

Discussion of “Notes Toward a Cost-Benefit Theory of Survey Participation”

Brian A. Harris-Kojetin
Statistical and Science Policy
U.S. Office of Management and Budget

*Views expressed are those of the author and do not represent the policies of
the Office of Management and Budget*



Overview

- Privacy and Confidentiality issues
- The Federal context
- Willingness to Participate in Surveys
- Some Thoughts and Suggestions
- Conclusion



1/17

MEDICAL OFFICES

PLEASE SIGN
OUR NEW
PRIVACY FORM.

YOUR RECORDS WILL ONLY BE
SHOWN TO YOUR EMPLOYER,
INSURANCE PROVIDER AND
THEIR FRIENDS...

ANY HEALTH
WORKER WHO
WANTS THEM...

HOMELAND
SECURITY...

AND COMPUTER HACKERS
ABOVE A SIXTH-GRADE
SKILL LEVEL.

IS THERE ANYONE WHO
ISN'T ALLOWED TO SEE
THEM?

OF COURSE!

YOUR
HUSBAND.

THANK HEAVENS
THE PEOPLE WHO LOVE
ME CAN'T GET THEIR
HANDS ON THEM!

© 2010 SIGNE WILKINSON / DIST. BY UFS, INC.

Privacy and Confidentiality

- According to *Private Lives and Public Policies*:
 - Informational privacy encompasses and individual's freedom from excessive intrusion in the request for information and an individual's ability to choose the extent and circumstances under which his or her beliefs, behaviors, opinions, and attitudes will be shared with or withheld from others.



Privacy and Confidentiality

- *Confidentiality* refers broadly to a quality or condition accorded to information as an obligation not to transmit that information to an unauthorized party...Confidentiality has meaning only when the promises made to a data provider can be delivered, that is, the data gatherer must have the will, technical ability, and moral and legal authority to protect the data.



Privacy and Confidentiality

- We often answer respondent's concerns about privacy with assurances of confidentiality
- But if it is “NONE OF OUR BUSINESS,” then how responsive to their concerns is our promise to protect the information?



Confidentiality Pledges

- Survey sponsors and data collectors typically want to promise confidentiality
 - Research ethics and to increase participation
- Under the Paperwork Reduction Act (PRA), OMB reviews pledges made by Federal agencies in their surveys and research studies.
- Federal agencies cannot promise confidentiality without statutory authority
 - Pledge must accurately reflect the laws governing the agency and the information and any limitations on the confidentiality provisions



Other Requirements for informing respondents

- The PRA requires the following basic information must be provided to respondents of Federal surveys:
 - The reasons the information is to be collected;
 - The way the information will be used to further agency purposes and serve agency needs;
 - An estimate of the average burden of the collection and whom to contact about the estimate;
 - Whether responses to the collection of information are voluntary or mandatory, or required to obtain a benefit;
 - The nature and extent of confidentiality to be provided, if any;
 - The duration of respondents' expected involvement
 - If the agency is collecting "sensitive information," respondents should be informed about what type(s) of sensitive information will be requested.



Other Requirements for informing respondents

- IRBs may impose additional disclosure requirements as well as requirements for informed consent (or assent for minors)
 - Consent may be active or passive
- Other applicable laws, such as the Privacy Act, may impose additional disclosure requirements
- CIPSEA imposes specific requirements for confidentiality pledge.



What is CIPSEA?

- Confidential Information Protection and Statistical Efficiency Act of 2002 (Public-Law 107-347)
- Purposes:
 - strengthen and foster public trust in pledges of confidentiality
 - prohibit disclosure in identifiable form
 - ensure that information is used exclusively for statistical purposes



CIPSEA Requirements

- Inform respondents
 - pledge to keep the information confidential using “CIPSEA pledge”
 - pledge that the information will only be used for exclusively statistical purposes



CIPSEA Pledge (example)

- The information you provide will be used for statistical purposes only. In accordance with the Confidential Information Protection provisions of Title V, Subtitle A, Public Law 107-347 and other applicable Federal laws, your responses will be kept confidential and will not be disclosed in identifiable form to anyone other than employees or agents. By law, every ABC employee as well as every agent has taken an oath and is subject to a jail term of up to 5 years, a fine of up to \$250,000, or both if he or she discloses ANY identifiable information about you.



Privacy and Confidentiality

- How well do respondents understand confidentiality pledges and risks of disclosure?
 - How can we communicate key points effectively?
 - What effect does this have on participation?
- Implications for changes to guidance, regulations...even laws???



Willingness to Participate in Surveys

“The majority of survey organizations reported increasing difficulties in conducting surveys in recent years. Response rates have declined or have been maintained only by increased effort and higher unit costs....A number of reasons were cited for the reported increasing difficulties in securing response. Among them were changing life-styles that make access to designated respondents increasingly difficult; the proliferation of survey-like activities (e.g., sales solicitations posing as surveys); skepticism about the purpose, validity, or usefulness of surveys; and inadequacy of surveying techniques to deal with current conditions. The relative importance of invasion of privacy and doubts about the confidential handling of data as causes for nonresponse...were often₁₄ mentioned as factors in both degree and accuracy of response.”



Willingness to Participate in Surveys

- Key issue affecting Federal, academic, and commercial social science and economic research
- Importance of theory
 - Guide design decisions, persuade managers/sponsors
 - For example: incentives
 - Guide collection of paradata and auxiliary data to inform bias analysis and adjustment



Willingness to Participate in Surveys

- Some Thoughts and Suggestions
 - Limitations of vignettes for capturing the decision “process”
 - Sample members likely have to make/remake their decision several times
 - Shifting costs and benefits over the field period
 - Initial benefits of passivity or avoidance
 - Rising costs of refusing or not participating
 - Tailoring of follow-up contacts to address perceived benefits and costs.



Willingness to Participate in Surveys

- Limitations of respondent's ability to tell you what they would actually do or why they did what they did
 - Need for theory-guided experimental research on actual behavior



Conclusions

- Declining response rates are likely not going away.
 - Neither are concerns about bias and rising costs
- Better theoretical understanding of people's willingness to participate in surveys is key to adapting our methods and assessing the implications for bias.



OMB Summer Internship

- Interested in learning more about OMB's role in the Federal statistical system?
- Statistical and Science Policy Branch expects that we may be able to fill one summer intern position and would welcome applicants from students in Master's or Ph.D. level survey methods programs
- Interns must be U.S. citizens.
- Contact me at:
 - bharrisk@omb.eop.gov or 202-395-7314
- Deadline is March 26th,





- Fill out your Census form and mail it back!



IT'S IN OUR HANDS