



Testimony of

The Honorable Todd J. Zinser
Inspector General

U.S. Department of Commerce

before a hearing of the

Committee on Oversight and Government Reform
Subcommittee on Federal Workforce, U.S Postal Service,
and the Census

U.S. House of Representatives

U.S. Census Bureau: Addressing Data Collection Vulnerabilities

September 18, 2014

Chairman Farenthold, Ranking Member Lynch, and Members of the Subcommittee:

We appreciate the opportunity to testify today on vulnerabilities in Census Bureau data collection and quality assurance processes. The Census Bureau is best known for its Constitutional duty to count the population and housing every 10 years; however, throughout the year the Census Bureau conducts many other surveys. The Census Bureau entirely funds some of these surveys; others it jointly sponsors with other agencies, or conducts on behalf of other agencies on a reimbursable basis. For example, the Census Bureau jointly sponsors the Current Population Survey (CPS) with the Bureau of Labor Statistics (BLS). The CPS is the primary source of labor force statistics in the United States and the results of the survey are used to generate the national unemployment rate every month.

The Census Bureau's conduct of the CPS by its Philadelphia Regional Office became the subject of allegations of widespread data falsification, including that the Philadelphia Regional Office manipulated the unemployment survey in the months leading up to the 2012 Presidential election. These allegations were investigated by my office. On May 1, 2014, we issued a public report concerning our findings.

Our testimony today will briefly summarize (1) the allegations concerning the Philadelphia Regional Office and results of our investigation, (2) observations related to Census Bureau falsification policies, and (3) recommendations stemming from our investigation. I request that our entire report of investigation on this matter be made part of the hearing record.

Background

The Census Bureau employs between 9,500 and 10,000 personnel, approximately 7,000 of whom are Field Representatives (i.e., the professional interviewer staff). The Census Bureau recently restructured and realigned its field organization and regional office management structure, reducing the number of regional offices from 12 to 6. In June 2014, we initiated an audit of the restructuring and associated management reforms. One of the objectives of that audit is to determine whether the Census Bureau is meeting, or on pace to meet, the goals of the realignment, as well as the impact of the realignment on its ability to ensure the quality of its surveys.

Over the years, the Department of Commerce Office of Inspector General (OIG) has provided substantial oversight of the Census Bureau. For the 2010 decennial, which cost nearly \$13 billion, OIG issued 30 reports, Congressional testimonies, and other work products during the decade, culminating in a Final Report to Congress in June 2011. Since that time, over the past 3 years, we have issued a dozen more public reports and work products concerning the Census Bureau. On May 21, 2014, for example, we issued, "The Census Bureau Lacks Accurate and Informative Cost Data to Guide 2020 Research Through a Constrained Budget Environment." Among the objectives of our audit was to evaluate the Census Bureau's process for implementing mandatory budget reductions; however, we were unable to make an assessment because we found that the accounting system for the Census Bureau does not contain accurate project cost data. We will continue to focus our oversight on the Census Bureau's preparation for the 2020 decennial.

Allegations Investigated

On October 30, 2013, OIG received information through a web hotline complaint alleging that the Census Bureau's Philadelphia Regional Office falsified data on the CPS. Several weeks later, on November 18, 2013, media reports alleged that the Philadelphia Regional Office had "faked" the national unemployment survey (i.e., CPS) in the months leading up to the 2012 presidential election in order to artificially decrease the unemployment rate. There were also allegations regarding widespread falsification in the Philadelphia Regional Office—and that the Regional Office, along with Census Bureau headquarters management, covered up data falsification.

The key allegations, received from various sources, are summarized into the following questions:

- Did a Survey Supervisor in the Philadelphia Regional Office instruct subordinates to falsify survey data?
- Did a Survey Supervisor change subordinate survey responses to manipulate data, and did he or a second Survey Supervisor prevent falsification reports from being reported to Census Bureau headquarters?
- Did any alleged data falsification on the Current Population Survey in the Philadelphia Regional Office in August and September of 2012 have a measurable impact on the unemployment rate leading up to the 2012 presidential election?

While our investigation did not substantiate the existence of widespread falsification in the Philadelphia Regional Office that artificially decreased the national unemployment rate in the months leading up to the Presidential election in 2012, we did identify several vulnerabilities with respect to the Census Bureau policies and processes for detecting and preventing data falsification—and made a series of recommendations to strengthen the Census Bureau's processes and internal controls.

Methodology

OIG conducted over 100 interviews of current and former Census Bureau employees in the Philadelphia Regional Office, headquarters, and other regional offices. We reviewed documents provided by the complainant, personnel files, a report of investigation concerning an Equal Employment Opportunity Commission (EEOC) complaint relevant to the allegations, training materials, policies for interviewing procedures, quality control and assurance processes, and performance assessments. We also conducted extensive analysis of Census Bureau CPS data and BLS employment statistics data, as well as other data relevant to our investigation. A more detailed description of our methodology is included in appendix A.

Results of Investigation into Survey Falsification Allegations

1. Did a Survey Supervisor in the Philadelphia Regional Office instruct subordinates to falsify survey data?

Our investigation did not substantiate the allegation that a Survey Supervisor instructed his subordinates to falsify survey data. The complaint and one key witness alleged that in a July 26, 2010, conversation the supervisor of the key witness instructed the key witness to falsify survey data and stated that he would cover for the key witness if the key witness was caught. The complainant alleged that on July 27, 2010, the supervisor left a voice mail message for her during which he repeated the instructions he gave to the key witness. There was no copy of the voicemail message kept and the message was not otherwise transcribed by the complainant. The complainant identified two witnesses who had listened to the voice mail message at the time. We interviewed those witnesses and they have varying recollections of the contents of the voice mail message. However, neither of the third-party witnesses recalls the message specifically directing the survey data falsification. OIG interviewed a sample of 50 field staff in the Philadelphia Regional Office, and none of the witnesses reported ever being asked to falsify survey data. The Survey Supervisor who was the subject of the allegations was interviewed, denied ever instructing any employee to falsify survey data, and voluntarily submitted to a polygraph examination, which indicated no deception.

2. Did a Survey Supervisor change subordinate survey responses to manipulate data, and did he or a second Survey Supervisor prevent falsification reports from being reported to Census Bureau headquarters?

Our investigation did not substantiate allegations that the Survey Supervisor or his Manager tampered with subordinate's survey responses or deleted their emails. Our investigation determined that, when a Field Representative enters survey data, the system generates an audit trail (also known as a "trace file"): each entry screen, field update, and entered value is logged by the system and time-stamped. If a Census Bureau employee modifies survey data after the initial entry, the audit trail would list the specific fields that were updated. A supervisor cannot remotely log in as a subordinate and change the subordinate's survey responses; the supervisor would need to use the subordinate's laptop to change recorded responses. OIG reviewed the audit trails for surveys conducted by the key witness and found that the data fields were only entered a single time. In other words, after key witness's initial entry, the audit trails do not indicate that the data was modified or altered. Additionally, we reviewed the audit trails for all of the supervisor's completed CPS cases during July and August 2010, the dates alleged in the complaint, and did not find evidence that the survey supervisor altered cases of the key witnesses or anyone else in an attempt to cover up falsification. To further determine whether supervisors attempted to cover up the key witnesses' falsification during reinterview,¹ we reviewed the reinterview cases—and, combined

¹ Reinterview is the primary quality assurance process used by the Census Bureau to assess the quality of the surveys conducted by Field Representatives.

with the evidence in the audit trails described above, we found no evidence that supervisors tampered with the cases conducted by the key witness to cover up falsification. Further, OIG conducted extensive investigative activities to uncover other examples of supervisors altering survey responses. No other instances were identified. For example, OIG interviewed a sample of 50 field staff in the Philadelphia Regional Office. None of them reported any concerns of supervisors changing survey responses.

3. Did any alleged data falsification on the Current Population Survey in the Philadelphia Regional Office in August and September of 2012 have a measurable impact on the unemployment rate leading up to the 2012 presidential election?

Our investigation did not substantiate the allegation that the national unemployment rate was manipulated by the Philadelphia Regional Office in the months leading up to the 2012 presidential election. Nor did our investigation find any evidence to support that such manipulation is likely from a statistical perspective. OIG performed the following analyses: (1) reviewing the key witness’ case outcomes (e.g. employed, unemployed, not in labor force) to assess whether there was an unexpectedly low number of unemployed cases in his or her workload; (2) assessing whether it was theoretically possible for Field Representatives to artificially depress the unemployment rate through falsification; and (3) considering the likelihood of Field Representative falsification substantively affecting the national unemployment rate in September 2012, given the Census Bureau’s quality assurance procedures, employment data trends, and interviews with more than 75 Philadelphia Regional Office employees.

It is theoretically possible, though unlikely, that a large number of Field Representatives working in concert could depress the unemployment rate through falsification. Our investigation determined that, to move the unemployment rate from 8.1 percent to 7.8 percent (see highlighted portion of the 2012 row in the table below) through falsification between August and September 2012, it would have taken approximately 78 Field Representatives changing all unemployed household members to employed. To do so would also require escaping detection from the Census Bureau’s quality control measures.

National Unemployment Rate by Month

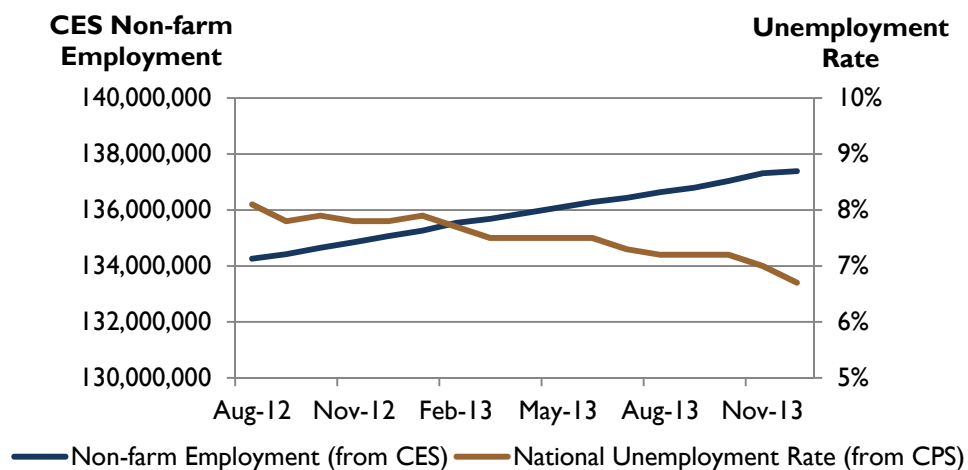
	Jan.	Feb.	Mar.	Apr.	May	June	July	Aug.	Sep.	Oct.	Nov.	Dec.
2012	8.2	8.3	8.2	8.2	8.2	8.2	8.2	8.1	7.8	7.9	7.8	7.8
2013	7.9	7.7	7.5	7.5	7.5	7.5	7.3	7.2	7.2	7.2	7.0	6.7
2014	6.6	6.7	6.7									

Source: BLS

Data trends also support that the drop in unemployment was not the result of falsification. The unemployment rate did not exceed 7.9 percent after August 2012 and continued to fall after the presidential election, meaning that, if the data were affected by falsification, undetected and systematic falsification would have had to continue for several months. Since the unemployment rate declined after the presidential election, it is even less likely that the trend was caused by data falsification.

Alternative employment indicators independent of the CPS (and, in turn, independent of data collected by the Census Bureau) provide further confirmation of this trend. Instead of surveying individuals about their current employment status, as is done by the CPS, the BLS Current Employment Statistics (CES) program surveys businesses monthly about their number of non-farm payroll workers. The CPS surveys individuals in order to determine the percentage of employed people in the United States, while the CES estimates aggregate employment, wages, and hours for several hundred industries. According to CES, between August 2012 and December 2013 the number of employees on business payrolls increased each month (see figure on next page).

CES Non-farm Employment Compared to the National Unemployment Rate



Source: OIG analysis of BLS data

Additionally, ADP, in collaboration with Moody’s Analytics, publishes an independent employment report each month using payroll data from 20 percent of U.S. businesses. Overall, the ADP/Moody’s payroll results closely mirror the CES—the results have a .96 correlation—and show a similar pattern: between August 2012 and December 2013, payroll employment increased every month. If the national unemployment rate decreased primarily as a result of falsification on CPS, it would be unlikely for both CES and the ADP/Moody’s measure to show consistent monthly job growth.

In addition, OIG conducted more than 75 interviews of Philadelphia Regional Office employees at all levels, from senior management to field staff. No witness mentioned any concerns whatsoever about manipulation of the unemployment rate or anything about the 2012 presidential election. In sum, our investigation found no evidence supporting the allegation that the national unemployment rate was manipulated by the Census Bureau's Philadelphia Regional Office management in the months leading up to the 2012 presidential election.

Observations Related to Census Bureau Falsification Policies

1. Survey Supervisors do not consistently use the tools available to them for detecting and preventing survey data falsification.

The Census Bureau currently provides Survey Supervisors with tools to help them identify and prevent falsification. The Unified Tracking System collects paradata—or empirical measurements about the survey process—during and after data collection. The Contact History Instrument is an application in the survey instrument that captures information about each time a Field Representative attempts to contact a household. These tools allow supervisors to analyze specific information regarding a Field Representative's contact attempts with all households in the Field Representative's assignment that could potentially indicate falsification (e.g., an interview conducted after midnight). In our interviews for our investigation, however, we found that some supervisors are not using these tools.

2. Census Bureau employees suspected of falsifying data are sometimes allowed to continue conducting surveys while they are under investigation for falsification.

OIG's investigation determined that procedures related to falsification vary by region—and that Field Representatives who are being investigated for falsification are sometimes allowed to continue to collect survey data during the investigative process. OIG found that one region removes all survey work from a Field Representative who is formally notified of suspected falsification. However, if the Field Representative disputes the claim but the supervisor still pursues the investigative process, the Field Representative is allowed to return to work. In this particular region, the Field Representative is allowed to conduct interviews up to the point that the Employee Relations Board approves termination due to confirmed data falsification.

In speaking with staff from the other regions, we found that the treatment and management of a Field Representative suspected of falsification is largely left to the supervisor's discretion—typically, a Field Representative suspected of falsification has his or her survey work taken away at some point in the process, but it varies. In most regions, the suspected Field Representative's ability to continue to work during the process is determined on a case-by-case basis. Our interviews indicated that this was largely influenced by legal guidance that disfavored placing Field Representatives on administrative leave or pulling their cases while they are under investigation for suspected falsification.

3. The quality assurance operation in the Regional Office is not independent, creating potential conflicts of interest.

For ongoing survey operations (e.g., CPS), within each regional office there is a single set of managers and supervisors who are responsible for both regular interview and reinterview operations. Reinterview helps determine (1) whether interviews are conducted according to proper procedures, (2) instances of data falsification, and (3) response error that arises from specific questions on the survey. Since managers and supervisors are, at least in part, assessed based on the performance of the Field Representatives under their supervision, this arrangement lacks internal controls and creates potential conflicts of interest by asking a supervisor to review the work of Field Representatives on whose performance (at least partially) that supervisor's own performance is assessed.

The quality assurance operation conducted during the 2010 decennial census, in which data collection and reinterview duties were segregated, is more appropriate and eliminates the potential conflicts of interest that ongoing survey operations introduce by asking supervisors to manage both data collection and reinterview. Each Local Census Office during 2010 decennial census operations included a parallel, but separate, organization of office and field staff who were responsible for quality assurance.

4. Current Population Survey procedural manuals and training materials are outdated, inconsistent, and do not discuss falsification.

Certain Census Bureau policies and manuals have not been updated to reflect the reorganized regional office field structure that was finalized in January 2013. At the time of our investigation, regional office staff still used outdated materials to manage survey operations and train new hires. For example, the CPS office manual had not been updated since 2010. The outdated manuals and training materials use outdated terms and the outdated titles assigned to various supervisory and managerial positions. At the very least, outdated materials cause extra work for trainers and confusion during the training process for new hires; at worst, outdated materials and erroneous and conflicting instructions can lead to wasted time in the field and even errors in data collection.

We found that the CPS materials, which the Census Bureau uses to train new hires, do not mention the prohibition against data falsification and its consequences, though the materials do instruct Field Representatives to remind respondents of the possibility of a follow-up visit for reinterview. The materials include numerous references to the Census Bureau's confidentiality policy and every Census Bureau employee is required to swear an oath of office "not [to] disclose any information . . . to any persons[,] either during or after [your] employment." As evidenced by the focus on confidentiality, the Census Bureau has ample opportunity to discuss data falsification and its consequences with new hires.

In contrast to directions given to Field Representatives with respect to ongoing surveys such as the CPS, 2010 decennial census enumerators were given clear and explicit definitions of what constituted falsification, instructions to not falsify data, as well as clearly stated consequences for intentionally falsifying data including termination from employment:

Data falsification is intentionally and deliberately entering wrong information. . . . You must not submit falsified work under any circumstances. If you willfully falsify information . . . , you can be found guilty of perjury . . . and may be fined up to \$250,000 and/or imprisoned up to five years. You may be removed from federal service and prohibited from future federal employment.

Recommendations

As a result of our investigation, we made the following recommendations:

1. Implement a reporting mechanism for confirmed data falsifications to survey sponsors.

Currently, for instance, the Census Bureau does not notify BLS about specific instances of CPS falsification. Irrespective of whether falsification has a statistical impact on survey results, BLS and other survey sponsors have cognizance and should be informed in the interest of transparency and full disclosure.

2. Implement a formal policy that prohibits employees suspected of falsification from collecting survey data during the investigative process.

Under current Census Bureau policies, employees suspected of falsifying data are sometimes allowed to continue working during the falsification investigation. A policy prohibiting suspected data falsifiers from collecting survey data would prevent them from submitting additional inaccurate survey results.

3. Update procedural manuals and training materials to reflect current Regional Office field structure and inform Field Representatives about survey data falsification and the consequences of committing falsification.

Materials used by the Census Bureau to conduct day-to-day survey operations and train new employees include references to obsolete regional office supervisory arrangements and positions. Training materials for new employees do not discuss survey falsification. Educating new employees about survey data falsification and emphasizing the consequences of falsification may discourage Field Representatives from falsifying survey data.

4. Implement an independent quality assurance process for all survey operations.

The Census Bureau assesses supervisor performance, at least in part, by the work of a supervisor's Field Representatives, and the quality assurance process (i.e., reinterview) assesses the quality of the Field Representatives' work. Currently, the same regional office supervisor is responsible for both the interview process and the quality assurance process, creating a potential conflict of interest. During the 2010 decennial census, quality assurance employees and supervisors were independent from other operations, reducing the risk of conflicts of interest.

5. Ensure that all survey supervisors tasked with detecting and preventing survey data falsification are properly utilizing all available tools to safeguard against such misconduct.

While the Census Bureau currently has several tools available for identifying potentially falsified cases, supervisors rely primarily on the quality assurance process. For example, supervisors can also use the Contact History Instrument which provides the time of day Field Representatives attempt to contact respondents. Interviews conducted late at night (e.g., after midnight) are at a greater risk for falsification.

6. Implement internal controls to effectively monitor and limit Field Representative workloads in order to reduce the risk of falsification.

To further reduce the risk for survey data falsification, supervisors should scrutinize workloads and staffing levels to avoid assigning atypically large workloads to Field Representatives.

By memorandum dated July 30, 2014, the Census Bureau Director agreed with our recommendations and summarized the responsive actions taken by the Census Bureau. A copy of the Census Bureau Director's memorandum is included as appendix B.

Appendix A: Methodology

OIG conducted over 100 interviews of current and former Census Bureau employees in the Philadelphia Regional Office, headquarters, and other regional offices. These interviews included:

- The complainant
- The key witness
- Philadelphia Regional Office management who were alleged to have directed or orchestrated falsification
 - OIG conducted a recorded and transcribed interview of each of the managers, as well as several follow-up interviews
 - Polygraph examinations of the managers were also conducted
- Witnesses to the alleged falsification instructions identified by the complainant
- Current and former Philadelphia Regional Office senior management during the relevant time period
- 50 Philadelphia Regional Office field staff (in these interviews, field staff were asked whether they had ever been pressured or ordered to cut corners to complete a survey or to violate Census Bureau policy)
- All current Philadelphia Regional Office Program Coordinators (In these interviews, the supervisors were asked whether they had ever been pressured or ordered to cut corners to complete a survey or to violate Census Bureau policy, as well as become aware of instances of suspected falsification by their subordinates)
- Various other current and former Philadelphia Regional Office staff, both in the field and in the office, deemed relevant to the investigation
- Representatives from Census Bureau headquarters' Field Division, Human Resources, Employee Relations Branch, Legal, and Information Technology
- Chief of the Demographic Statistical Methods Division
- Survey Directors for the CPS and the Consumer Expenditure (CE) Survey
- The Division Chief for Labor Force Statistics, the Division Chief for Data Development and Publications, and supervisory statisticians at the Bureau of Labor Statistics (BLS)
- Survey Statisticians from each of the regional offices
- The New York Regional Office Director

The following documents were reviewed:

- Documents and notes provided by the complainant
- The key witness' and Complainant's personnel files and falsification reports
- Report of Investigation, EEOC Complaint of Key Witness
- Emails regarding the August 2013 American Housing Survey
- Census Bureau training materials, policies for interviewing procedures, quality control and assurance processes, and performance assessment
- Various other documents deemed relevant to the investigation

The following data were analyzed:

- CE and CPS audit trails for cases worked by the key witness
- Labor force case outcomes (e.g. unemployed, employed, not in labor force) for interviews conducted by the key witness
- Statistical analysis performed by the Census Bureau related to how falsification could impact the national unemployment rate
- CPS quality control reports, providing reinterview results by region
- CPS workload report for Field Representatives in the Philadelphia Regional Office
- CPS audit trails for cases completed by managers
- Reinterview cases worked by managers
- Reinterview results for Field Representatives who were suspected of falsifying data during August and September 2012
- Labor force case outcomes (e.g. unemployed, employed, not in labor force) for employees suspected of falsifying data during August and September 2012
- BLS CES data
- ADP/Moody's Analytics employment report data

Appendix B: Memorandum Dated July 30, 2014, from the Director of the U.S. Census Bureau Summarizing the Bureau's Responsive Actions



UNITED STATES DEPARTMENT OF COMMERCE
Economics and Statistics Administration
U.S. Census Bureau
Washington, DC 20233-0001
OFFICE OF THE DIRECTOR

JUL 30 2014

MEMORANDUM TO THE OFFICE OF INSPECTOR GENERAL

TO: Todd Zinser
Inspector General
U.S. Department of Commerce

FROM: John Thompson
Director
U.S. Census Bureau

SUBJECT: U.S. Census Bureau Response to OIG Investigation 14-0073: Public Report Concerning Unsubstantiated Allegations of Data Falsification to Decrease the National Unemployment Rate

In the fall of 2013, the Office of Inspector General (OIG) began a rigorous investigation of alleged data falsification to the American Housing Survey and the Current Population Survey conducted by the U.S. Census Bureau. The Census Bureau is satisfied with the OIG findings that no evidence was found to support the allegations – specifically, that management in a Census Bureau Regional Office (RO) instructed staff to falsify data at any time for any reason. The OIG also found no evidence of systematic data falsification, or evidence that the national unemployment rate was manipulated by staff in the RO in the months leading up to the 2012 presidential election.

The OIG findings confirm that the Census Bureau continues to do what it does best, providing high-quality data about the nation's people and economy. We take this charge seriously and our staff works to promote a culture where data integrity, protecting respondent's privacy, and data confidentiality are paramount. Our quality assurance programs are designed to preserve data integrity and collect accurate information. We also seek to take advantage of innovative, cost-effective approaches that enhance the data quality of our surveys and censuses. The Census Bureau has created a Quality Assurance Working Group to examine our current procedures and identify ways to strengthen our quality assurance practices, taking full advantage of the most current tools and methods available, both at the Census Bureau and within the larger research community.

The Census Bureau appreciates the recommendations offered by the OIG for further improving our quality assurance practices. The OIG recommended six improvements to the Census Bureau's current practices, which we agree will enhance our ability to deter and detect potential data falsification. We are addressing those recommendations as described below:

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Recommendation #1: Implement a reporting mechanism for confirmed data falsifications to survey sponsors.

The Census Bureau currently informs survey sponsors on several of its surveys when falsification is detected. However, the reports with which we share this information are not standardized across all surveys. Therefore, we are developing a more detailed and standardized report for providing feedback for confirmed cases of data falsification to its survey sponsors. Specifically, the Census Bureau has started providing interim quarterly reports for the Current Population Survey (CPS) to the Bureau of Labor Statistics. The interim report provides the status and outcome of the interviewer investigation and includes the control numbers for confirmed falsification cases. This information is provided in a manner that protects the identity of the interviewer and the survey respondent. We are developing a more detailed, standardized falsification report for CPS that we can then use as a standard report for reporting falsification on all surveys conducted by the Bureau.

Recommendation #2: Implement a formal policy that prohibits employees suspected of falsification from collecting survey data during the investigative process.

In the past, field representatives were typically permitted to continue working during a period where suspected falsification on their part was under investigation. The Census Bureau has changed its policies such that field representatives who are suspected of falsifying data are given no further field assignments until 1) the falsification investigation has been completed; and 2) the determination has been made that the field representative did not falsify field data. If the investigation confirms that the employee falsified survey data, then appropriate administrative action, such as termination from employment, is taken against the employee.

Recommendation #3: Update procedural manuals and training materials to reflect current regional office field structure and inform field representatives about survey data falsification and the consequences of committing falsification.

The Census Bureau is currently updating its training materials to strengthen our emphasis on quality control procedures, the importance of collecting quality data, and the consequences of falsifying data. In addition, starting at the beginning of the upcoming rating year and every rating year thereafter, all 7,000 + field representatives will review and sign a data quality agreement that lays out the expectations for maintaining data integrity and the consequences for not doing so. Newly hired field representatives will sign the agreement, as well.

Recommendation #4: Implement an independent quality assurance process for all survey operations.

Development is underway to establish a two-phased approach for implementing an independent, centralized quality control reinterview process for the CPS. Starting July 2014, we will begin Phase 1 (an interim solution) by testing the CPS quality control reinterview process using a

centralized, independent approach located in the Jeffersonville Contact Center (JCC). The test will involve one Regional Office and include randomly selected reinterview cases from CPS with phone numbers. As a part of this interim solution, we will use existing Regional Office control systems and laptops in the JCC to conduct the reinterviews. Cases that cannot be resolved by the JCC (e.g., they have no phone numbers) and must be resolved by the Regional Office will be handled by a staff member other than the supervisor directly responsible for the interviewer who conducted the original interview. Upon refinement of the operational process, we will expand the reinterview to include additional Regional Offices.

Phase 2 will include the development and testing of systems in the Contact Centers, which will eliminate the need to use Regional Office control systems and laptops (i.e., the interim solution for Phase 1). The Census Bureau's goal is that by April 2015, we are using the Contact Centers exclusively for centralized quality control reinterview. Once implemented for CPS, these centralized reinterview operations and procedures will provide the foundation for other surveys to transition to an independent, centralized reinterview process.

Recommendation #5: Ensure that all survey supervisors tasked with detecting and preventing survey data falsification are properly utilizing all available tools to safeguard against such misconduct.

The Census Bureau has several innovative tools that are currently used by supervisors, managers, and analysts to deter and detect interviewer falsification. We continue to enhance the utility of each of these tools by reaching out to users and other stakeholders to identify improvements to reports and ways to enhance training on these tools. These tools include:

- ***Unified Tracking System (UTS)*** – The Unified Tracking System is a data warehouse that provides the user a view of near real-time cost, progress, and quality data, consolidating data from other production systems over time and across surveys. Managers/analysts in the Regional Offices and the Census Bureau Headquarters can monitor surveys by reviewing data such as response rates, contact attempts, item nonresponse rates, and cost data. We continue to enhance the utility of the UTS with outlier reports specific to quality that allow managers to more effectively monitor and detect interviewer falsification (e.g., those with very slow production rates and those who have rates “too good to be true”).
- ***Performance and Data Analysis (PANDA)*** – The Performance and Data Analysis tool is currently used by some surveys to monitor the quality of survey data. Managers in the Regional Office use PANDA to view quality assurance indicator reports, such as nonresponse reports, overnight start reports, and late start and completion rate reports. This tool assists with the identification of potential data falsification.
- ***NICE Interaction Management System (NIM)*** – The Census Bureau currently uses the NICE Interaction Management System to monitor CATI interviews in the Contact Centers. Monitoring is key for the detection of interviewer falsification. Coaches/monitors unobtrusively listen, observe, and assess the interaction between the

interviewer and respondent. All interviews are 100% audio/video recorded using the NIM.

- **Computer-Audio Recorded Interview (CARI)** – The Computer-Audio Recorded Interview methodology can be used to observe interviewers who conduct CAPI surveys. The audio recordings provide managers with another method for confirming the authenticity of the interview and detecting possible interviewer falsification. The Census Bureau is currently using CARI for the Survey of Income and Program Participation (SIPP), and we plan to begin using CARI for the CPS and other surveys.
- **Contact History (CHI)** – The Census Bureau will continue to use the Contact History Instrument for all surveys to capture details of all contact attempts for CAPI surveys. The CHI paradata will serve as an indicator (e.g., late night contact attempts) for potential interviewer falsification.

Recommendation #6: Implement internal controls to effectively monitor and limit Field Representative workloads in order to reduce the risk of falsification.

Management in the six Regional Offices will be issued a memorandum in July 2014 limiting the size of an interviewer's workload on a survey-by-survey basis. Deviation from the workload standard (e.g., a very large monthly workload by a field representative) will require a written explanation for the reason for the deviation from the Regional Director to the Chief of the Field Division. In addition, the Chief of Field Division will have management staff at Headquarters evaluate monthly survey data for anomalous results that appear to be "too good to be true," and will take appropriate follow-up action with the Regional Director to further investigate these issues.

Thank you for your feedback and recommendations. If you have any questions or concerns, please do not hesitate to contact me.