

The Census Bureau Needs to Improve Its Performance Management Processes and Quality Control Program for the Reimbursable Surveys Program

FINAL REPORT NO. OIG-23-025-A

August 30, 2023

The Census Bureau's Disclosure Review Board and Disclosure Avoidance Officers have reviewed this information product for unauthorized disclosure of confidential information and have approved the disclosure avoidance practices applied to this release. (CBDRB-FY23-0263)



U.S. Department of Commerce
Office of Inspector General
Office of Audit and Evaluation



August 30, 2023

MEMORANDUM FOR: Robert Santos
Director
U.S. Census Bureau

A handwritten signature in black ink, appearing to read "Arthur L. Scott, Jr.".

FROM: Arthur L. Scott, Jr.
Assistant Inspector General for Audit and Evaluation

SUBJECT: *The Census Bureau Needs to Improve Its Performance Management Processes and Quality Control Program for the Reimbursable Surveys Program*
Final Report No. OIG-23-025-A

Attached is our final report on our audit of the U.S. Census Bureau's (the Bureau's) Demographic Programs Directorate's reimbursable surveys. Our overall objective was to determine whether reimbursable surveys conducted by this directorate provided quality and reliable data to help sponsoring federal agencies make informed decisions. As part of this review we (1) determined whether quality metrics were met or exceeded, (2) determined whether quality assurance processes were working as intended, and (3) assessed the impact of data quality issues on survey sponsors.

We found that while the Bureau has established controls along with performance and quality metrics to ensure the quality of survey data, it does not consistently follow or achieve them. Specifically, we found that

- I. The Bureau needs to improve performance management processes for reimbursable surveys.
 - A. The Bureau did not meet data collection targets and faces declining response rates.
 - B. The Bureau did not meet performance measurement goals for diary placement and telephone interview rates.
- II. The Bureau needs to improve its quality assurance program for reimbursable surveys.
 - A. The Bureau did not meet reinterview (RI) completion goals and RIs were not completed timely.
 - B. The Bureau did not investigate cases with discrepancies for falsification.
 - C. The Bureau did not adequately document or timely complete falsification investigations.
 - D. The Bureau did not rework Current Population Survey cases completed by field representatives (FRs) with confirmed falsifications.

- III. Regional offices did not relieve FRs from survey data collection during falsification investigations and systematically track confirmed falsifications for use in future hiring decisions.

On August 2, 2023, we received the Bureau's response to our draft report. In response to our draft report, the Bureau concurred with all our recommendations and described actions it has taken, or will take, to address them. The Bureau also provided technical comments. We considered these comments and made changes in the final report where appropriate. We have included the Bureau's formal response within the final report as appendix E.

Pursuant to Department Administrative Order 213-5, please submit to us an action plan that addresses the recommendations in this report within 60 calendar days. This final report will be posted on our website pursuant to sections 4 and 8M of the Inspector General Act of 1978, as amended (recodified at 5 U.S.C. §§ 404 & 420).

Pursuant to Pub. L. No. 117-263, Section 5274, non-governmental organizations and business entities specifically identified in this report have the opportunity to submit a written response for the purpose of clarifying or providing additional context to any specific reference. Any response must be submitted to Terry Storms, Division Director, at tstorms@oig.doc.gov and OAE_Projecttracking@oig.doc.gov within 30 days of the report's publication date.

The response will be posted on our public website at <https://www.oig.doc.gov/Pages/Audits-Evaluations.aspx>. If the response contains any classified or other non-public information, those portions should be identified as needing redaction in the response and a legal basis for the proposed redaction should be provided.

We appreciate the cooperation and courtesies extended to us by your staff during our evaluation. If you have any questions or concerns about this report, please contact me at (202) 577-9547 or Terry Storms, Division Director, at (202) 570-6903.

cc: Colleen Holzbach, Program Manager for Oversight Engagement, Census Bureau
Corey J. Kane, Audit Liaison, Census Bureau
Kemi A. Williams, Program Analyst for Oversight Engagement, Census Bureau
Ken White, Audit Liaison, OUS/EA
MaryAnn Mausser, Audit Liaison, Office of the Secretary
Christiann Burek, Acting Deputy Chief of the Employment and Labor Law Division
Phyllis Barker, Senior Privacy Attorney, Mathematica



Report in Brief

August 30, 2023

Background

The U.S. Census Bureau (the Bureau) serves as the nation's leading provider of quality data about its people and economy. Though it is well known for carrying out the Decennial Census of Population and Housing every 10 years, it also conducts more than 130 other surveys of households and businesses each year. Data collected from these surveys measure changing demographics and economic conditions and are used in political, economic, and social policymaking decisions. These surveys are funded by direct Congressional appropriations or federal agencies on a reimbursable basis and provide periodic and comprehensive statistics across a range of sectors.

Demographic reimbursable surveys are some of the most important surveys conducted by the federal government. In fiscal year (FY) 2021, the Bureau obligated \$386 million for reimbursable surveys.

The reimbursable surveys we reviewed as part of this audit included the American Housing Survey, Consumer Expenditure Survey (CE), and Current Population Survey (CPS). We focused on reimbursable surveys that have an in-person or telephone data collection component, a high dollar cost, a large sample size, and a high impact on the U.S. economy, and that were carried out by divisions within the Demographic Programs Directorate during FYs 2019–2021.

Why We Did This Review

Our overall audit objective was to determine whether reimbursable surveys conducted by this directorate provided quality and reliable data to help sponsoring federal agencies make informed decisions. As part of this review, we (1) determined whether quality metrics were met or exceeded, (2) determined whether quality assurance processes were working as intended, and (3) assessed the impact of data quality issues on survey sponsors.

U.S. CENSUS BUREAU

The Census Bureau Needs to Improve Its Performance Management Processes and Quality Control Program for the Reimbursable Surveys Program

OIG-23-025-A

WHAT WE FOUND

We found that while the Bureau has established controls along with performance and quality metrics to ensure the quality of survey data, it does not consistently follow or achieve them. Specifically,

- I. The Bureau needs to improve performance management processes for reimbursable surveys.
 - A. The Bureau did not meet data collection targets and faces declining response rates.
 - B. The Bureau did not meet performance measurement goals for diary placement and telephone interview rates.
- II. The Bureau needs to improve its quality assurance program for reimbursable surveys.
 - A. The Bureau did not meet reinterview (RI) completion goals and RIs were not completed timely.
 - B. The Bureau did not investigate cases with discrepancies for falsification.
 - C. The Bureau did not adequately document or timely complete falsification investigations.
 - D. The Bureau did not rework CPS cases completed by field representatives (FRs) with confirmed falsifications.
- III. Regional offices did not relieve FRs from survey data collection during falsification investigations and systematically track confirmed falsifications for use in future hiring decisions.

WHAT WE RECOMMEND

We recommend that the Director of the U.S. Census Bureau

1. Evaluate alternative strategies to achieve target response rates, particularly in underrepresented units.
2. Establish internal response rate targets to ensure CE estimates are accurate and precise.
3. Periodically review statistical measures for managing nonresponse to ensure measures are updated and appropriately communicated to stakeholders in a timely manner.
4. Develop strategies to address respondent refusal in the next Consumer Expenditure Diary (CED) survey redesign.
5. Ensure that regional offices adhere to prescribed telephone interview rates or work with the Bureau of Labor Statistics to adjust them as needed.
6. Ensure all surveys and regional offices maximize the use of data analysis and monitoring tools to oversee survey quality and performance.
7. Ensure RI requirements are met and completed in a timely manner.
8. Reevaluate the effectiveness of the CED survey RI lag time metric.
9. Establish a policy and criteria for discrepancy adjudication to determine when cases should be referred for investigation.
10. Ensure that falsification investigation requirements are met and completed in a timely manner.
11. Issue a formal policy explaining the falsification investigation process and specifying the documentation required to support the investigation's findings and outcome.
12. Ensure that staff are trained on completing adequate falsification investigations.
13. Strengthen the quality control plan for the CPS by evaluating cases worked by FRs with confirmed falsifications to assess the impact on survey estimates.
14. Ensure that Bureau officials follow Bureau policy to immediately relieve FRs of all survey work if their potential falsification cannot be cleared with a preliminary investigation to ensure they do not continue to collect survey data.
15. Implement a system for tracking FRs with confirmed falsifications so that applicants for FR positions can be appropriately vetted prior to reemployment.

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Cover: Herbert C. Hoover Building main entrance at 14th Street Northwest in Washington, DC. Completed in 1932, the building is named after the former Secretary of Commerce and 31st President of the United States.

Background

The U.S. Census Bureau (the Bureau) serves as the nation's leading provider of quality data about its people and economy. Though it is well known for carrying out the *Decennial Census of Population and Housing* every 10 years, it also conducts more than 130 other surveys of households and businesses each year. Data collected from these surveys measure changing demographics and economic conditions and are used in political, economic, and social policymaking decisions. These surveys are funded by direct Congressional appropriations or federal agencies on a reimbursable basis and provide periodic and comprehensive statistics across a range of sectors.

Demographic reimbursable surveys¹ are some of the most important surveys conducted by the federal government. The Bureau's Demographic Programs Directorate² carries out social and household-related surveys on behalf of other federal agencies known as reimbursable sponsors³ to provide quality data about the nation's unemployment rate, the consumer price index (CPI), and definitive statistics on crime and other important aspects⁴ of a thriving society. In fiscal year (FY) 2021, the Bureau obligated \$386 million for reimbursable surveys.

The Bureau employs thousands of field representatives (FRs) throughout the United States to interview households or persons at preselected addresses. At fixed intervals (such as monthly or quarterly), FRs assigned to the Bureau's six regions nationwide collect data in person or via telephone from U.S. households included in each survey. After FRs complete the interviews, a selection of original interviews undergoes a quality control check called reinterview (RI), when a second FR validates whether the first FR followed procedures in completing the original interview. The Bureau may investigate RIs that yield discrepancies or irregularities to determine whether FRs falsified the original interviews. FRs who falsified interviews may face disciplinary action, such as having their employment suspended or terminated. The Bureau may rework interviews by those FRs if time allows or select their future cases for RI.

The reimbursable surveys we reviewed as part of this audit included the American Housing Survey (AHS), Consumer Expenditure Survey (CE), and Current Population Survey (CPS). For this audit, we focused on reimbursable surveys that have an in-person or telephone data collection component, a high dollar cost, a large sample size, and a high impact on the U.S.

¹ The Bureau conducts reimbursable surveys according to its *Statistical Quality Standards*, whether under 13 U.S.C. § 8(b), 15 U.S.C. §§ 1525 and 1526, or other authorization.

² Four divisions within the Demographic Programs Directorate that carry out surveys include (1) Population; (2) Social, Economic, and Housing Statistics; (3) Demographic Statistical Methods; and (4) Demographic Systems.

³ The Demographic Programs Directorate works with several sponsors including the U.S. Bureau of Labor Statistics, the National Center for Health Statistics, the U.S. Department of Housing and Urban Development, the Bureau of Justice Statistics, the National Center for Education Statistics, the U.S. Fish and Wildlife Service, the Maternal and Child Health Bureau, the Health Resources and Services Administration, and the National Center for Science and Engineering Statistics.

⁴ This includes data about health, housing, education, poverty, immigration patterns, and recreational activities.

economy, and that were carried out by divisions within the Demographic Programs Directorate during FYs 2019–2021.

AHS

The AHS, sponsored⁵ by the U.S. Department of Housing and Urban Development (HUD)⁶ since 1973, provides current and continuous data series on selected housing and demographic characteristics. Policy analysts, program managers, budget analysts, and Congressional staff use AHS data to assess housing needs by monitoring supply, demand, and changes in housing conditions and costs. Analysis based on the AHS advises the executive and legislative branches in the development of housing policies, and HUD relies on the AHS to improve efficiency, effectiveness, and housing program design for different target groups.⁷ Academic researchers and private organizations also use AHS data in efforts of specific interest and concern to their respective communities. The AHS is conducted in odd-numbered years between the months of May and September.

CE

The CE, sponsored⁸ by the U.S. Bureau of Labor Statistics (BLS)⁹ since 1979, provides data on expenditures, income, and demographic characteristics of consumers in the United States. Consumer expenditure data are collected in two surveys: the quarterly Interview Survey (CEQ) and the Diary Survey (CED). In CEQ, FRs conduct initial and repeat interviews within sample units¹⁰ four times during the 12-month survey cycle in the first month of every quarter. CEQ obtains data on large and recurring expenditures that respondents could be expected to accurately recall over a 3-month period or for which records would likely be available. CED asks respondents to keep two 1-week diaries for the selected month and record all consumer unit¹¹ purchases that may be difficult to recall after a few weeks, such as food, meals, personal care products, and gasoline, providing data on items not covered in detail by CEQ. Consumer expenditure data are primarily used to revise the relative importance of goods and services in the market basket of the CPI. The CE is the only federal household survey to provide information on the complete range of consumers' expenditures and incomes. The CE survey is a continuing survey with interviews conducted each month.

⁵ AHS is sponsored under the authority of 12 U.S.C. §§ 1701z-1, 1701z-2(g), and 1701z-10a.

⁶ HUD is responsible for national policy and programs addressing America's housing needs, improving and developing the nation's communities, and enforcing fair housing laws.

⁷ Examples of target groups are first-time home buyers and the elderly.

⁸ CE is sponsored under the authority of 29 U.S.C § 2.

⁹ BLS is a component of the U.S. Department of Labor and is the principal fact-finding agency for the federal government in the broad field of labor economics and statistics. Its primary purpose is to research and provide reports on measures of labor market activity, working conditions, price changes, and productivity in the U.S. economy.

¹⁰ Sampling units are the basic components of a sampling frame, such as defined areas, houses, people, or businesses.

¹¹ A consumer unit is the unit of analysis for each survey. FRs classify household members by consumer unit, using household member relationship and financial independence. Sample units may have one or more consumer units.

CPS

The CPS, sponsored¹² jointly by the Bureau and BLS since 1942, provides estimates of employment, unemployment, and other characteristics of the general labor force, population, and subgroups within the population. In addition to being the primary source of monthly labor force statistics, the CPS collects data for a variety of other studies that keep the nation informed of the economic and social well-being of its people. The Bureau accomplishes this through supplemental questions, some of which are sponsored by other federal agencies, that include a variety of topics such as child support, fertility, disability, veterans, civic engagement, internet usage, and food security.¹³

The CPS is a continuing survey consisting of approximately 70,000 household interviews conducted during a 10-day period each month. FRs interview households a total of eight times over a period of 16 months—4 months on, 8 months off, and 4 months on. Households are considered to be in sample during this 16-month period.

Effects of the COVID-19 pandemic on survey methodology and results

The COVID-19 pandemic forced the Bureau to modify its survey methodology by increasing the number of telephone interviews and using online data collection tools, among other things. The Bureau did not change the 2021 AHS questionnaire, but it developed procedures to train FRs remotely. All field staff followed established field directorate safety protocols during data collection and used phone interviews in lieu of face-to-face interviews. The Bureau modified CE operations with the mailing of advance letters,¹⁴ a telephone-only contact strategy,¹⁵ and an online diary instrument¹⁶ available to FRs and respondents in July of 2020. FRs returned to visiting sample addresses where permissible in July 2020. The Bureau modified CPS operations by adding questions to the survey in April 2020,¹⁷ using a telephone-only contact strategy, placing advance letters on the CPS website, and ceasing operations in contact centers.¹⁸ In September 2020, the Bureau lifted restrictions on personal interviewing and resumed contact center operations.¹⁹

¹² CPS is sponsored under the authority of 13 U.S.C. § 182 and 29 U.S.C. §§ 1-9.

¹³ This audit only assessed the basic CPS and not any of the supplements.

¹⁴ Also known as an introductory letter, this letter describes the survey; announces forthcoming visits; and gives potential respondents information about their rights under the Privacy Act, the voluntary nature of the survey, and the guarantees of confidentiality for the information they provide.

¹⁵ BLS limits CE telephone interview rates because the survey was designed to be conducted in person to yield higher-quality data collection results. When FRs conduct more interviews by telephone, they reduce their engagement with respondents—they cannot explain interview questions, review receipts, or verify calculations to ensure that respondents correctly categorized items.

¹⁶ The Bureau is refining the online diary instrument to make it a permanent part of the survey's methodology.

¹⁷ These new questions focused on telework, earnings for missed work, and job search behavior as a result of the pandemic.

¹⁸ The Bureau operates telephone contact centers in Jeffersonville, Indiana, and Tucson, Arizona, to assist in carrying out household interviews.

¹⁹ While contact center operations resumed, their workload was reduced from 10 percent of the total workload to approximately 5–7 percent.

Beginning in March 2020, the pandemic forced many businesses to temporarily close or reduce their hours to meet local public health mandates. These constraints not only reduced the availability of gainful employment, but also created a degree of uncertainty regarding the employment status for many respondents. The Bureau's CPS question and answer structure caused confusion on whether a respondent was working or not, resulting in the understatement of the monthly unemployment rate starting in March 2020 through at least January 2022 when BLS stopped reporting the difference.

Why We Did This Review

The results of CPS, CE and AHS surveys are widely watched federal economic indicators that governments and the private sector rely upon, and data collection for these surveys must meet the highest standards for accuracy and reliability. However, data collection issues have been confirmed in the past²⁰ while the risk remained that a lack of quality control measures could result in the publication of erroneous data. As we have already noted, the Bureau and BLS recognized an issue involving the misclassification of workers' employment status that likely contributed to the underreporting of monthly unemployment rates in 2020. Issues such as these indicated a growing need for us to determine whether there were systematic problems involving the data quality of reimbursable surveys. Unreliable data would significantly impact decision making and could cause stakeholders to lose confidence in the Bureau's ability to provide quality data.

²⁰ See findings in the following investigative report: U.S. Department of Commerce Office of Inspector General, May 1, 2014. *Unsubstantiated Allegations that the Philadelphia Regional Office Manipulated the Unemployment Survey Leading up to the 2012 Presidential Election to Cause a Decrease in the Unemployment Rate*, I4-0073. Washington, DC: DOC OIG.

Objective, Findings, and Recommendations

The objective of our audit was to determine whether reimbursable surveys conducted by the Bureau's Demographic Programs Directorate provide quality and reliable data to help sponsoring federal agencies make informed decisions. Specifically, we (1) determined whether the Demographic Programs Directorate divisions met or exceeded quality metrics for the reimbursable surveys they carry out; (2) determined whether the Bureau's quality assurance processes for survey data collection, processing, and reporting were working as intended; and (3) assessed the impact on survey sponsors of data whose established performance metrics or quality assurance processes were not met or carried out. See appendix A for additional details regarding the scope and methodology of our audit.

We reviewed three reimbursable survey programs: AHS, CE (to include the CED and CEQ surveys), and CPS for FYs 2019, 2020, and 2021. We found that generally the Bureau provided reliable data. However, while the Bureau has established controls along with performance and quality metrics to ensure the quality of survey data, it does not consistently follow or achieve these metrics. Specifically, we found that

- I. The Bureau needs to improve performance management processes for reimbursable surveys.
 - A. The Bureau did not meet data collection targets and faces declining response rates.
 - B. The Bureau did not meet performance measurement goals for diary placement and telephone interview rates.
- II. The Bureau needs to improve its quality assurance program for reimbursable surveys.
 - A. The Bureau did not meet RI completion goals and RIs were not completed timely.
 - B. The Bureau did not investigate cases with discrepancies for falsification.
 - C. The Bureau did not adequately document or timely complete falsification investigations.
 - D. The Bureau did not rework CPS cases completed by FRs with confirmed falsifications.
- III. Regional offices did not relieve FRs from survey data collection during falsification investigations and systematically track confirmed falsifications for use in future hiring decisions.

These inconsistencies increase the risk that a sponsor could receive data that does not reflect the target population intended for the survey. In addition, it is vital for the Bureau to incorporate new methodologies and technology into its data collection process to ensure it meets expected response rates and reduces respondents' burden.²¹ The Bureau, BLS, and HUD recognized the issue of declining survey response rates for their surveys, and research has

²¹ Respondent burden is the estimated total time and financial resources the respondent expends to generate, maintain, retain, and provide census or survey information.

shown this issue has impacted household surveys across the federal government.²² A continued decline in response rates could increase data collection costs, affect data quality, increase uncertainty of reported estimates, and result in the sponsor reporting unreliable information.

I. The Bureau Needs to Improve Performance Management Processes for Reimbursable Surveys

We found that the Bureau did not meet target response rates²³ for AHS, CED, CEQ, and CPS. Additionally, for the CE, the Bureau conducted more telephone interviews than the sponsor-prescribed limits and did not place 2-week diaries with consumer units in a timely manner. According to sponsor officials, CEQ is designed to be an in-person interview, so exceeding telephone interview rate limits can result in lower-quality data. Failure to place diaries within the first month of data collection results in a sample unit being deemed a noninterview, which further compounds the challenges faced in a climate of declining response rates. When the Bureau does not meet target response rates, sponsors must conduct nonresponse bias analysis and implement other established controls to ensure that the Bureau's results are accurate, precise, and unbiased.

A. The Bureau did not meet data collection targets and faces declining response rates

We found the Bureau did not meet the target response rates for all three surveys we reviewed for FYs 2019–2021.²⁴ The Office of Management and Budget's (OMB's) *Standards and Guidelines for Statistical Surveys* and the Bureau's *Statistical Quality Standards* both require a nonresponse bias²⁵ analysis when response rates are below 80 percent. The AHS response rates were below the target goal of 83 percent in 2019 and 2021, with respective response rates of 74.3 percent and 68.8 percent. For CPS, the Bureau did not meet the target response rate of 80 percent for 7 of 12 months in FY 2020 and for 11 of 12 months in FY 2021 (see appendix B).

²² Czajka, J. and Beyler, A., June 15, 2016. *Declining Response Rates in Federal Surveys: Trends and Implications*. Washington, DC: Mathematica Policy Research. Available online at www.mathematica.org/publications/declining-response-rates-in-federal-surveys-trends-and-implications-background-paper (accessed March 10, 2023).

²³ Target response rates comprise the number of sample units that respond to a survey divided by the total number of eligible sample units.

²⁴ According to Bureau officials, target response rates are set at the national level, with a goal of 83 percent for AHS and 80 percent for CPS and CE.

²⁵ U.S. Census Bureau, November 30, 2021. *An Overview of Addressing Nonresponse Bias in the American Community Survey During the COVID-19 Pandemic Using Administrative Data* [online]. <https://www.census.gov/newsroom/blogs/random-samplings/2021/11/nonresponse-acs-covid-administrative-data.html> (accessed February 6, 2023). "While survey weighting has multiple goals, one important goal is correcting for *nonresponse bias*. Nonresponse bias can occur when the people who complete the survey (respondents) differ from people who do not complete the survey (nonrespondents). Weighting can mitigate the effects of nonresponse bias. For example, the Bureau's household surveys adjust their weights to have age and race statistics match the estimates from the Bureau's population estimates. If older individuals are more likely to respond to a survey than younger individuals, for example, then this weighting adjustment will mitigate nonresponse bias with respect to age."

The response rates for both the CED and CEQ surveys were below 80 percent in all months throughout FYs 2019–2021. While Bureau officials indicated in May 2022 that the target response rate for CE was 80 percent, they later clarified that it was OMB that required surveys with less than an 80 percent response rate to conduct a nonresponse bias analysis. According to Bureau officials, they did not have the expectation of meeting an 80 percent response rate and their objective was to maintain a steady level of response. Based on our review of the response rates for both CED and CEQ, we saw a continued decline in the average response rates over FYs 2019–2021; the CED survey response rates ranged from 28.3 percent to 59.8 percent and the CEQ survey response rates ranged from 40.3 percent to 57.6 percent (see appendix B).

Bureau officials cited respondent burden, difficulty meeting hiring goals for FRs, and employee attrition as contributing to the lower CE response rates. BLS officials explained that a good-quality interview will last 2 to 3 hours—a substantial time commitment for respondents—and involves questions that would be extraordinarily difficult for another household respondent to answer. Further compounding this issue, the pandemic limited the number of in-person visits during FYs 2020 and 2021. Concurrently, FR vacancies and rising costs both contributed to the Bureau not meeting target response rate goals. Specifically for AHS, Bureau officials described difficulty with meeting FR hiring goals and a high number of resignations, resulting in increased time spent training replacement hires.²⁶ While the Bureau implemented workarounds²⁷ in response to COVID-19 restrictions, it still faced difficulties collecting survey responses because it could not access respondents or deploy FRs to a respondent’s home for in-person visits. The Bureau’s inability to meet target response rates placed an additional burden on the survey sponsors, who must perform nonresponse bias analysis for surveys with response rates under 80 percent. Lower response rates can result in less precision for the estimates that are produced.

We verified that AHS, CE, and CPS survey sponsors conducted, or contracted for, the required nonresponse bias analysis when the response rate fell below 83 percent for AHS and 80 percent for CE and CPS.²⁸ For AHS, HUD contracted with the U.S. General Services Administration (GSA) and the Bureau to conduct the nonresponse bias analysis

²⁶ In 2019, the AHS needed 2,900 FRs but was only able to hire 2,300 FRs—about 79 percent of the need. However, 450 FRs resigned by the end of data collection, resulting in 11 percent of training hours being used to train replacements. In 2021, the AHS needed and was able to hire 2,500 FRs, about 100 percent of the need. However, 500 FRs resigned between training and peak data collection and 800 FRs resigned by the end of data collection, resulting in 17 percent of total training hours being used to train replacements. Disclosure avoidance techniques used to protect respondent confidentiality have been applied to these data per Bureau guidance.

²⁷ Some of the survey adaptations the Bureau made in response to COVID-19 included telephone-only contact strategies, training FRs to work remotely, and sending advance letters that described the survey and provided respondents with information about upcoming visits and their rights. Additionally, the CE deployed an online diary instrument and the CPS added questions in April 2020 that focused on telework, earnings missed, and changes in job search behavior.

²⁸ The nonresponse bias analysis for CE for 2019 and 2020 concluded that relative bias was minor and insignificant. The CPS survey sponsor conducted nonresponse bias analysis in FYs 2020 and 2021 and found no clear, persistent bias effect. Some impacts were detected at the onset of the COVID-19 pandemic, but they were not considered significant.

for the 2019 and 2021 surveys, respectively. GSA is expected to complete the 2019 survey nonresponse bias analysis in September 2023,²⁹ while Bureau officials stated the 2021 nonresponse bias analysis will be completed no later than October 2023. According to Bureau officials, its *Statistical Quality Standards* do not specify a timeline to release nonresponse bias analysis and place that responsibility on the sponsor. However, we noted that these standards are not reevaluated on a recurring basis. The version applicable to the scope of our review was issued in July 2013, with updates issued almost a decade later in April 2022 and February 2023.

Survey response rates are valuable data quality and field performance indicators. Higher response rates increase the likelihood that raw survey results reflect the views and characteristics of the target population.³⁰ If the Bureau does not take action to increase response rates, the requirement to apply additional statistical measures to survey data, such as weighting, will place an increased burden on the Bureau or sponsor.³¹

Recommendations

We recommend that the Director of the U.S. Census Bureau

1. Evaluate alternative strategies to achieve target response rates, particularly in underrepresented units.
2. Establish internal response rate targets to ensure CE estimates are accurate and precise.
3. Periodically review statistical measures for managing nonresponse to ensure the measures are updated and appropriately communicated to stakeholders in a timely manner.

²⁹ GSA's September 2020 draft report on the 2015, 2017 and 2019 AHS nonresponse bias analyses noted strong evidence of nonresponse bias where characteristics of responding and nonresponding units were different to an extent that cannot be explained by chance. The report found that the weighting methodology used by the Bureau helps correct the nonresponse bias but does not completely mitigate the problem. The report recommended that the AHS could be strengthened with efforts designed to increase the representativeness of responding units. See U.S. General Services Administration, September 2020. *Nonresponse Bias in the American Housing Survey 2015-2019*. Washington, DC: GSA, pg. 43. Available online at www.omb.report/icr/202012-2528-004/doc/107079300.pdf (accessed March 16, 2023).

³⁰ Collected survey data may still be representative of the target population despite low response rates if nonresponse is completely random.

³¹ Weighting involves using values associated with each sample unit that are intended to account for probabilities of selection for each unit and other errors, such as nonresponse, so that estimates using the weights represent the entire population. See Census Bureau, July 2013. *U.S. Census Bureau Statistical Quality Standards*. Suitland, MD, Census Bureau, pg. 174. Available online at https://www.census.gov/content/dam/Census/about/about-the-bureau/policies_and_notices/quality/statistical-quality-standards/Quality_Standards.pdf (accessed January 10, 2022). For CPS and CE, the responsibility for weighting is on the sponsor, while for AHS the responsibility is borne by the Bureau.

B. The Bureau did not meet performance measurement goals for diary placement and telephone interview rates

During our review, we found that the Bureau did not meet quality measures for the CED survey and performance metrics for the CEQ survey during FYs 2019–2021. The CEs have metrics in place, established through interagency agreements and Bureau policies, to help ensure quality survey performance and data collection. However, we found that the Bureau did not meet the established metrics. Specifically, the Bureau did not place 2-week diaries³² for the CED survey with consumer units in a timely manner, which hindered respondents' ability to record their responses, and the Bureau exceeded the maximum rates established for conducting telephone interviews for the CEQ survey. By not meeting the quality measures and performance metrics established for the CED and CEQ surveys, the Bureau risks collecting and reporting inaccurate data or high numbers of noninterviews. This may decrease the responses available and ultimately affect the data reported to BLS.

The Bureau did not place two-week diaries with households in a timely manner

We found that the Bureau placed diaries too late³³ during FYs 2019–2021, with the number of diaries placed too late increasing each year during this period. Diaries placed too late accounted for 4 percent of all interview outcomes in FY 2019 and 5 percent of all interview outcomes in FYs 2020 and 2021.³⁴ The Bureau considers a diary placed with a household after an FR conducts the initial interview with the respondent to drop off the diary, explain how to complete it, and provide a pickup date. The Bureau stated that respondents often defer or reschedule the initial interview, resulting in diaries being placed too late. Timely diary placement is important to help ensure a representative sample of U.S. household purchases is included in the CPI. When FRs do not place diaries within the first month of data collection, the household is classified as a Type A³⁵ noninterview and is not included in the data sent to the sponsor. This decreases the responses for the survey cycle and further compounds the problem the Bureau faces with declining response rates.

The Bureau exceeded the maximum limits for conducting telephone interviews for the CEQ survey

A telephone interview, for the purposes of the CEQ survey, is an interview in which FRs complete at least half of the survey sections by telephone. Generally, FRs conduct

³² Respondents use diaries for recording small purchases made by a household, such as food, meals, personal care products, and gasoline.

³³ Diary placement—the initial interview and diary dropoff—begins the process of data collection for the CED survey. The Bureau must place diaries with households within the first month of data collection; diaries placed too late are those placed later than that first month.

³⁴ Two-week diaries placed too late in FYs 2019, 2020, and 2021 were at a rate of 4 percent (450 of 12,500), 5 percent (750 of 16,500), and 5 percent (900 of 18,000), respectively.

³⁵ Type A noninterview is an outcome for households that are eligible for interview but where FRs could not obtain a response.

telephone interviews when they cannot obtain in-person interviews. Although BLS, the survey sponsor, designed the CEQ survey to be conducted in person, the Bureau consistently exceeded the telephone interview rates established in the interagency agreement between BLS and the Bureau. BLS stated that CEQ surveys yield higher-quality data when conducted in person because respondents tend to be more focused during in-person interviews, and the FRs can review receipts and information to validate the accuracy of respondent information. Table I outlines the telephone interview rate limits and the average telephone interview rate per year for each of the four interview periods during FYs 2019–2021.

Table I. CEQ Telephone Interview Rate Limits and Average Rates by Percentage for Interview Periods in FYs 2019–2021^a

Interview/Quarter Number ^b	2019 Limit (Average Rate of Actual Telephone Interviews)	2020 Limit (Average Rate of Actual Telephone Interviews)	2021 Limit (Average Rate of Actual Telephone Interviews) ^c
1	16 (22)	24 (61)	24 (64)
2	31 (38)	48 (69)	48 (77)
3	36 (41)	48 (71)	48 (79)
4	36 (41)	48 (71)	48 (81)

Source: Office of Inspector General (OIG) analysis of CEQ performance and quality metrics for FYs 2019-2021

- ^a Figures provided in parentheses reflect the average telephone interview rate on an annual basis.
- ^b Households are selected to be interviewed 4 times during the duration of a CEQ survey cycle over the span of 10 months. FRs conduct visits once every three months during this time (in months, 1, 4, 7, and 10).
- ^c The FY 2021 interagency agreement included a statement that the Bureau should adhere to the telephone interview rates as feasible depending on restrictions for in-person visits as a result of the COVID-19 pandemic.

The Bureau exceeded the telephone interview rate in each month of quarter 1 except in October and December of FY 2020. We also saw that the Bureau exceeded the telephone interview rate in each month of quarters 2, 3, and 4 except in October–February of FY 2020. Bureau officials acknowledged that during FYs 2020 and 2021, fewer people were willing to respond to the survey in person because of the COVID-19 pandemic but could not explain why they exceeded the rate in FY 2019. Because field operations have returned to normal, the exception to the maximum interview rate outlined in the interagency agreement may not apply in future years.

Because the Bureau exceeded the maximum telephone interview rates in most periods, the quality of the data obtained may be affected. This may decrease the accuracy of the CEQ data the Bureau provides to BLS.

Recommendations

We recommend that the Director of the U.S. Census Bureau

4. Develop strategies to address respondent refusal in the next CED survey redesign.
5. Ensure that regional offices adhere to prescribed telephone interview rates or work with BLS to adjust them as needed.

II. The Bureau Needs to Improve Its Quality Assurance Program for Reimbursable Surveys

To reduce the risk of data falsification, the Bureau has established a quality assurance program consisting of RIs and falsification investigations. However, the Bureau did not meet quality assurance program requirements for the AHS, CED, CEQ, and CPS during FYs 2019–2021. Specifically, the Bureau did not meet RI³⁶ measures, adequately document falsification investigations, or complete those investigations in a timely manner. We found that each survey had cases with discrepancies that the Bureau did not investigate, and the Bureau did not rework some CPS cases completed by FRs with confirmed falsifications. By not meeting quality assurance measures, the Bureau cannot guarantee that it detected, reviewed, and resolved cases with discrepancies or that FRs with confirmed falsifications did not falsify additional cases. This may result in the Bureau providing inaccurate data to sponsors.

A. *The Bureau did not meet RI completion goals and RIs were not completed timely*

Although the Bureau conducts RIs as part of the quality control program to detect and deter FRs who may be falsifying data, the Bureau did not meet RI completion rates³⁷ for all four surveys. In addition, the Bureau did not complete RIs within 14 days for AHS, CED, and CEQ. RIs are a critical part of the Bureau's quality control process to validate whether FRs conducted interviews properly and obtained complete and accurate results.

The Bureau completed fewer RIs than planned

The Bureau's RI sampling objective was to select 10 percent of interview cases for random RI for AHS and CEQ, 15 percent for CED, and 3 percent for CPS. While the Bureau met the selection goal for each survey, not all cases selected for random RI were eligible,³⁸ meaning that the Bureau reviewed a smaller sample of cases. For

³⁶ An RI is a second interview the Bureau uses to determine whether the original interviewer followed procedures during the first interview. The primary purpose of an RI is to detect interviewers who intentionally (1) falsified interview responses or misclassified occupied units as noninterviews and (2) did not follow proper interview procedures, such as using a laptop for personal visits or collecting the household roster.

³⁷ RI completion rate is the number of completed RIs divided by the number of eligible cases in RI.

³⁸ Examples of issues that render cases ineligible include language problems, the respondent not being home or temporarily absent, and respondent refusal.

example, the FY 2021 actual RI rates for AHS, CEQ, CED, and CPS were 6 percent, 5 percent, 6 percent, and 2 percent of total cases, respectively. To achieve internal quality standards, the Bureau requires that 80 percent of cases selected and eligible for random RI must complete the RI process; however, the Bureau did not always meet that rate for any of the four surveys during FYs 2019–2021. Table 2 shows the breakdown of random RI completion rates by survey.

Table 2. Random RI Completion Rate by Survey for FYs 2019–2021^a

Survey	2019 (Percent)	2020 (Percent)	2021 (Percent)
AHS^b			
Total Cases	116,000	N/A	126,000
Cases Selected for RI	12,500 (10.8)	N/A	13,000 (10.3)
Cases Eligible for RI	9,000 (7.8)	N/A	9,100 (7.2)
Completed RIs	6,900 (76.7)	N/A	7,200 (79.1)
CED			
Total Cases	12,000	18,000	16,500
Cases Selected for RI	1,900 (15.8)	2,700 (15.0)	2,500 (15.2)
Cases Eligible for RI	1,200 (10.0)	1,300 (7.2)	1,100 (6.7)
Completed RIs	1,000 (83.3)	1,000 (76.9)	1,000 (90.9)
CEQ			
Total Cases	37,500	41,000	42,000
Cases Selected for RI	5,200 (13.9)	5,100 (12.4)	5,100 (12.1)
Cases Eligible for RI	3,100 (8.3)	3,100 (7.6)	2,600 (6.2)
Completed RIs	2,600 (83.9)	2,400 (77.4)	2,200 (84.6)
CPS^c			
Total Cases	N/A	805,000	818,000
Cases Selected for RI	N/A	25,500 (3.2)	24,500 (3.0)
Cases Eligible for RI	N/A	21,000 (2.6)	18,500 (2.3)
Completed RIs	N/A	16,500 (78.6)	15,500 (83.8)

Source: Bureau survey data

^a Disclosure avoidance techniques used to protect respondent confidentiality have been applied to these data per Bureau guidance.

^b The AHS is conducted in odd-numbered years.

^c During the scope of our audit, two 15-month RI cycles were carried out and completed for the CPS—one from January 2019 to March 2020 and another from April 2020 to June 2021.

Bureau officials indicated that they did not meet the target rate for AHS because they did not have sufficient staff to complete RIs. They also noted challenges with completing random RIs for CED and CEQ during FY 2020 because of the COVID-19 pandemic. Bureau officials told us FRs completed RIs largely by telephone because they could not conduct follow-up visits in person and there was an increased reluctance to respond due to the pandemic.

Additionally, Bureau officials explained that for CPS, it was more difficult to meet the random RI completion rate in some months than others depending on the day of the week the RI closed.³⁹ According to Bureau officials, other contributing factors included staffing challenges at regional offices and efforts to lower operational costs by reducing contact attempts and personal visits.

Not reaching the RI completion rate means that the Bureau will not review some cases selected for RI, resulting in the possibility that problem cases or potential falsifications go undetected. If the Bureau does not address these problems, it risks providing incorrect data to sponsors and failing to identify FRs who need to be removed or retrained.

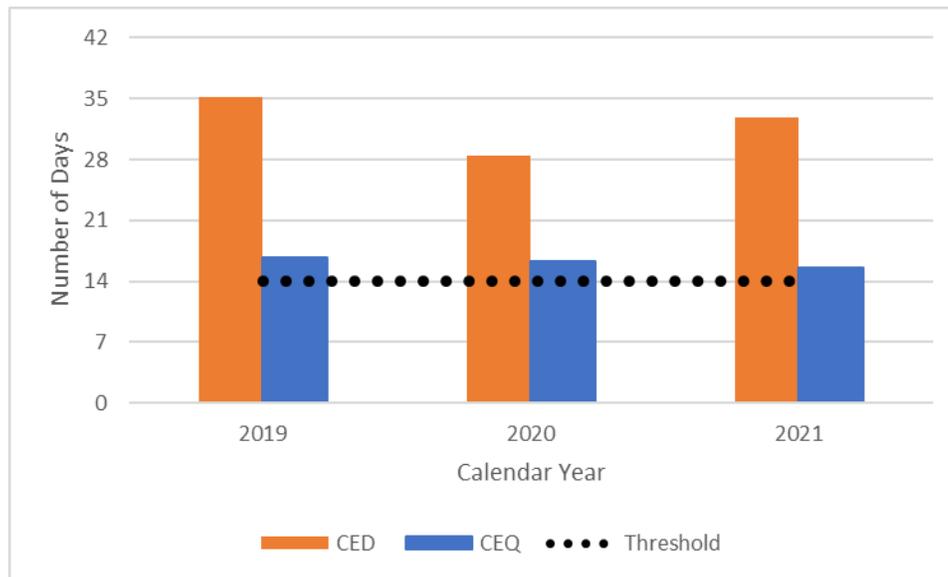
The Bureau did not complete RIs in a timely manner

It is important to conduct RIs within 14 days because the longer the delay between the original interview and the RI, the higher the risk for nonsampling errors. This is because recall error increases and purchase habits or household changes may not be accurately captured, which impact the quality of data collected. We found that while CPS achieved the goal of conducting RIs within 14 days, the Bureau did not complete RIs on time for the AHS, CED, and CEQ surveys. In FY 2019 and FY 2021, the average RI lag time⁴⁰ for AHS was approximately 47 and 43 total days, respectively. The Bureau did not meet its goal of completing RIs within 14 days in any month for the CED survey and exceeded that goal by at least 2 weeks for each calendar year (CY) in 2019–2021. We saw the Bureau meet its goal of completing RIs within 14 days in only 6 of 36 months⁴¹ for the CEQ survey during CYs 2019–2021. The average RI lag time for CED and CEQ surveys was about 32 and 16 total days, respectively, in CYs 2019–2021 (see figure 1).

³⁹ Bureau officials noted that in FY 2019, moving the RI closing date from Tuesday to Wednesday increased the response rate.

⁴⁰ RI lag time is the number of days between original interview completion and RI completion.

⁴¹ The 14-day goal was met in January of CY 2019 (14 days), February of CY 2019 (14 days), September of CY 2020 (13 days), February of CY 2021 (14 days), May of CY 2021 (13 days), and November of CY 2021 (14 days).

Figure I. Average CED and CEQ RI Lag Times in CYs 2019-2021

Source: OIG analysis of CED performance and quality metrics for CYs 2019–2021

The long RI lag time occurred for AHS because the Bureau did not have enough staff to complete the RIs. For the CED survey, the long RI lag time occurred because the Bureau did not account for the 2 weeks between the original interview and when the final diaries are collected. The Bureau was starting the lag time measurement when the original interview was conducted instead of starting it after diary collection. Therefore, it was impossible to complete an RI within the 14-day goal. Bureau officials acknowledged the unreasonableness of the metric.

For the CEQ survey, regional offices and telephone centers manage their RI completions based on predetermined closeout dates assigned to each interview period. The Automated Reinterview System⁴² does not facilitate daily tracking of RI lag time for each case, as RI lag time is calculated using the number of days from the original interview to the completion date of the RI. The Bureau's main focus is completing RIs by the closeout date.

Long RI lag time can (1) delay the Bureau's discovery of falsifications and its opportunity to rework cases; (2) postpone corrective actions for FRs with discrepancies, impacting the cases they were working on before the issues were identified; and (3) lead to understated RI results for sponsors.

⁴² This system selects and assigns RI cases for quality control and/or response error RIs within 24 hours of the original interview and processes the results to assist in making decisions and analyzing data in a timely manner.

Recommendations

We recommend that the Director of the U.S. Census Bureau

6. Ensure all surveys and regional offices maximize the use of data analysis and monitoring tools to oversee survey quality and performance.
7. Ensure RI requirements are met and completed in a timely manner.
8. Reevaluate the effectiveness of the CED survey RI lag time metric.

B. The Bureau did not investigate cases with discrepancies for falsification

During RI, the RI instrument checks for specific discrepancies, which are the differences between (1) the original interview and RI and (2) the original interview and the survey protocol/guidelines. Discrepancies are the primary indicator the Bureau uses to identify potential concerns in the original data collection as part of its quality control process. Certain RI answers by the respondent signify a discrepancy that will automatically flag a case for investigation:

- 1 – household not contacted per RI respondent,
- 5 – classified interview Type A unit as Type B/C,⁴³ and
- 10 – FR did not use laptop.

The term for these discrepancy cases is data irregularity, which signifies suspected data falsification or failure to follow procedures. Except for data irregularities (e.g., an FR does not use a laptop to complete an original interview), discrepancies are typically minor. See appendix D for the list of possible case discrepancy codes.

During FYs 2019–2021, the Bureau did not have assurance that cases with discrepancies not automatically investigated were properly resolved or corrected, which can impact the quality of the data collected. We found that 58.6 percent of AHS' discrepancies, 65 percent of CED's, 82 percent of CEQ's, and 50 percent of CPS' were not sent for investigation (see appendix D for details).

The Bureau requires that all cases not completed, marked as discrepancy, or marked as data irregularity undergo supervisory review. The Bureau automatically classifies all discrepancies coded 1, 5, or 10 as suspected falsification that requires further investigation, but it does not have a policy for determining whether to investigate all other discrepancy codes. The Regional Survey Manager reviews these cases and decides whether there is a need for further investigation. If the manager determines that an investigation is needed, the manager documents that decision in the Bureau's Survey Field Investigation Tool (sFIT). If the manager determines that an investigation is not needed, there is no documentation. We noted that the Bureau did not investigate a

⁴³ Type B noninterview is an outcome for units that are unoccupied or occupied solely by persons who are not eligible for interview. Examples include units that are vacant, under construction, or occupied by persons with a usual residence elsewhere. Type C noninterview is an outcome for units that are permanently ineligible for sample, such as demolished or condemned units.

majority of the discrepancies that are not automatically referred for further investigation (see appendix D).

Because there are no established procedures for resolving discrepancies given a multitude of potential scenarios, discretion allowed for inconsistent handling of some discrepancies. This resulted in a relatively small portion of discrepancies being investigated further, raising concerns about whether there were additional falsifications or procedural failures the Bureau did not investigate. When the Bureau does not investigate discrepancies, it has no assurance that its data is complete or accurate and may allow FRs with performance issues to continue negatively impacting data quality.

Recommendation

We recommend that the Director of the U.S. Census Bureau

9. Establish a policy and criteria for discrepancy adjudication to determine when cases should be referred for investigation.

C. *The Bureau did not adequately document or timely complete falsification investigations*

Falsification investigations are a critical component of the Bureau's efforts to ensure sponsors receive accurate data from households. However, our review of investigations determined that the Bureau did not adequately document actions it took during an investigation and did not complete investigations in a timely manner. For example, actions taken by the investigator, such as issuing a 5-day letter⁴⁴ or reviewing an RI trace file and RI case notes, had no supporting information attached to justify them. This could indicate that investigations did not identify when FRs falsified interviews and that FRs who were falsifying interviews continued to work undetected. As a result, the number of interview falsifications could be higher than reported, which would adversely impact the quality of data provided to sponsors.

To carry out our assessment, we obtained data on all falsification investigations performed for the four surveys for FYs 2019–2021: 650 for the AHS, 150 for the CED, 250 for the CEQ, and 2,300 for the CPS.⁴⁵ We then selected samples of investigations for each survey. With access to sFIT, we reviewed the record for each investigation and all supporting documents⁴⁶ to determine whether the Bureau adequately documented each investigation and completed it within 60 days. We found problems with adequate documentation and timely completion of investigations for all four surveys (see table 3).

⁴⁴ A 5-day letter is a letter from Bureau management to an FR requesting an explanation within 5 working days for a data discrepancy involving an original case that was detected during RI.

⁴⁵ Disclosure avoidance techniques used to protect respondent confidentiality have been applied to these data per Bureau guidance.

⁴⁶ We looked at data entered into the sFIT record, FR notes, RI notes, trace files for the interview, letters to the FR outlining the irregularity(-ies), and the FR's response to the investigation's findings.

Table 3. Documentation and Timeliness of Falsification Investigation Samples in FYs 2019-2021⁴⁷

Survey	Sample Size	Inadequate Documentation (Percent)	Completed After 60 Calendar Days (Percent)
AHS ^a	61	33 (54)	9 (15)
CED ^b	48	15 (31)	7 (15)
CEQ ^c	54	24 (44)	7 (13)
CPS ^d	66	8 (12)	8 (12)

Source: OIG analysis of Bureau survey data

- ^a We are 90 percent confident that 54.6 percent (+/- 8.8 percentage points) of AHS investigations were not adequately documented and 14.5 percent (+/- 6.6 percentage points) were not completed in a timely manner.
- ^b We are 90 percent confident that 32.1 percent (+/- 7.0 percentage points) of CED investigations were not adequately documented and 14.5 percent (+/- 7.0 percentage points) were not completed in a timely manner.
- ^c We are 90 percent confident that 44.6 percent (+/- 8.2 percentage points) of CEQ investigations were not adequately documented and 11.2 percent (+/- 6.4 percentage points) were not completed in a timely manner.
- ^d We are 90 percent confident that 12.4 percent (+/- 5.9 percentage points) of CPS investigations were not adequately documented and 12.1 percent (+/- 6.6 percentage points) were not completed in a timely manner.

The Bureau attributed these deficiencies to inadequate training and guidance on how to complete investigations, which led to inconsistencies that the Bureau did not detect—despite each case undergoing two levels of approval—and insufficient staff available to complete the investigations on time. The Bureau acknowledged that it should have recorded better investigation notes to explain data irregularities, follow-up with FRs was lacking or inadequate, some investigation records were missing required documents, and some records contained contradictory data. Additionally, for the CED and CEQ, the Bureau did not properly tailor its RI questions to account for specific survey requirements, which resulted in an increased time burden from some cases being unnecessarily sent for investigation.

Falsification investigations are critical because they identify whether original interviews were falsified. If time permits, the Bureau reworks the total workload of FRs who have falsified an interview to ensure the sponsor does not receive falsified data. For the AHS and CE, if the Bureau cannot rework an FR's workload, it removes the FR's original interviews from the data that is provided to the survey sponsor and treats them as nonresponses. For the CPS, it is not possible to rework or remove cases from the results because of the short data collection period. The Bureau can take remedial action

⁴⁷ We statistically selected samples of falsification investigations for each survey using a confidence level of 90 percent, a precision level of + or – 10 percent, and an expected error rate of 10 percent to determine the sample size. This enabled us to generate estimates that projected the sample results across the entire population or universe of falsification investigations for each survey.

against FRs who are found to have falsified original interviews based on the investigation's outcome. Such FRs could have additional cases selected for RI or be removed from service, thereby preventing future falsifications. By not adequately documenting falsification investigations and completing them on time, the Bureau does not have assurance that cases with discrepancies were properly resolved, which could impact the quality of the data collected.

Recommendations

We recommend that the Director of the U.S. Census Bureau

10. Ensure that falsification investigation requirements are met and completed in a timely manner.
11. Issue a formal policy explaining the falsification investigation process and specifying the documentation required to support the investigation's findings and outcome.
12. Ensure that staff are trained on completing adequate falsification investigations.

D. The Bureau did not rework CPS cases completed by FRs with confirmed falsifications

In FYs 2019–2021, FRs completed nearly 2.4 million original CPS cases nationwide.⁴⁸ We found that 27 FRs had 39 confirmed falsifications during that period. Of that number of FRs, 24 completed tens of thousands of original cases affecting a smaller subset of addresses throughout the Bureau's six regions (the other three did not work any original cases in FYs 2019–2021). Our analysis found that a large majority of the original cases and addresses were in the Los Angeles and New York regions (see table 4).⁴⁹ The Bureau's practice is to rework cases of FRs with confirmed falsifications if time permits before it delivers the data to the sponsor. However, we found that the Bureau did not rework any of the more than 21,000 original cases completed by the 24 FRs with confirmed falsifications. On average, each FR completed 900 cases, with the number of cases per FR ranging from a low of 40 cases to a high of 2,400.⁵⁰

⁴⁸ The word "case" is used interchangeably with "household interview." Specialists completed approximately 125,000 additional cases at the Bureau's two telephone contact centers in Jeffersonville, Indiana, and Tucson, Arizona.

⁴⁹ The Los Angeles region covers the states of Alaska, California, Hawaii, Idaho, Nevada, Oregon, and Washington. The New York region covers the states of Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont, and the territory of Puerto Rico.

⁵⁰ Disclosure avoidance techniques used to protect respondent confidentiality have been applied to these data per Bureau guidance.

Table 4. Cases and Associated Addresses Worked by CPS FRs with Confirmed Falsifications in FYs 2019–2021^a

Census Region	Original Cases (Percent)	Addresses (Percent)
Los Angeles	6,800 (32)	1,900 (30)
Denver	2,300 (11)	550 (9)
Chicago	150 (1)	60 (1)
Atlanta	2,500 (12)	600 (10)
Philadelphia	3,400 (16)	1,000 (16)
New York	6,100 (28)	2,100 (33)
Totals	21,500 (100)	6,300 (100)

Source: Bureau CPS workload data, FYs 2019–2021

^a Disclosure avoidance techniques used to protect respondent confidentiality have been applied to these data per Bureau guidance. Totals and percentages may not sum due to rounding.

Reworking of cases involves having a different FR reconduct past interviews performed by the FR with a confirmed falsification and, potentially, replacing the original interview data with the reworked interview data. However, because of the relatively short monthly CPS data collection window (10 calendar days), there is little to no time to complete RIs—let alone the investigations that would uncover falsifications.⁵¹ The Bureau cannot identify cases for rework until it confirms a falsification. Therefore, the Bureau does not rework CPS cases completed by FRs with confirmed falsifications before the sponsor receives the data. By not reworking cases completed by FRs who falsified cases, the Bureau may have failed to detect other falsified interviews. Any falsified interviews that go undetected remain in the data the Bureau provides to the sponsor for use in generating monthly employment statistics.

Recommendation

We recommend that the Director of the U.S. Census Bureau

13. Strengthen the quality control plan for the CPS by evaluating cases worked by FRs with confirmed falsifications to assess the impact on survey estimates.

⁵¹ The Bureau aims to complete RIs within 14 days after the original interview and falsification investigations within 60 days after the RI.

III. Regional Offices Did Not Relieve FRs From Survey Data Collection During Falsification Investigations and Systematically Track Confirmed Falsifications for Use in Future Hiring Decisions

The Bureau is responsible for ensuring the data FRs collect are accurate and complete. In response to our May 2014 investigative report,⁵² the Bureau implemented corrective actions related to the suspension and removal of FRs who falsify data on surveys. In *Regional Office Administrative Memorandum No. 2018-36*, issued May 16, 2018,⁵³ the Bureau stated that when there are irregularities in the data collected by FRs, regional offices must work quickly and take appropriate action to determine whether the data irregularities resulted from employee misconduct. If, after a preliminary investigation, the Bureau does not clear the employee of misconduct, the memorandum states that the Bureau should immediately relieve the employee of all survey work. If the regional office confirms employee misconduct, the memorandum states regional office management must send a memorandum to the Office of Chief Counsel detailing proposed actions, such as removal. Further, the regional office should immediately begin working with the Employee Relations Branch on this proposal.

For both the AHS and CPS, there were 27 FRs per survey with at least one confirmed falsification from 2019 to 2021. As we noted in our 2014 investigative report, the Bureau allowed FRs it suspected of falsifying data to keep working while their surveys were being examined. In this audit, we found that the Bureau relieved 2 of 27 AHS FRs and 19 of 27 CPS FRs from survey data collection after it suspected them of conduct issues.

We are concerned that FRs with confirmed falsifications may be rehired and pose a risk to data quality in the future. We found that the Bureau removed only 2 of 27 FRs for AHS and 7 of 27 FRs for CPS from service after it confirmed falsifications. We also found that 3 FRs from the AHS and 10 FRs from the CPS remained active and continued to work on the AHS, CPS, and Survey of New Construction (see table 5).

Table 5. Disposition of Employees with Confirmed Falsifications for AHS and CPS

Disposition	AHS	Percentage of Total	CPS	Percentage of Total
Removed	2	7.4%	7	25.9%
Active	3	11.1%	10	37.1%
Resigned	4	14.8%	7	25.9%
Retired	0	0.0%	2	7.4%
Appointment Expired ^a	15	55.6%	0	0.0%

⁵² 14-0073.

⁵³ We did not review the compliance of *Regional Office Administrative Memorandum No. 2018-36* with applicable laws as it was outside the scope of this audit.

Disposition	AHS	Percentage of Total	CPS	Percentage of Total
Lack of Work	3	11.1%	1	3.7%
TOTAL (per survey)	27	100.0%	27	100.0%

Source: OIG analysis of AHS and CPS human resources data

^a The Bureau hires between 2,000 and 3,000 FRs for 180 days to complete the AHS.

According to Bureau officials, they did not terminate AHS FRs because many of the investigations did not conclude until near or after the end of the data collection period. Since most of the AHS FRs are temporary employees, their appointments had already expired. The regional offices initiated removal for two of the three AHS FRs that remained active, but did not remove them and could not provide documentation to justify why they were not removed. The regional office placed the other active FR and the FR's work into supplemental review. For the 10 FRs that worked on CPS and remained active, the regional offices initiated removal for 8 of them. Bureau officials stated they did not have sufficient evidence to justify removal or the FRs received lesser forms of disciplinary action, such as a formal warning or a suspension. However, for those who resigned or whose terms expired, we noted that there is no system that ensures Bureau hiring officials are aware of past misconduct in case former FRs reapply. Bureau management stated regional office management was responsible for remembering that these FRs had confirmed falsifications.

Recommendations

We recommend that the Director of the U.S. Census Bureau

14. Ensure that Bureau officials follow Bureau policy to immediately relieve FRs of all survey work if their potential falsification cannot be cleared with a preliminary investigation to ensure they do not continue to collect survey data.
15. Implement a system for tracking FRs with confirmed falsifications so that applicants for FR positions can be appropriately vetted prior to reemployment.

Conclusion

The Bureau carries out recurring surveys that yield valuable data on the U.S. economy and its population. Such data allows decision makers at all levels of government and in the private sector to understand the changes occurring across the country and make informed decisions. Therefore, ensuring that the data provided by these surveys are accurate and reliable is paramount.

Full List of Recommendations

We recommend that the Director of the U.S. Census Bureau do the following:

1. Evaluate alternative strategies to achieve target response rates, particularly in underrepresented units.
2. Establish internal response rate targets to ensure CE estimates are accurate and precise.
3. Periodically review statistical measures for managing nonresponse to ensure measures are updated and appropriately communicated to stakeholders in a timely manner.
4. Develop strategies to address respondent refusal in the next CED survey redesign.
5. Ensure that regional offices adhere to prescribed telephone interview rates or work with BLS to adjust them as needed.
6. Ensure all surveys and regional offices maximize the use of data analysis and monitoring tools to oversee survey quality and performance.
7. Ensure RI requirements are met and completed in a timely manner.
8. Reevaluate the effectiveness of the CED survey RI lag time metric.
9. Establish a policy and criteria for discrepancy adjudication to determine when cases should be referred for investigation.
10. Ensure that falsification investigation requirements are met and completed in a timely manner.
11. Issue a formal policy explaining the falsification investigation process and specifying the documentation required to support the investigation's findings and outcome.
12. Ensure that staff are trained on completing adequate falsification investigations.
13. Strengthen the quality control plan for the CPS by evaluating cases worked by FRs with confirmed falsifications to assess the impact on survey estimates.
14. Ensure that Bureau officials follow Bureau policy to immediately relieve FRs of all survey work if their potential falsification cannot be cleared with a preliminary investigation to ensure they do not continue to collect survey data.
15. Implement a system for tracking FRs with confirmed falsifications so that applicants for FR positions can be appropriately vetted prior to reemployment.

Summary of Agency Response and OIG Comments

On August 2, 2023, we received the Bureau's response to our draft report. In response to our draft report, the Bureau concurred with all our recommendations and described actions it has taken, or will take, to address them. The Bureau also provided technical comments. We considered these comments and made changes in the final report where appropriate. We have included the Bureau's formal comments in appendix E.

We are pleased that the Bureau concurs with our recommendations and look forward to reviewing its proposed action plan.

Appendix A: Objective, Scope, and Methodology

The objective of this audit was to determine whether reimbursable surveys conducted by the Bureau's Demographic Programs Directorate provide quality and reliable data to sponsoring federal agencies to make informed decisions. As part of this review, we (1) determined whether performance metrics were met, (2) determined whether quality assurance processes were carried out, and (3) assessed the impact of data quality issues on survey sponsors.

We scoped our testing to focus on reimbursable surveys that have an in-person or telephone data collection component, a high dollar cost, a large sample size, and a high impact on the U.S. economy, and were carried out by divisions within the Demographic Programs Directorate during FYs 2019–2021. Specifically, these were the CPS, AHS, and CE (which includes CEQ and CED).

To accomplish our objective, we performed the following actions:

- Reviewed relevant laws, regulations, standards, policies, and guidance, including
 - U.S. Office of Management and Budget, *Standards and Guidelines for Statistical Surveys*, dated September 2006
 - U.S. Office of Management and Budget, *Information Quality Guidelines*, dated 2002
 - U.S. Office of Management and Budget, *Survey Design Guidance*, dated 2006
 - U.S. Office of Management and Budget, *Circular A-11*, dated 2016⁵⁴
 - U.S. Department of Commerce, *Agreements Handbook*, dated November 2011
 - U.S. Census Bureau, *Statistical Quality Standards*, dated 2013⁵⁵
 - U.S. Census Bureau, *Demographic Program Survey Abstracts*, dated 2020
 - U.S. Census Bureau, *Policy on Accepting Reimbursable Projects*, dated 2009
 - U.S. Census Bureau, *Activity-Based Management Program SLC & MES*, dated 2013
 - U.S. Census Bureau, *Regional Office Administrative Memorandum No. 2018-36*, dated 2018
 - U.S. Census Bureau, *Design and Methodology, Current Population Survey Technical Paper 66*
 - U.S. Census Bureau, *Design and Methodology, Current Population Survey Technical Paper 77*
 - U.S. Census Bureau, *CPS Master Quality Assurance Plan*

⁵⁴ Although an updated version of this document has been issued since the start of this audit, we used the document that was applicable to the scope of our audit of FYs 2019-2021.

⁵⁵ See previous footnote.

- U.S. Census Bureau, *CED Master Quality Assurance Plan*
- U.S. Census Bureau, *CEQ Master Quality Assurance Plan*
- U.S. Census Bureau, *FLD Surveys Memorandum 2017-02*, dated 2017
- U.S. Census Bureau, *FLD Surveys Memorandum 2021-04*, dated 2021
- Interviewed key personnel to gain an understanding of how the Bureau carries out reimbursable surveys:
 - Demographic Programs Directorate personnel, including the Associate Director for Demographic Programs, Assistant Director for Demographic Programs, Demographic Statistical Methods Division Chief, Demographic Statistical Methods Division Internal Audit Group, Reimbursable Survey Operations Directors, and the Demographic Systems Division Chief
 - Field Operations Directorate personnel, to include the Chief of the Field Division, Deputy Chief of the Field Division, Branch Chief & Team Lead for the Labor and Crime Surveys Branch, and the Assistant Division Chief for Census & Survey Analytics
 - Survey sponsor officials from BLS and HUD
- Accessed the following Bureau systems:
 - The Demographic Programs Directorate's intranet workspaces via the Bureau's Virtual Desktop Interface
 - The Unified Tracking System
 - The sFIT

We first tested for the implementation of prior recommendations based on our May 2014 investigative report.⁵⁶ Secondly, we assured the congruence between those standards currently set by the Bureau and those mandated by OMB. Finally, we used a risk assessment matrix to rank and rate surveys based on inherent risks and the potential impact of failure. We then selected surveys based on the risk of noncompliance with quality standards for detailed testing.

Such testing included

- Establishing the extent to which staff are utilizing available management tools and properly reviewing management and data quality reports to improve response rates, data collection activities, and data quality
- Substantiating whether Bureau divisions met or exceeded general quality metrics
- Determining whether the management, processing, and reporting of survey data complied with relevant laws, policies, procedures, and survey sponsor requirements
- Examining a statistical sample of cases of each survey to assess compliance with procedures and the adequacy and timeliness of falsification investigations. Specifically, we selected four random, stratified samples of falsification investigations that were

⁵⁶ 14-0073.

completed in FYs 2019–2021 for each of the four surveys. The cases within each sample were proportional to the four different outcomes (see finding II.B). For the AHS, the sample was 61 out of 650 cases. For the CED, it was 48 out of 150. For the CEQ, it was 54 out of 250. For the CPS, it was 66 out of 2,300. Each sample produced estimates at a 90 percent confidence level and a margin of error of no greater than 10 percentage points. Therefore, we used the results of our testing to project over the respective populations of investigations for each survey.

- Reviewed reports on unit and item response rate, coverage ratios, diary placement rate, annual cost estimate memo and project schedules, and any additional documents with requirements related to the CE.
- Followed up on the telephone interview rate, diary placement rate, outcome code breakout, how the survey is conducted, performance metrics, documentation available, RI system test results and error reports, weighting threshold, survey manuals, noninterview case codes and duplicates, the Bureau's efforts to improve or mitigate issues surrounding staffing, response, and Type A & B cases.

We gained an understanding of internal control processes significant within the context of the audit objective by interviewing Bureau and sponsor officials and reviewing documentation for evidence that the Bureau carried out internal control procedures. We reported the internal control weaknesses in the Objective, Findings, and Recommendations section of this report. We identified one control weakness that had been resolved prior to our fieldwork, which we communicated to Bureau management. Our audit found no incidents of fraud, illegal acts, or abuse.

To assess the reliability of survey data used for our analyses, we compared the data with other available supporting documents to determine data consistency and completeness. We also performed reasonableness testing, such as looking for missing fields, duplicative records, invalid timeframes, or illogical relationships between data elements, to identify any errors. Based on these efforts, we believe the information we obtained is sufficiently reliable for this report.

We conducted our review from January 2022 through January 2023 under the authority of the Inspector General Act of 1978, as amended (5 U.S.C. §§ 401–424), and Department Organization Order 10-13, dated October 21, 2020. We performed our fieldwork remotely.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence that provides a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Appendix B: CPS and CE Response Rates

Table B-I. CPS Monthly Response Rates in FYs 2019-2021^a

Month	FY 2019	FY 2020	FY 2021
October	84.8	83.2	80.3
November	84.0	83.0	79.3
December	82.9	82.3	76.7
January	83.1	81.7	78.2
February	82.7	82.3	78.0
March	81.5	73.0	76.2
April	83.0	69.9	78.8
May	82.0	67.4	78.4
June	82.4	64.9	76.3
July	82.3	67.2	76.6
August	83.6	70.2	76.9
September	83.0	79.0	75.0
Average	82.9	75.3	77.6

Source: BLS⁵⁷

^a Response rate averages are reported by OIG and rounded to the nearest tenth of one percent.

⁵⁷ U.S. Bureau of Labor Statistics. *Household survey response rates* [online]. <https://www.bls.gov/osmr/response-rates/household-survey-response-rates.htm> (accessed March 29, 2023).

Table B-2. CED Monthly Response Rates in FYs 2019-2021^a

Month	FY 2019	FY 2020	FY 2021
October	57.0	55.2	41.5
November	54.5	51.9	39.2
December	51.8	47.2	35.9
January	59.6	50.9	42.4
February	56.1	52.5	42.3
March	57.2	38.7	46.5
April	59.8	28.3	45.2
May	55.5	28.4	47.0
June	55.5	30.6	46.7
July	59.4	29.2	46.1
August	58.9	34.4	46.1
September	56.6	44.5	41.5
Average	56.8	41.0	43.4

Source: BLS⁵⁸

^a Response rate averages are reported by OIG and rounded to the nearest tenth of one percent.

⁵⁸ *Ibid.*

Table B-3. CEQ Monthly Response Rates in FYs 2019-2021^a

Month	FY 2019	FY 2020	FY 2021
October	56.6	54.7	47.6
November	54.2	50.2	46.6
December	53.8	50.3	45.8
January	57.6	53.2	43.7
February	54.3	52.3	46.0
March	55.2	51.5	48.6
April	55.5	46.3	45.9
May	55.0	47.0	46.4
June	53.1	44.8	48.2
July	55.1	40.3	46.3
August	52.7	43.4	46.6
September	52.0	50.3	46.0
Average	54.6	48.7	46.5

Source: BLS⁵⁹

^a Response rate averages are reported by OIG and rounded to the nearest tenth of one percent.

⁵⁹ *Ibid.*

Appendix C: Reinterview and Falsification Process

For each of the four surveys we reviewed, the Bureau conducts RI to assess whether FRs followed procedures when conducting interviews. The RI process includes selecting a percentage of completed FR interviews for verification. The selections can be random or at the discretion of management (on a supplemental basis). Random RIs preselect a subsample of cases from the survey sample and are stratified based on FR experience level. Less experienced FRs are selected at a higher rate than more experienced FRs. In supplemental RIs, regional office managers select specific interviews for RI for those FRs suspected of falsification or to check the work of a new FR.

If the Bureau discovers data discrepancies or irregularities during RI, it conducts a second quality control review, called a falsification investigation, to determine whether an FR falsified the original interview.

The Bureau has guidance on how to document falsification investigations, which are to be completed within 60 calendar days. Such investigations have four possible outcomes:

- Confirmed falsification – the FR was found to have falsified the original interview.
- Cleared of falsification but did not follow procedures – the FR did not falsify the interview but did not follow procedures.
- Cleared of falsification and followed procedures – the FR did not falsify the interview and followed procedures.
- Miskey – the RI performed at a telephone contact center was misclassified as a suspected data irregularity.

Appendix D: Survey Discrepancies

Table D-I provides a list of possible case discrepancy codes. Discrepancies 1, 5, and 10 are automatically sent forward for investigation; discrepancies 2–4, 6–9, and 11 are not.

Table D-I. List of Case Discrepancy Codes

Discrepancy Codes (applicable to all surveys)
1. Household not contacted per RI respondent.
2. Original status incorrect.
3. Type B/C ^a status by observation incorrect.
4. Type A ^b status incorrect.
5. Classified interview Type A unit as Type B/C.
6. Original status incorrect per RI respondent.
7. Household roster incorrect.
8. Not all questions asked in original interview.
9. FR conducted telephone interview instead of personal visit.
10. FR did not use laptop.
11. FR entered bad telephone number.
Discrepancy Codes (applicable to CED only)
12. Make-up of the consumer unit(s) incorrect.
13. Diary was not dropped off.
14. Consumer unit either <ul style="list-style-type: none"> • had expenses for blank diary, • did not record or have recalled expenses for a completed diary, or • did not have recalled expenses for a Type A-326 diary.
15. The RI respondent indicated that the original Type B status for Week 1 was incorrect for a Week 2 interview.
16. The RI respondent said the contact person for an original Type A -Temporarily Absent outcome was not responsible for the care of the residence.

Source: AHS, CED, CEQ, and CPS discrepancy data provided by the Bureau for FYs 2019–2021

^a Type B noninterview is an outcome for units that are unoccupied or occupied solely by persons who are not eligible for interview. Examples include units that are vacant, under construction, or occupied by persons with a usual residence elsewhere. Type C noninterview is an outcome for units that are permanently ineligible for sample, such as demolished or condemned units.

^b Type A noninterview is an outcome for households or consumer units who are eligible for an interview but for whom an FR could not get an interview, such as respondents who refused to participate or were not home.

These tables show the discrepancies the Bureau investigated for each survey.

Table D-2. AHS Discrepancies in FYs 2019 and 2021^a

FY^b	Discrepancies Automatically Investigated (Percent)	Discrepancies Investigated (Percent)	Discrepancies Not Investigated (Percent)	Total Discrepancies
2019	200 (13)	300 (20)	1,000 (67)	1,500
2021	350 (22)	450 (28)	800 (50)	1,600
Total	550 (17)	750 (23)	1,900 (59)	3,200

Source: OIG analysis of AHS RI discrepancy data

^a Disclosure avoidance techniques used to protect respondent confidentiality have been applied to these data per Bureau guidance. Totals and percentages may not sum due to rounding.

^b The AHS is conducted in odd-numbered years.

Table D-3. CED Discrepancies in FYs 2019-2021^a

FY	Discrepancies Automatically Investigated (Percent)	Discrepancies Investigated (Percent)	Discrepancies Not Investigated (Percent)	Total Discrepancies
2019	60 (20)	70 (23)	150 (50)	300
2020	40 (16)	40 (16)	150 (60)	250
2021	50 (17)	50 (17)	200 (67)	300
Total	150 (19)	200 (25)	550 (69)	800

Source: OIG analysis of CED RI discrepancy data

^a Disclosure avoidance techniques used to protect respondent confidentiality have been applied to these data per Bureau guidance. Totals and percentages may not sum due to rounding.

Table D-4. CEQ Discrepancies in FYs 2019-2021^a

FY	Discrepancies Automatically Investigated (Percent)	Discrepancies Investigated (Percent)	Discrepancies Not Investigated (Percent)	Total Discrepancies
2019	80 (8)	110 (10)	800 (80)	1,000
2020	60 (8)	70 (9)	650 (81)	800
2021	60 (8)	70 (9)	600 (80)	750
Total	200 (8)	250 (10)	2,100 (84)	2,500

Source: OIG analysis of CEQ RI discrepancy data

^a Disclosure avoidance techniques used to protect respondent confidentiality have been applied to these data per Bureau guidance. Totals and percentages may not sum due to rounding.

Table D-5. CPS Discrepancies in FYs 2019-2021^a

FY	Discrepancies Automatically Investigated (Percent)	Discrepancies Investigated (Percent)	Discrepancies Not Investigated (Percent)	Total Discrepancies
2019	750 (24)	800 (26)	1,600 (52)	3,100
2020	600 (23)	750 (29)	1,300 (50)	2,600
2021	600 (24)	650 (26)	1,300 (52)	2,500
Total	2,000 (24)	2,200 (27)	4,200 (51)	8,300

Source: OIG analysis of CPS RI discrepancy data

^a Disclosure avoidance techniques used to protect respondent confidentiality have been applied to these data per Bureau guidance. Totals and percentages may not sum due to rounding.

Appendix E: Agency Response



UNITED STATES DEPARTMENT OF COMMERCE
U.S. Census Bureau
Office of the Director
Washington, DC 20233-0001

MEMORANDUM FOR: Arthur L. Scott Jr.
Assistant Inspector General
For Audit and Evaluation
Office of Inspector General

From: Robert L. Santos *Robert L. Santos*
Director
U.S. Census Bureau

Subject: U.S. Census Bureau's Response to the Office of the Inspector General's Draft Report: *"The Census Bureau Needs to Improve Its Performance Management Processes and Quality Control Program for the Reimbursable Surveys Program"*

Thank you for the opportunity to provide comments to the Office of Inspector General's draft report titled, *"The Census Bureau Needs to Improve Its Performance Management Processes and Quality Control Program for the Reimbursable Surveys Program"* dated June 28, 2023. The U.S. Census Bureau respectfully submits the attached comments.

Attachment

[census.gov](https://www.census.gov)



**U.S. Census Bureau Comments on Office of Inspector General Draft Report:
“The Census Bureau Needs to Improve Its Performance Management Processes and Quality
Control Program for the Reimbursable Surveys Program”
July 2023**

General Comments:

The U.S. Census Bureau appreciates the opportunity to respond to the draft report “*The Census Bureau Needs to Improve Its Performance Management Processes and Quality Control Program for the Reimbursable Surveys Program.*” We have high standards for data quality and fully appreciate the efforts of the Department of Commerce Office of Inspector General (OIG) in providing feedback on our program. Your report details seven findings and several recommendations that the U.S. Census Bureau accepts and will address moving forward. The survey landscape has changed over the past ten to fifteen years and we have worked to adapt to these evolving circumstances so we may continue to collect quality data and remain good stewards for our survey sponsors.

The OIG selected the Consumer Expenditure Survey (CE), Current Population Survey (CPS), and American Housing Survey (AHS) and assessed their performance based on respective quality metrics during calendar years 2019, 2020, and 2021. As the OIG report indicates, the COVID-19 pandemic had a significant impact on survey operations during two of the years evaluated – 2020 and 2021. During this period, the Census Bureau had to adjust normal operations and protocols as the nation learned in real time the severity and impact of the pandemic. Virtually overnight, Census Field and Headquarters staff were consigned to 100% telework started March 2020 and tasked with reaching respondents to complete surveys originally designed to be in person.

We have already taken steps since the start of this evaluation to adjust our telephone interview rates, reinterview lag time, and the timeliness and documentation of the falsification investigation process. The U.S. Census Bureau looks forward to your final report and the chance to document and execute a final action plan.

We have the following comments regarding the seven findings and subsequent recommendations in your draft report.

FINDING I.A.: The bureau did not meet data collection targets and faces declining response rates.

The Census Bureau agrees with the finding that response rates have been declining across Demographic Household Surveys. There is an increased reluctance, nationally, to respond to surveys. Indeed, the broader federal statistical system has been grappling with this challenge for years and we continue to research, test, and explore other ways to collect and produce statistics about our nation and its economy.

RECOMMENDATION 1: Evaluate alternative strategies to achieve target response rates, particularly in underrepresented units.

The Census Bureau concurs with this recommendation and will continue to evaluate alternative strategies to increase response rates. Alongside our sponsoring agencies, we continue to explore alternative modes of data collection, the impact of incentives, and data supplementation. The Current Population Survey (CPS) is currently developing an internet self-response option as well as transitioning into new enterprise systems. We hope the CPS modernization efforts can inform decision making amongst other survey programs thus making survey operations more efficient and effective for field staff and optimal for respondents.

RECOMMENDATION 2: Establish response rate targets to ensure CE estimates are accurate and precise.

The Census Bureau concurs with this recommendation. We will work internally to establish response rate goals for each cycle of CE and document the necessary steps to reach those goals. Nonresponse bias is the more urgent substantive concern for CE. Official response rate targets need to be based on strategic input, e.g., empirical influence factors (such as field staff vacancies, individual area characteristics, etc.) and initiatives tailored to those influence factors.

Response rates can play a role in the accuracy and precision of estimates, but they are not the sole determinant. Even with response rates that are lower than desired, it is possible for estimates to have acceptable accuracy and precision based on other factors like the representativeness of respondents, weighting methods, and nonresponse bias. Therefore, while response rate targets can provide some assurance about the quality of the estimates, in the current survey environment there will likely be an increasing need to focus on data collection methods, weighting, nonresponse bias analysis, and related methods to produce estimates with sufficient accuracy and precision.

RECOMMENDATION 3: Review statistical measures for dealing with nonresponse periodically to ensure the measures are updated and appropriately communicated to stakeholders in a timely manner.

The Census Bureau concurs with this recommendation. As response rates decline, the likelihood increases that there are detectable differences between respondents and nonrespondents, introducing a risk that the data are not fully representative of the population. The Census Bureau conducts analyses to detect potential biases, and applies weighting adjustments to ensure the

final data product is statistically representative and of high quality to inform key policy decisions.

Understanding that response rate trends across all surveys have been declining for decades, the Census Bureau continues to advance its methods for conducting these types of analyses and mitigating potential biases. The Census Bureau securely maintains a rich repository of demographic and economic data and is proactively exploring how we can evaluate the quality of survey-derived data as efficiently and timely as possible. Methods that include post-collection adjustments to weighted distributions to account for additional substantive dimensions which vary by response distribution are being developed and evaluated. Administrative data are also being used in developing adaptive design procedures, editing and imputation procedures, and for evaluation. Bringing data into these areas of survey procedures from outside the survey response distributions helps ensure that the collected data best represent the actual population distributions of important characteristics.

FINDING 1.B.: The Bureau did not meet performance measurement goals for diary placement and telephone interview rates.

The Bureau accepts this finding. In 2019, telephone interviewing rates exceeded the maximum limit due to respondent reluctance to complete in-person interviews on federal surveys. Respondents demonstrated a marked preference for telephone contact, and in many cases, it the most reliable method for contacting households. Field Representatives (FRs) sometimes find that respondents are more willing to complete the survey by phone than in person and thus offer that option to avoid a complete refusal. The sponsor has indicated that while an in-person interview is preferred, a telephone interview is acceptable when the respondent is unwilling to participate in person.

Field operations were modified March 2020 – April 2021 to protect the health and safety of FRs and respondents. These modifications prohibited or limited in-person contact with respondents which resulted in higher telephone interviewing rates. Even after April 2021, there was a reluctance among respondents to agree to in-person survey administration which necessitated reliance on telephone interviewing.

CED cases can result in a “diary placed too late” outcome for several reasons including, instrument or hardware malfunction, respondent availability for diary pick-up, and FR delay in assigning a final outcome code in an effort to maximize the time allotted to gain respondent cooperation. In most instances, cases with a “diary placed too late” outcome involve a respondent who is unwilling to participate and thus the case was going to be some form of Type A Non-Interview anyway. Overall, these occurrences are relatively infrequent, and the Bureau has reports and monitoring procedures in place to remind FRs of when action is required to avoid a “diary placed too late” outcome. FRs are notified daily via email and phone of cases with upcoming pick-up dates to ensure all cases are completed whenever possible, and that non interviews are coded accurately to best reflect the true nature of the outcome.

RECOMMENDATION 4: Develop strategies to address respondent refusal in the next CED survey redesign.

The Census Bureau concurs with this recommendation. However, the BLS is responsible for the survey's design and its data collection methodology. The Census Bureau is committed to continually improving interviewer training and on-the-job coaching of field staff to strengthen our interviewing staff's ability to reach and engage with respondents and reduce nonresponse. Additionally, Field Division (FLD) identifies their strongest interviewers and deploys them in hard-to-enumerate areas to conduct nonresponse follow-up. Furthermore, the BLS and the Census Bureau have designed and implemented many research projects over the years to examine ways that we can reduce nonresponse, reduce respondent burden, and improve the respondent experience, such as offering conditional and unconditional monetary incentives to respondents, testing different contact strategies, and providing an alternate mode of data collection. These research efforts led to the implementation of a Consumer Expenditure Diary that is available online to our respondents who would prefer the convenience of a web-based diary rather than a paper form.

RECOMMENDATION 5: Ensure that regional offices adhere to prescribed telephone interview rates or work with BLS to adjust them as needed.

We concur with this recommendation. Based on current feedback (persistent respondent COVID concerns, cost considerations, gaining cooperation factors, respondent convenience), higher telephone interviewing rates may be here to stay, and the thresholds should be adjusted accordingly. However, the CEQ was designed to be primarily administered in person, with telephone interviewing used only as a fallback measure. Therefore, there are protocol changes that we need to develop and implement if we are to continue at the current levels of telephone interviewing.

The Bureau plans to implement telephone interview rate monitoring procedures similar to what is done for other key metrics like cost and progress. Telephone interview rates will be:

- regularly conveyed to ROs and FRs via memo
- monitored by both RO supervisors and Headquarters (HQ) for compliance and outliers
- enforced with those that are non-compliant via counseling and retraining as needed

FINDING II.A.: The Bureau did not meet RI completion goals and RIs were not completed timely.

The Bureau acknowledges this finding. However, we note that CED and CEQ met all reinterview (RI) completion goals in 2019 and 2021, and CPS met its completion goal in 2021. The Bureau concurs with the fact that all surveys experienced challenges meeting completion goals in 2020 because of COVID related staffing and operational limitations. Regarding the timeliness of RI case completions, all RI staff are expected to complete their RI work on a flow basis as it is received, and supervisors are monitoring RI completion, following up on inactive or stagnant RI cases as needed, to aid in the timely completion of these cases.

RECOMMENDATION 6: Ensure all surveys and regional offices maximize the use of data analysis and monitoring tools to oversee survey quality and performance.

The Census Bureau concurs with this recommendation. We will continue to use Field Quality Monitoring (FQM) Analysts, located in each RO, to conduct a thorough investigation of all FRs who are identified as having one or more outlier metrics. Examples of key outlier metrics include the amount of time in the instrument and the number of item level ‘don’t knows’ and refusals. FQM staff use FQM tools (dashboard of outcomes and metrics as defined by each survey and reports) as well as trace files and Unified Tracking System (UTS) reports to decide if the outlier(s) is(are) explainable and therefore not an issue or if the FR needs retraining, supplemental reinterview, or an observation to help correct the outlier(s).

RECOMMENDATION 7: Ensure RI requirements are met and completed in a timely manner.

The Census Bureau concurs with this recommendation. The Bureau will continue to monitor RI completion progress daily and follow up as needed to address lags in completion progress. Further, we will explore modifying our workflow and systems to facilitate more timely completion of RI cases.

RECOMMENDATION 8: Reevaluate the effectiveness of the CED survey RI lag time metric.

The Census Bureau concurs with this recommendation. We recognize CED interviewers have an additional contact with the respondent when they collect the diary. As a result, we have created an additional CED RI lag time metric to reflect this. The additional lag time metric measures the number of days between the diary pickup and the completion of the reinterview. We have incorporated this new metric in the 2023 CED Quality Assurance (QA) plan and 2023 progress reports. We are also retrospectively incorporating the new metric in the CED annual QA reports for 2020 through 2022 and will re-release to the sponsor. We calculated average reinterview lag times from diary pickup for calendar years 2019 through 2021 for comparison to the legacy average reinterview lag times over these timeframes, which can be seen in Figure 1 of the OIG audit report. The calculations yielded the following results:

CED Average Reinterview Lag Times (in Days) in Calendar Years 2019 - 2021

	2019	2020	2021
Legacy Average Reinterview Lag Time*	35.12	28.98	32.83
Average Reinterview Lag Time from Diary Pickup	22.62	20.17	22.19

Source: U.S. Census Bureau 2019, 2020, and 2021 Consumer Expenditure Diary Survey Reinterview Data.

*The legacy average reinterview lag time is the number of days between the original interview and the reinterview.

FINDING II.B.: The Bureau did not investigate cases with discrepancies for falsification.

The Census Bureau acknowledges this finding. Policy within FLD differentiates between discrepancies and suspected falsification. Discrepancies are thoroughly reviewed by a coordinator and/or Regional Survey Manager (RSM) to determine whether a full investigation is needed based on the individual circumstances of the case. The presence of a discrepancy does not always necessitate a suspected falsification investigation.

RECOMMENDATION 9: Establish a policy and criteria for discrepancy adjudication to determine when cases should be referred for investigation.

We concur with this recommendation and will pursue the development of specific guidelines for coordinators and RSMs to follow when evaluating discrepancies. These guidelines will be communicated and distributed to all RO supervisors via memo and reinforced annually in a training.

FINDING II.C.: The Bureau did not adequately document or timely complete falsification investigations.

The Census Bureau accepts this finding as some suspected falsification investigations were not completed in a timely fashion and lacked documentation. Currently, ROs have a process and timeline they are expected to follow for initiating and completing suspected falsification investigations. Those processes are documented and shared via memorandum guidance. The memo includes step by step instructions and was updated on May 22, 2023.

RECOMMENDATION 10: Ensure that falsification investigation requirements are met and completed in a timely manner.

The Census Bureau concurs with this recommendation. Modifications are being made to Survey Field Investigation Tool (sFIT) to facilitate comprehensive monitoring of suspected falsification investigation progress by HQ staff. This will allow HQ staff to view investigation progress and lags, follow up on investigations that are in danger of exceeding the allotted duration, and enforce falsification investigation requirements. This monitoring will be in addition to the monitoring already being performed by RO managers.

RECOMMENDATION 11: Issue a formal policy explaining the falsification investigation process and specifying the documentation required to support the investigation's findings and outcome.

The Census Bureau concurs with this recommendation. The Bureau already has an established policy and issued an updated memo on May 22, 2023, to the ROs detailing all suspected falsification investigation procedures and protocols. This memo describes the tools that should be used, and the multi-step process, for investigating and approving findings for cases with data irregularities, as well as how to handle administrative leave for FRs that are being investigated. This memo also provides templates for the ROs to use when sending formal communication to FRs about cases with data irregularities.

RECOMMENDATION 12: Ensure that staff are trained on completing adequate falsification investigations.

The Census Bureau concurs with this recommendation. Building on the memo described above, the Bureau will pursue the development of an annual data falsification investigation training to

be taken by all RO supervisors. This training will serve as a regular concept reinforcement tool for data falsification investigation procedures, and completion will be tracked and enforced by RO leadership and HQ.

FINDING I.D.: The Bureau did not rework Current Population Survey cases completed by field representatives (FRs) with confirmed falsifications.

The Census Bureau acknowledges this finding. The current design and timeline for the CPS does not allow for reworking cases completed by FRs with confirmed falsifications. Best practice is to reassign the specific cases that have been confirmed to another FR or FS for subsequent interview periods.

RECOMMENDATION 13: Establish a quality control plan for the CPS and take action to rework cases of FRs with confirmed falsifications.

The Census Bureau concurs with this recommendation. CPS will revisit its existing quality control plan to ensure it addresses the evaluation of the prior work of confirmed falsifiers and any subsequent impact on estimates. Once an FR is suspected of falsification, their workload is shifted to another staff member for collection. The CPS timeline, which requires that data be processed and released to the public approximately 10 days after the completion of each month's data collection, makes it infeasible to rework cases once the data collection window is closed. The Census Bureau does, however, review confirmed falsifications to determine whether those cases have a statistically significant impact on the data product. Should this be the case, the Census Bureau would work with BLS on the best way to inform the public which could include reissuing the data if appropriate.

FINDING III.: Regional offices did not relieve FRs from survey data collection during falsification investigations and systematically track confirmed falsifications for use in future hiring decisions.

The Census Bureau acknowledges this finding. The Bureau has an established mechanism to place employees under investigation for suspected data falsification on administrative leave during the course of the investigation. This process was established in coordination with our Human Resources and Legal departments to ensure the process protects the integrity of the data we collect while honoring the legal rights of the employees in question.

RECOMMENDATION 14: Ensure that Bureau officials follow Bureau policy to immediately relieve FRs of all survey work if their potential falsification cannot be cleared with a preliminary investigation to ensure they do not continue to collect survey data.

The Census Bureau concurs with this recommendation. Procedures for placing employees being investigated for suspected data falsification on administrative leave and removal of work assignments have been provided to RO staff via an updated memo May 22, 2023, and will be covered in a training planned for implementation in the future to be completed annually.

RECOMMENDATION 15: Implement a system for tracking FRs with confirmed falsifications so that applicants for FR positions can be appropriately vetted prior to reemployment.

The Census Bureau concurs with this recommendation. The Bureau will explore how to automate checks for applicants seeking reemployment to ensure they were not previously involved in any

confirmed cases of falsification. We will need to overcome several challenges to accomplish this including:

- Legal implications of making hiring decision based on conduct that was not fully adjudicated prior to separation for applicant that resigned prior to the conclusion of their falsification investigation.
- How to handle situations in which falsification is detected several weeks/months after an employee has separated.
- Limitations of the current clearance process which does not evaluate prior employment history until after the hire is complete.

Further, the Bureau will pursue the addition of a notification in future job announcements stating staff found to falsify data will be terminated and ineligible for reemployment.