chief, CE Survey Research and Program Development; Laura Erhard – project manager for Gemini survey redesign project)

The issue:

There was widespread recognition that the survey design needed revision to better capture consumer behavior in the changing economic and survey environment. Information gathering and discussion of survey redesign actively began in 2009 and resulted in the formal establishment of Project Gemini to manage the survey design, testing, and implementation of a new design over a 10-year period.

BLS carefully identified and defined the most important issues to be addressed by redesign, prioritized as 1) measurement error, particularly related to underreporting; 2) environmental changes that provide new technology for data collection; 3) greater flexibility both to accommodate multiple modes of data collection and to implement survey changes faster.

Approaches used to engage stakeholders:

Engagement of stakeholders in the redesign process was a primary concern from the start. The call for changes came, in part, from the macroeconomist user community. The Consumer Price Index is the main reason and driver of CE data collection and survey design. Other uses of the data have emerged where stakeholder communities are heavily dependent on the CE survey.

Stakeholders were categorized into five groups, based on their affiliation and use of the data:

- Consumer Price Index
- Executive/senior staff
- Microdata users, such as policy analysts and 3rd party data aggregators
- Macroeconomists
- Census Bureau headquarters and field staff

An extensive set of activities to include stakeholders was planned and conducted over a multi-year period, and continues. BLS commitment to engage stakeholders resulted in the Gemini Data Users Impact Team. An excellent summary of the team purpose, processes, and accomplishments is available in *Gemini Data Users Impact Team Final Report* (2014). Data User Impact Report: <http://www.bls.gov/cex/userimpactreport.pdf>

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The two stated purposes of the team, which provide a good framework that could be applied to other surveys:

1. “Solicit feedback from users and compile their concerns pertaining to their use of the data.”
2. “Educate the public on: 1) the features of the new design, 2) the scope of the data that would be available, 3) the timeline for implementation, and 4) the plans for aiding users in the transition to the new design.” (BLS 2014a: 4)

Techniques used for engaging stakeholders include:

- *Federal Register* notice
- Gemini Redesign Webpage
- Survey Methods Symposium invited sessions
- Housing Statistics data users meeting
- Federal data users meetings (2 parts)
- APDU webinar
- Data users impact online survey
- Census Sponsors meeting
- Federal Committee on Statistical Methodology (FCSM) conference
- One-on-one discussions with key stakeholders
- Exploratory outreach to key stakeholders
- Field interviewers feedback sessions
- Mock interviews with disgruntled stakeholder to demonstrate the challenges of data collection

A list of outreach activities prior to the redesign release can be found on the CE Gemini Project Materials page: <http://www.bls.gov/cex/geminimaterials.htm>. Outreach events after the release are on the main Gemini page at <http://www.bls.gov/cex/geminiproject.htm>.

The Gemini Redesign Webpage “was designed as a two-way portal to allow the public to both access information from and provide feedback directly to the Gemini Users Impact Team” (BLS 2014b). Features include updated list of outreach events, new information such as documents, timelines and surveys, an interactive graphic that identifies differences between the current and the redesign, and the step-by-step redesign procedure.

Outcomes of stakeholder engagement techniques:

Although I am not aware of specific assessments by CE staff of stakeholder satisfaction with the process, the staff who I spoke with and the Data Users Impact Team Final Report indicate that stakeholders have been actively participating, have contributed information helpful in the survey design decisions, and that the stakeholder feedback has generally been positive.

At the same time, the stakeholder activities helped highlight concern about two features of the redesigned survey – the elimination of panel data and the reduction in the overall number of expenditure categories. This is helpful to the redesign team in decision-making on design elements and communication strategies with stakeholders moving forward.

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The online Data User Impact Survey was conducted in February 2014 to provide an additional channel for stakeholder input when a new design had been defined. This feedback mechanism was in addition to other face-to-face techniques listed above. The universe of those surveyed was comprised of an email blast list, users' needs conference attendees list, and the members of the Consumer Survey list receiving survey updates. Only 22 respondents accessed and answered at least one question. Despite this, the Impact Team derived some helpful information from the survey. The survey platform was Survey Monkey, and staff were not dismissive of the utility of this type of user survey.

Intentions for ongoing stakeholder engagement:

The CE staff anticipate continuing engagement of stakeholders, even after the redesigned Consumer Expenditure Survey has been implemented. In particular, the interactive webpage will be updated and remain a communication tool to reach stakeholders.

Developers of the documentation, users' guides, and workshop materials for the redesigned survey will take advantage of knowledge that has been compiled on stakeholder concerns.

Stakeholders have proposed additional aids that may help with the transition from the current data collection to the new data collection. Suggestions include creation of a synthetic dataset, a test data set, and sample programs to enable stakeholders to be prepared for the new CE data.

General assessment of process:

Overall, Consumer Expenditure staff are very pleased with the level of engagement and the productive feedback of stakeholders. The degree of change in this major redesign of the survey necessitates a long timeline, many opportunities for stakeholder input along the way, and a significant commitment of BLS resources to assure that the survey meets the needs of the wide range of stakeholders. The CE experience is unusual in the level of effort to include stakeholders on a continuous basis over the redesign period, a luxury not likely available to many surveys. On the other hand, the CE variety of stakeholder activities provides valuable information on the relative usefulness of the different techniques.

The American Community Survey (Sally Obenski, Special Assistant, Office of the Associate Director; Gary Chappell, Senior Project Manager, American Community Survey Office)

The issue:

The American Community Survey reached full implementation in December 2010 with the first release of the five-year estimates. In April 2011 the Census Director called for a comprehensive program review involving both internal and external processes. Among the components of the review was a Communications and Stakeholder Engagement Review with the following objectives (ACS Program Review Final Report, May 2013):

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1. Gather feedback on engagement and outreach strategies from stakeholders.
2. Determine if the ACS program communicates about the survey and its data effectively.
3. Using the results of the review, develop and implement a manageable and appropriate engagement approach for a wide array of stakeholders.

The effort was primarily focused on identifying stakeholders and assessing their understanding of the ACS program and how to develop effective communication channels with stakeholders. Another component of the overall Program Review where stakeholders are affected by decisions was the Data Products Review. A related activity that evolved from the ACS Program Review was a comprehensive review of ACS questionnaire content. In both the Program Review and the Content Review, the Census Bureau took specific steps to measure stakeholder needs and uses of the data.

I provide these specific examples of ACS effort to incorporate stakeholders in the Program Review. There has been ongoing interaction with the broad range of stakeholders – from Congress, to other Federal agencies, to external data users – throughout the development and implementation of ACS.

Approaches used to engage stakeholders:

The Census Bureau was systematic in reviewing communications and stakeholder communications in the ACS program, through the following broad steps:

1. Developed an inventory of ACS stakeholders. Over the years, different lists of organizations and individuals who were users of and affected by ACS data and data collection had emerged. The lists were compiled, i.e., a “wider net was cast,” contacting different organizations such as academic partners, OMB, and divisions within the Census Bureau (e.g., Population Division and Social, Economic, and Housing Statistics Division).
2. Categorized stakeholders, who vary in their stakes in the data (the reasons for needing the data) and in their influence and expertise (how big a player in the ACS data world). In order to identify appropriate levels of inclusion and communication by this variation, the review team created a 2x2 matrix of Stake in Issue and Influence/Expertise by Hi/Lo. This is an example of using *Power, Legitimacy, and Urgency* to categorize stakeholders. It is a practical way to organize thinking about how to allocate resources appropriately.
3. Developed a tiered strategy for stakeholder engagement for each of the four categories of stakeholders.
4. Used the stakeholder tiers to allocate communications and resources. Additional guidance came from the ACS Strategic Plan as to the goals and objectives for the program overall. This meant that stakeholder strategy for particular stakeholder groups was dependent on both the existing level of involvement and Census Bureau interest in increasing stakeholder involvement (e.g., the business community).

In order to clarify the tasks, timeline and responsibilities to complete the Communications and Stakeholder Engagement Review, staff developed a project plan. Major phases of the project were noted (e.g., Conduct Environmental Scan/Data Call of Communications Materials) and specific tasks within these phases were noted, using the technique in which individuals or groups are assigned the roles of Responsible, Accountable, Consulted, and Informed (RACI).

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Stakeholders were also instrumental in the Data Products Review. The Census Bureau conducted two workshops to gather input on whether ACS products were meeting the users' needs – a Federal Data Users Workshop and a Non-Federal Data Users Workshop. The latter was organized by the National Academy of Sciences, Engineering, and Medicine (National Research Council, 2013). The intent of these workshops was “to increase ACS program stakeholders’ understanding of how ACS products meet their needs” (ACS Program Review Final Report 2013: 10).

For the ACS Content Review, again, a very systematic process to understand stakeholders was used. In this case, one of the objectives was to define a Census Bureau process to validate the ongoing need – in light of heightened concerns over respondent burden – to continue asking each survey question.

1. Jointly with OMB, the Census Bureau chartered the Interagency Council on Statistical Policy (ICSP) Subcommittee on the American Community Survey “to oversee policies guiding the development and maintenance of content for the survey” (ACS Fiscal Year 2014 Content Review Results: Final Report 2015). The subcommittee developed a method to evaluate questions using 19 specific, quantifiable decision criteria along the dimensions of:
 - Mandatory (statutory), required (federal law or implementing regulation required use of specific data), or programmatic (the data were necessary for agency operational needs)
 - Level of geography of estimates (block group/tract, county, state/national)
 - Difficulty and cost of data collection.
2. The criteria necessitated the gathering of data to calculate the 19 measures for each question. Nine data sets were collected, some of which required gathering information from stakeholders:
 - Federal Agency Data Uses: Census Bureau sponsored a federal agency summit to brief the agencies on the review and the information the agency needed to provide. An online tool was developed to facilitate collection of this information during the 6-week period that followed.
 - Federal Agency Other Data Sources: Federal agencies were asked to report what other sources of the data were available to them
 - Computation of Questions’ Estimates Coefficients of Variation
 - Computation of Questions’ Estimates Interquartile Ranges
 - ACS Used as Another Survey’s Sampling Frame: list of other surveys that use ACS as sampling frame
 - Survey of Interviewers: 1,100 Census Bureau interviewers were surveyed on perception of respondent cognitive burden, questions that were overly sensitive, and overall assessment of question difficulty.
 - Median Seconds to Answer: measured from audit trails of automated interviews
 - Allocation Rates: based on editing process.
 - Complaints: complaints about ACS received by the Census Bureau that came from multiple sources.
3. An elaborate algorithm was specified to calculate a question score with values from 0 to 100. Questions were plotted in four quadrants defined by High or Low Benefit vs. High or Low Cost.
4. Questions in the Low Benefit/Low Cost and Low Benefit/High Cost were analyzed for possible exclusion and seven questions were identified for removal.

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5. After this process was completed, the Census Bureau held a series of briefings on the results of the review, including a webinar for all federal agencies, and a specific briefing for those agencies affected by the proposed removal of questions, and the ICSP subcommittee.
6. A 60-day *Federal Register* notice was issued for public comment. Federal agencies were encouraged to go on record with written comments to the *Federal Register* or to the Census Bureau directly. A 30-day *Federal Register* notice then announced the Census Bureau's final recommendation to OMB to remove just one question based on consideration of these public comments.⁶

A separate effort to gather information from ACS data users was conducted for 6 weeks in the summer of 2014, when an online "Feedback Form – ACS Content Review" was posted on the Census Bureau ACS website. Data users were asked to indicate up to 5 questions they considered to be the most useful on the ACS. Results of this survey were not released publicly; however, 932 responses were received representing 3,405 questions (since up to 5 questions could be selected per response), distributed among the following categories of data users: Business, Federal, Media, Nonprofit, Other Planning, Tribal Agency, Tribal Official, Congress, and Blank (per email from Gary Chappell).

Outcomes of stakeholder engagement techniques:

The Communications and Stakeholder Engagement Review was intended to improve Census Bureau communications with stakeholders. The ACS Program Review Final Report 2013 identifies a number of key accomplishments of the review, particularly related to better understanding of stakeholder needs and expectations, and development of integrated communication plans in response to weaknesses found in the previous process for identifying, communicating, and providing products to stakeholders. The Communications and Stakeholder Engagement Review emphasized improving ACS education of stakeholder audiences through gathering feedback from stakeholders on ACS engagement strategies and determining ACS communications effectiveness to improve engagement approaches. The Data Products Review "indicated no specific stakeholder concerns about data products" (ACS Program Review Final Report 2013: 10). Again, emphasis in the approach of the review was on educating the stakeholders. One forum for stakeholder input as a result of the reviews was the establishment of an ongoing ACS Data Users Group, managed by an outside contractor, "to increase stakeholders' understanding of how to use ACS data, provide a means for ACS users to share their experiences in using the data with each other, and create a channel for data users to communicate their needs to ACS program managers" (ACS Program Review Final Report 2013: 11).

The ACS Content Review was heavily driven by metrics to measure the relative value of each question in the survey. The outcome of this process was objective and quantified. The *Federal Register* notice 60-day period at the end of the resource-intensive metric-driven review process produced stakeholder input that resulted in the decision to *not* eliminate 6 of the 7 questions. One can only conclude that the

⁶A supplemental 30-day notice announced removal of one additional question unrelated to the Content Review based on late-breaking research results; OMB approved these content changes on June 30, 2015. <https://federalregister.gov/a/2015-13061>

quantitative process, while informative, was not sufficient to make the decision on which questions to eliminate. The quantitative evaluation mechanism did not adequately capture all the “permutations” of the evaluation criteria and questions proposed for elimination were retained that are very important to a large number of users. The Census Bureau received nearly 1,700 comments in response to the notice.⁷ Part of this was due to stakeholders’ mobilization to ensure that sufficient comments were received for reconsideration of the decision.

While the online data users feedback form was informative to staff, its use was limited in providing new information to the ACS staff.

Intentions for ongoing stakeholder engagement:

The Stakeholder Inventory is now a resource for further initiatives moving forward.

Although the Program Review project appeared to be focused on improving the provision of information to stakeholders, ACS’ commitment to be responsive to stakeholders is evidenced in *Agility in Action: A Snapshot of Enhancements to the American Community Survey* August 2015 revision. The overarching purpose is “to ensure that our customers trust and value the survey” (p. 5). All of the nine specific initiatives, listed below, will benefit stakeholders in some way.

1. Identifying and Using Data Collected by Other Federal Agencies
2. Reducing In-Person Follow-up Contact Attempts
3. Crafting New Survey Mail Package Messages
4. Evaluating Changes to Survey Questions
5. Communicating with Customers on Why We Ask Questions
6. Increasing Our Awareness on How Customers Use ACS Data
7. Obtaining Expert Guidance
8. Leveraging the Respondent Advocate to Resolve Respondent Concerns
9. Communicating Strategically

The Census Bureau has contracted with the National Academy of Sciences, Engineering, and Medicine to conduct a series of workshops on the ACS over the next year. The Data Users Group, externally managed, continues to be active. ACS staff are in continuous contact with key advocates, keeping a thumb on how agencies use ACS data.

As Sally Obenski noted, the changing survey climate provides many reasons for continued stakeholder involvement. Response rates are declining; the need for data is increasing; and new ways of collecting data – adaptive design, big data, and administrative records are emerging.

⁷ *Federal Register* <https://www.federalregister.gov/articles/2014/10/31/2014-25912/proposed-information-collection-comment-request-the-american-community-survey-content-review-results>

General assessment of process:

The Communications and Stakeholder Engagement Review process required substantial time and effort to complete, but appears to have resulted in improving the Census Bureau's commitment to active and ongoing stakeholder activity.

Every effort was made throughout the Communications and Stakeholder Engagement process to be as transparent as possible, with frequent communication through many different channels with stakeholders. For example, a Working Group of the National Advisory Committee was chartered in summer 2014 to provide qualitative feedback from non-federal data users alongside the quantitative process. The Census Bureau also provided several dozen briefings and presentations to many stakeholder organizations with a vested interest in the ACS throughout the period. There was considerable involvement of Department of Commerce executives in decisions. The reasons for this are unclear and likely reside in interactions between Census Bureau and Commerce Department executives.

The manager-stakeholder relationships were thoughtfully organized and analyzed in the Program Review through the use of the Stakes X Influence matrix to categorize stakeholders. This was a success.

Successful stakeholder incorporation is measured by the activity of the managing organization and the stakeholders. ACS made determined efforts to obtain stakeholder feedback, and yet stakeholders did not always step forward when asked for input, resulting in low response, response by a vocal minority, or response from only the usual core group of stakeholders. This illustrates the challenge of developing well-planned fully representative stakeholder engagement techniques that will assure active dialogue between managers and stakeholders. At times, asking for input is not enough. Actions such as creation of the ACS Data Users Group, formed in 2013, or the more recently formed ACS Data Products Redesign Group, formed in 2015, provide ongoing forums for dialogue.

The Commercial Buildings Energy Consumption Survey (Eileen O'Brien, Team Leader, Buildings Surveys Statistics Team)

The issue:

The U.S. Energy Information Administration (EIA) conducts the Commercial Buildings Energy Consumption Survey (CBECS) on a four-year cycle, and offers the only national, statistically representative data on energy demand within the commercial sector. CBECS studies commercial buildings and their energy suppliers to measure changes in the building stock, energy uses and efficiency to project future energy needs. As awareness of the data has grown over the years, so did the number of stakeholders and applications of the data. For example, CBECS serves as the energy benchmark in ENERGY STAR, LEED®, Green Globes® and other green building rating systems. In addition to assigning a score to a building's performance, these ratings can affect building occupancy and leasing rates, and value at sale, especially in competitive real estate markets. Major flaws in the design and implementation of the CBECS 2007 sample resulted in a very limited data release, well below stakeholder expectations. At that time, EIA contracted with the National Academy of Sciences,

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Engineering, and Medicine to convene a panel on improving the consumption data program overall, but with specific attention to improve the 2012 CBECS (National Research Council 2012). These factors together resulted in significant redesign of the survey that included:

- A 50 percent increase in sample size
- An additional collection mode for a portion of interviews
- Incorporation of a post-interview energy assessment of 200 buildings
- Substantive updates to the building questionnaire
- Web as the principal mode for energy supplier reporting
- Updated engineering parameters in the model for estimating energy end uses
- Increased use of corporate-level reporting for multi-building owners
- Extensive mid- and post-collection interviewer debriefing sessions

EIA conducted an extensive outreach effort with stakeholders to seek input on the 2012 questionnaire.

Approaches used to engage stakeholders:

EIA gathered stakeholder input through meetings with various groups, public webinars, solicitation of written comments, and a *Federal Register* notice. Specifically, CBECS staff:

- Met with the Office of Water, Environmental Protection Agency
- Met with industry representatives from 4 major professional associations
- Hosted a meeting with the Real Estate Roundtable and U.S. Green Building Council to discuss the CBECS questionnaire in detail
- Attended a roundtable discussion of CBECS for interested members of the building community hosted by The National Institute of Building Sciences
- Spoke at a meeting of the Federal Energy Management Program (CBECS Survey Manager)
- Conducted follow-up with members of associations that had submitted written recommendations
- Conducted a webinar for the DOE Office of Energy Efficiency Commercial Buildings Energy Alliances to provide key milestones and provide ways users could submit feedback on the questionnaire
- Gave multiple briefings to the Energy Subcommittee of the American Statistical Association
- Hosted a stakeholder workshop in which EIA presented their proposed questionnaire changes and requested final input from stakeholders. About 60 individuals representing a wide range of stakeholder groups attended either in-person or by webinar. The event was widely publicized by e-mail invitation and on the EIA website.
- Published a *Federal Register* notice to allow for public comment on the proposed changes.

Outcomes of stakeholder engagement techniques:

A number of questionnaire changes were the result of specific input from stakeholders. According to the EIA Supporting Statement Part A of their OMB filing, 19 of the 38 listed specific questionnaire changes were the result of stakeholder request (Supporting Statement Part A for Forms EIA-871A-J,

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September 2012). Stakeholders are kept informed about the CBECS schedule and milestones throughout the project cycle via a CBECS Blog on the EIA website, authored by the survey manager.

EIA received only one comment in response to the *Federal Register* notice. Some organizations provided substantial input directly to EIA, preferring this channel of communications about the proposed changes.

Intentions for ongoing stakeholder engagement:

The industry associations that rely on CBECS appear to be active and committed stakeholders who willingly participate in EIA discussion of issues. EIA reciprocates with inviting and inclusive activity to engage stakeholders, using association meetings, individual meetings, webinars, and reporting out information via the web and other platforms.

General assessment of process:

EIA successfully used stakeholders for education and input on questionnaire content, updates and revisions and to manage expectations as to what could be achieved in the survey redesign.

Eileen O'Brien summarized a mindset that agencies might use to deal with stakeholders – “don’t approach with an ‘anticipatory grief’ attitude”, that is, expecting the stakeholders will be unhappy and that the agency needs to counteract their expectations. Being open to their expertise typically strengthens the data collection. CBECS serves a broader base of data users than was conceived four decades ago when EIA was formed. Stakeholder interests are too diverse to collect their own data, produce data of similar quality and make it freely available. Because there are inherent difficulties in measuring energy demand in commercial buildings, intensive stakeholder outreach ensures that CBECS retains its relevance and validity and that the survey continues to evolve as part of EIA’s larger consumption data program.

The National Study of Long-Term Care Providers (Lauren Harris-Kojetin, Chief, Long-Term Care Statistics Branch, NCHS)

The issue:

The National Center for Health Statistics (NCHS) has historically managed two nationally representative surveys measuring three long-term care sectors, and more recently added three one-time surveys of additional sectors or workforce. NCHS identified concerns about the data collection that included the long gaps between data collection, as much as 10 years for some surveys, the financial pressures on conducting five separate in-person surveys that was not sustainable, the desire to add emerging sectors in an on-going way, and the recognition that there was some overlap in the data collected through the surveys and that of the Centers for Medicare and Medicaid Services (CMS). In response to the NCHS Board of Scientific Counselors evaluation of the program in 2009, the decision was made to integrate data collection across the long-term care sectors, and to include five major sectors in an on-going way. Some of the data would be derived from CMS administrative data and an integrated new biennial survey

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would collect common core elements as well as critical information on the supply, use and trends in long-term care facilities.

Advantages of this approach included the pooling of financial resources to assure regular timely data collection for all sectors, more frequent data collection (every 2 years), adding the ability to produce both state and national estimates, and comparability of data *across* sectors by nature of the common data collection time and process. These features were compelling for the stakeholders.

In order to achieve these goals, the new survey would be conducted by mail and web, with telephone follow-up. This necessitated a reduction in respondent burden time from hours to 30-40 minutes and resulted in the need to cut survey content by approximately 70 percent. This level of change made it very important to NCHS to include stakeholders in the decision process.

Approaches used to engage stakeholders:

NCHS decided to conduct a one-day facilitated workshop of 42 members from a wide range of stakeholder groups. Starting with a list of approximately 1000 people culled from listservs and compiled from staff knowledge of active, interested stakeholders, an invited participant list was compiled of stakeholders from government agencies, service provider organizations, academic institutions, foundations, and policy-related organizations. This process took several months. The number of workshop members was to be kept to a manageable number for effective workshop interaction and representative of all stakeholder groups.

There was executive commitment to hear from stakeholders, the beneficiaries of the data, before NCHS finalized the survey questionnaire. The NCHS Director, the NCHS Associate Director for Science, and the Director of the Division of Health Care Statistics endorsed and spoke at the workshop.

The workshop was designed with a specific, well-defined task – prioritize the critical content to be included in the questionnaire. In fact, NCHS had already culled possible content within four broad topic areas (provider services, provider staffing, policy-relevant provider practices, and aggregate service user characteristics) which defined four cycles of discussion during the workshop day.

Important aspects of the workshop include:

- The workshop objective was clear and well defined – prioritize the list of possible content that had been culled by agency staff ahead of time.
- Participants were assigned ahead of time into small groups with each group's members representing different stakeholder segments.
- An expert in organizational change was used to facilitate the work group who was unbiased, experienced in managing a diverse group of participants, and had a real-time voting mechanism that allowed for tabulating prioritization votes.
- Established a shared understanding of the survey vision through pre-workshop mailings, and introductory speakers who informed participants of the decisions and reasoning of the new survey design that had already been accomplished. The work group was used for a specific task - to identify what *additional content* should be added.

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- The day's sessions resulted in a prioritized list of what data to collect under collaborative discussion across stakeholders.

Outcomes of stakeholder engagement techniques:

The workshop resulted in a prioritized list of content items to include in the questionnaire by the four broad topic areas. Less tangible benefits shared with me included the increased understanding of stakeholder needs, perspectives, and expectations among the stakeholder groups and with the NCHS staff. For example, a participant with an interest in alternative medicine was able to present his views and discuss it with other participants, even though his topic was not prioritized for inclusion in the survey.

The newly designed survey was implemented in 2012 and the results were well received. A *USA Today* story on the results summarized an important stakeholder benefit: "The first-ever compilation of federal data profiles the five types of long-term care providers in 2012" (Harris-Kojetin 2014).

Intentions for ongoing stakeholder engagement:

Similar to other federal surveys, NCHS recognizes that it is good at getting stakeholder involvement when there is a major survey redesign. Like other agencies, there is frequent dialogue with active, vocal stakeholders in the survey. Now steps are being taken to be more aware of how to continually engage a broad array of stakeholders in decisions. An example of this is exploring the feasibility of collecting person-level data about individuals served by long term care facilities, a feature of past surveys that had to be dropped in the 2012 redesign. There is a large group of stakeholders who use these data and will provide valuable input.

In updating the questionnaires for subsequent waves since 2012, there has been regular communication, often informal, with key stakeholders such as the National Adult Day Services Association, some workshop participants with particular expertise, and other active researchers on long term care. They provide input in determining product topics and provide outreach to the target respondent population to increase survey participation.

The Long-Term Care Statistics Branch has begun monitoring web page hits on their site, as an indicator of where users were most active and their information interests. They observed a pattern of users taking different multi-click routes to find a particular page, which led to revising a page to provide a direct link.

Stakeholders can also help other stakeholders. Provider associations are helping to work with lower tier stakeholders by reformatting data from the 2012 wave of data to compare national and state metrics in a way that is more useful to them.

The Long-Term Care Statistics Branch is continuing to inform and seek input from other stakeholder federal agencies, such as the Centers for Medicare and Medicaid Services, through meetings to raise awareness about NSLTCP and its products and obtain feedback on how NSLTCP data and products may be of use in their work. This is another mechanism for continual stakeholder engagement.

General assessment of process:

The workshop was deemed a success by NCHS staff. As important, workshop participants were asked to evaluate their satisfaction on four dimensions, using a 5-point scale from strongly agree to strongly disagree:

- Satisfaction with outcome
- Satisfaction with process
- Confidence in having an impact on final survey
- Willingness to give further input

The evaluation was overwhelmingly positive, with some dissension that could provide guidance for future planning of workshops.

National Agricultural Statistics Service Ongoing Surveys: generalized (Carol House, former NASS Deputy Administrator for Programs and Products, currently at the National Academy of Sciences, Engineering, and Medicine)

The issue:

NASS produces over 500 national reports and 9,000 state reports that serve a wide range of data users. Data that are released from surveys vary in the purpose in how they are used, which drives the prioritization by NASS in release of data products to meet stakeholders' needs. For example, data are prioritized as follows for release:

- Principal economic indicator
- Required by law
- Used by agency
- Prioritization of remaining data may be forced by budget constraints

Approaches used to engage stakeholders:

NASS highly values communication with its stakeholders to ensure the stakeholders receive the data that they need and that the stakeholders are clear on NASS processes and procedures. Some of the tools that NASS uses regularly to manage stakeholders are:

- Monthly calendar with day and time of data release; meeting deadlines is expected and drives performance, used as a performance metric in evaluations
- Advisory Committee under FACA rules; meetings are open to the public, committee members are recruited across broad group of stakeholder sectors and carefully vetted, new member must be approved by the Secretary of Agriculture; stakeholder sectors included, e.g., academia, commodity organizations, farmers; meetings were carefully orchestrated.
- Informal stakeholder input

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- Annual data user meetings across data user sectors, 100+ attendees, jointly learn and discuss changes; when resulted in unexpected change, meetings were a forum to manage “anger”; users were very interested in changes and typically half of the floor time is devoted to floor discussion.
- Other data user meetings, e.g., commodity association meetings
- Email list of data users and encouragement to pass the notices on to others to reach a broad range of possible stakeholders.
- Informal meetings with key stakeholders, often meetings occur a couple of times a week, “happening all the time”
- Electronic platforms including their website (primarily for outward communication with contact information) and some use of Twitter. NASS considered establishing a blog for communication among data users, but after open discussion within NASS, they decided not to use this platform due to the risk of unmanaged, unsupervised discussion without 24/7 support from NASS to avoid misinformation.

Outcomes of stakeholder engagement techniques:

The production of market sensitive data is a critical driver of how data releases are managed and the protection of releases is expected by stakeholders. NASS is dedicated to meeting this expectation and its communication strategy helps to keep all stakeholders informed.

As a result of budget pressures over the years, NASS has been able to produce data products for stakeholders that were at risk of being defunded. Trust funds are used to increase funding for data collection. Different commodity groups can contribute money into the fund to assure the production of more detailed estimates, for example, for specific subcategories of a commodity or for smaller area geographies. There are no special privileges to trust funders in terms of data access or use. This is a successful way to address stakeholder needs.

Similarly, NASS helps to stretch resources by collaborating with state level agricultural departments to support state specific resources to enable additional statistical data, such as county-level estimates.

Intentions for ongoing stakeholder engagement:

NASS will continue its commitment to stakeholders. For example, in planning for the Census of Agriculture, it is important to meet with commodity groups in *their* venue to reinforce the importance of their participation in the census.

General assessment of process:

As noted by Carol House (personal conversation), “communication is key.”

Communications need to be tailored, which may require NASS marketing staff meeting with the stakeholder organization’s marketing staff. The intent is to go to the stakeholder, establish trust, and build a relationship to get the stakeholder engaged.

Appendix B: Additional Stakeholder Theory Notes

Seven Types of Stakeholders

Mitchell, Agle and Wood (1997) describe seven types of stakeholders as various combinations of the attributes of power, legitimacy, and urgency which affect the saliency of the stakeholder to managers. These seven types are worth noting, as they pertain to the broad range of survey stakeholders from Congress to survey respondents. Stakeholders differ in their power, legitimacy and urgency relative to a decision.

- 1) *Definitive Stakeholders* possess power, legitimacy, and urgency. Congress and other offices responsible for executing congressionally mandated data collection, such as OMB, are of this type.

Expectant Stakeholders possess two of the three attributes. It can be argued that in the public sector, all stakeholders have some degree of power, legitimacy, and urgency, but stakeholders can vary in the degree of each.

- 2) *Dominant stakeholders*: possess both power and legitimacy and are assured influence on the organization, often through a formal mechanism in place to recognize their relationship. For example, stakeholders within the home agency such as operations staff or survey analysts.
- 3) *Dependent stakeholders*: possess legitimacy and urgency but lack power. They depend on advocacy of other stakeholders or the guidance of the organization's management values. Federal statistical agency examples include stakeholder agencies that depend on the work of another agency, such as an agency that uses the American Community Survey, managed by the Census Bureau; external survey data users, such as some academic analysts; and survey respondents.
- 4) *Dangerous stakeholders*: possess urgency and power, but lack legitimacy. They use coercion. While more difficult to apply to the public sector, potential political influence on statistical agency decisions may be an example.

Latent Stakeholders are those that possess only one of the three attributes, whether so defined by the stakeholder or the manager. Among this group are:

- 5) *Dormant stakeholders*: possess power to impose their will, but do not have a legitimate claim or an urgent claim. For example, a stakeholder who can command the attention of the news media, such as an uninformed respondents gaining media attention to attack a survey.
- 6) *Discretionary stakeholders*: possess legitimacy but no power or urgency. Some data users and groups of respondents may fall into this group.
- 7) *Demanding stakeholders*: possess urgency but neither power nor legitimacy, a category that does not easily apply in the public sector.

Eight Features of Best Practice

The activities to engage stakeholders should contribute directly to the decision making process with the efficient use of resources by the managing agency. Reed (2008) identifies eight features of best practice:

1. Stakeholder participation needs to be underpinned by a philosophy that emphasizes empowerment, equity, trust and learning.
2. Where relevant, stakeholder participation should be considered as early as possible and throughout the process.
3. Relevant stakeholders need to be analyzed and represented systematically.
4. Clear objectives for the participatory process need to be agreed among stakeholders at the outset.
5. Methods should be selected and tailored to the decision-making context, considering the objectives, type of participants and appropriate level of engagement.
6. Highly skilled facilitation is essential.
7. Local and scientific knowledge should be integrated.
8. Participation needs to be institutionalized.

Appendix C: Stakeholder Research Questions

It is difficult to identify “best practices” in managing stakeholder expectations in ongoing surveys. Survey organizations could greatly benefit from systematic research and sharing of practices. There are many research questions to address that could be formulated around the broad steps to manage stakeholders:

1. Identify and Categorize Stakeholders
 - a. What are the appropriate attributes to categorize stakeholders?
 - b. Should the categorization vary by management issue?
 - c. How does the categorization strategy affect the decision?
2. Specify the Goals and Objectives in Stakeholder Engagement
 - a. How should goals and objectives be set? What is the role of the stakeholders?
 - b. What is the appropriate balance between long term goals and short-term objectives in determining expected outcomes?
 - c. What are the specific tasks to which stakeholders are to contribute?
3. Develop appropriate communication strategies for stakeholder groups
 - a. What are the stakeholder characteristics that relate to appropriate communication methods?
 - b. What is the effectiveness of different communication methods with different types of stakeholders?
 - c. How should communication strategies be combined to efficiently and effectively achieve the objective?
 - d. What is the cost/benefit of communication strategies with different types of stakeholders?
4. Establish ongoing commitment and processes for stakeholder engagement at appropriate levels to facilitate management decisions.
 - a. What is the cost/benefit of engaging stakeholders in decisions?
 - b. What organization infrastructure best supports ongoing commitment?

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