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REPORT BY THE
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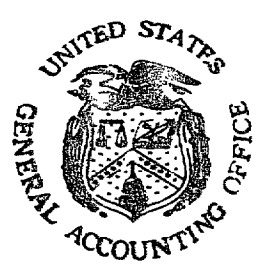
**Better Guidance And Controls
Are Needed To Improve Federal
Surveys Of Attitudes And Opinions**

Federal agencies need (1) more explicit guidance as to what constitutes a "good" attitude survey or opinion poll, (2) an improved monitoring system to assure compliance with existing standards, and (3) to discourage the use of public opinion polls and attitude surveys which contain extensive technical flaws.

This report highlights the problems that occurred in five Federal opinion polls and discusses the use of attitude surveys and opinion polls at six Federal agencies.

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GGD-78-24
SEPTEMBER 15, 1978



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-181254

The Honorable John D. Dingell
Chairman, Subcommittee on Energy
and Power
Committee on Interstate and
Foreign Commerce
House of Representatives

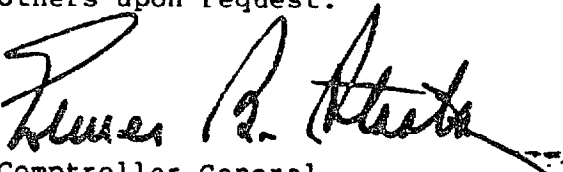
The Honorable John E. Moss
Chairman, Subcommittee on Oversight
and Investigations
Committee on Interstate and Foreign
Commerce
House of Representatives

The Honorable James L. Oberstar
House of Representatives

In response to your April 1, 1976, letter, this report discusses the potential for incorrect or unreliable information being generated by public opinion polls and attitude surveys sponsored or conducted by Federal agencies. The use of incorrect or unreliable information, as the basis for making Federal management decisions, can affect national programs and policies.

We believe that Federal agencies' guidance and review of the statistical procedures are insufficient in conducting public opinion polls and attitude surveys. We are therefore recommending that the Secretary of Commerce provide more guidance and establish systematic procedures for early review, monitoring, and postreview of public opinion polls and surveys.

As arranged with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from the date of the report. At that time we will send copies to interested parties and make copies available to others upon request.


Comptroller General
of the United States

REPORT BY THE
COMPTROLLER GENERAL
OF THE UNITED STATES

BETTER GUIDANCE AND
CONTROLS ARE NEEDED
TO IMPROVE FEDERAL
SURVEYS OF ATTITUDES
AND OPINIONS

D I G E S T

Federal agencies use attitude surveys and public opinion polls to collect data on the attitudes and opinions of the American public. However, many agencies lack the professional expertise needed to properly perform or review these surveys and polls.

GAO identified 209 public opinion polls or attitude surveys at six agencies and reviewed 5 surveys in detail. Although GAO did not find indications that survey results were intentionally misused, use of the results of all five should have been limited because each contained serious technical flaws. For example:

- An opinion poll relating to the landing of the Concorde aircraft at Dulles International Airport used a sampling procedure which, GAO believes, may invalidate the results. (See p. 26.)
- A survey concerning occupant satisfaction with factory built housing ignored the impact of rent subsidies on satisfaction. Subsidies, which affect the cost of housing, are an essential component in measuring occupant housing satisfaction. (See p. 23.)
- A survey to provide an information base for use in a model that compared potential national carpool incentive policies could not be used for national projections because of the type of sampling used and the extremely low response rate. (See p. 29.)

The American Statistical Association found similar problems with survey methodology and reporting of results. Its study reported that 15 of 26 Federal surveys reviewed had design or implementation problems severe enough to

prevent the survey from accomplishing intended objectives. The study also noted that conclusions and inferences in 10 of the surveys were not substantiated by the survey data. (See pp. 8 and 18.)

GAO found that the guidance being provided Federal agencies by the Office of Federal Statistical Policy and Standards for opinion polls and attitude surveys was not adequate because it was not specific enough to be of much value to those inexperienced in sample survey design. The Office does not provide sufficient guidance on the problems to look for when conducting a poll or survey and does not suggest methods for overcoming or avoiding problems which may occur. (See p. 8.)

Because contractors perform most polls and surveys (see p. 7), agencies need guidance in preparing requests for proposals and in evaluating contractors' proposals for surveys. Although the Office of Federal Statistical Policy and Standards, Department of Commerce, has recommended such guidance, it is not available.

The agencies reviewed submitted their survey questionnaires and plans for data collection to the Office of Management and Budget or to GAO for review and clearance, as the Federal Reports Act requires. However, clearance reviews often occur after considerable resources have been expended on survey design and questionnaire development and in some cases after a contract for the survey has been awarded. After a lot of time and effort has gone into a project, there is a tendency to resist suggested changes. In addition, making major changes to completed plans can be costly and time consuming. (See p. 14.)

The forms review system which the Office of Management and Budget and GAO use to control data collections--the only independent review of agencies' data collection efforts--is not adequate for assuring that attitude surveys and opinion polls result in reliable data and substantiated conclusions.

To effectively impact on survey design and development, the Office of Federal Statistical Policy and Standards should be involved in the project before large amounts of resources and staff time are expended. Although the Office recognizes the need for early review, nothing has been done.

The clearance review of attitude surveys and public opinion polls concentrates on the survey questionnaire and plan for data collection. There is no independent followup on implementing the plan or on reporting survey results. (See p. 16.)

Improper implementation of good survey designs and the reporting of unsubstantiated survey results could be reduced by extending the Office's review, on a selective basis, beyond the planning stage to include survey implementation and reporting.

The statutory authority and responsibility for developing programs and standards for improved statistical information gathered by Federal agencies, including the independent regulatory agencies, rests with the Secretary of Commerce. Under the Federal Reports Act, GAO can, in the process of clearing forms, determine that an independent regulatory agency's failure to adhere to statistical standards would result in an undue burden on respondents.

RECOMMENDATIONS

The Secretary of Commerce should direct the Office of Federal Statistical Policy and Standards to:

- Amend the "Standards for Statistical Surveys" to (1) provide more guidance on the potential problems that can occur and ways to overcome or avoid these problems and (2) include guidance on contracting for statistical surveys. (See p. 11.)
- Develop criteria to determine which surveys and polls require early review and establish a system for providing that early review. (See p. 16.)

--Develop criteria for selecting attitude surveys and public opinion polls that should be monitored or reviewed during implementation and establish a system for providing that review. (See p. 19.)

--Institute a program of postreview of selected attitude surveys and opinion polls to assure that inferences and conclusions reported as survey results are substantiated by the survey data, and make provisions for systematic reporting of these postreviews. (See p. 19.)

The Office's efforts to improve statistical procedures at independent regulatory agencies are especially important because of the reduced visibility of the survey and polling weaknesses at these agencies. As discussed in the report (see p. 3), OMB submits to the Office the proposed surveys and polls of the executive agencies enabling identification of recurring or pervasive problems. GAO also, in the course of performing its reports clearance functions, evaluates the appropriateness of statistical methods used in individual surveys and samples in light of the burden placed on respondents. However, practical considerations, such as the short period permitted for completion of clearance, preclude the comprehensive and continuing reviews that can be made by the Office. This makes it imperative that the Office make a special effort to include surveys and polls of regulatory agencies in its procedures for identifying recurring or pervasive problems.

AGENCY COMMENTS

Generally the agencies agreed with GAO's recommendations. However, there was concern as to the appropriate agency to conduct and monitor reviews. Two of the agencies stated that early review, monitoring and postreview of attitude surveys should be the function of the agency conducting the survey. One agency added that such functions could be approved by the Office of Federal Statistical Policy and Standards and subject to external audit.

GAO agrees that selected agencies could perform these functions if they had the necessary skills and knowledge and conducted enough surveys to justify acquiring such skills and knowledge. In addition, these functions should be subject to approval by the Office of Federal Statistical Policy and Standards and to external audit. This approach is consistent with GAO's recommendations.

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ABBREVIATIONS

ASA	American Statistical Association
FEA	Federal Energy Administration
GAO	General Accounting Office
OFSPS	Office of Federal Statistical Policy and Standards
OMB	Office of Management and Budget

CHAPTER 1

INTRODUCTION

In response to a request by the Chairman of the Subcommittee on Energy and Power and the Subcommittee on Oversight and Investigations of the House Committee on Interstate and Foreign Commerce and Congressman James L. Oberstar, we reviewed the extent to which Federal agencies use attitude surveys and public opinion polls. 1/

Attitude surveys and public opinion polls are used to obtain data, by means of interviews or questionnaires, from scientifically selected members of a specified universe. In surveys and polls, researchers obtain answers to questions from selected members--a sample--and then tabulate and analyze these answers to draw conclusions about the specified universe. The sample is usually chosen using statistical techniques to assure that it depicts the universe about which information is desired.

LEGISLATIVE CONTROLS OVER ATTITUDE SURVEYS AND PUBLIC OPINION POLLS

As information collection activities, opinion polls and attitude surveys are subject to the forms clearance provisions of the Federal Reports Act (44 U.S.C. 3501-3512). As statistical surveys, they are subject to the standards and guidelines promulgated by the Department of Commerce's Office of Federal Statistical Policy and Standards (OFSPS), under the Budget and Accounting Procedures Act of 1950 (31 U.S.C. 18b).

The Federal Reports Act

The Federal Reports Act of 1942 prohibited agencies from collecting data from the public without the Office of Management and Budget's (OMB's) prior approval. OMB has established forms review and clearance procedures to fulfill its approval responsibility. In November 1973, section 409

1/Attitude surveys and public opinion polls obtain attitude and opinion data as opposed to behavioral data. For example, "Do you think smoking should be allowed in public places?" is an attitude question and "Do you smoke in public places?" is a behavioral question.

of Public Law 93-153 amended the Federal Reports Act and assigned GAO the approval function over information collection by independent Federal regulatory agencies. ^{1/} GAO conducts advance reviews of new information collection plans and forms proposed by independent Federal regulatory agencies and audits their information gathering practices.

The Budget and Accounting Procedures Act

The Budget and Accounting Procedures Act directs the President to develop programs and issue regulations and orders for the improved gathering, compiling, analyzing, publishing, and disseminating of statistical information. OMB Circular A-46, "Standards and Guidelines for Federal Statistics," which includes "Standards for Statistical Surveys," applies to public opinion polls and attitude surveys. This function was part of OMB's responsibilities until it was transferred to the newly established OFSPS in October 1977. As a result of this transfer, the OMB Circular will be rescinded and the Department of Commerce will reimplement it in its "Statistical Policy Handbook."

THE FORMS CLEARANCE PROCESS

Both OMB and GAO have established forms clearance procedures to fulfill their respective responsibilities for providing advance review and clearance of forms and data collection plans. Each agency's procedures,

^{1/}The act does not define independent regulatory agencies. However, as of January 1, 1978, the following agencies were subject to GAO clearance: the Civil Aeronautics Board; Commodities Futures Trading Commission; Consumer Product Safety Commission; Equal Employment Opportunity Commission; Federal Communications Commission; Federal Election Commission; Federal Maritime Commission; Federal Trade Commission; Interstate Commerce Commission; National Labor Relations Board; Nuclear Regulatory Commission; Office of Surface Mining, Reclamation, and Enforcement, Department of the Interior; and the Securities and Exchange Commission.

At the time of our review, the Federal Energy Administration (FEA) was an independent regulatory agency for purposes of the act. However, Public Law 95-91, which became effective on October 1, 1977, transferred FEA's functions to the newly created Department of Energy over which OMB generally has clearance jurisdiction.

while similar, differ in authority and responsibility under the Federal Reports Act. In addition, the forms clearance process is the primary means of monitoring compliance of statistical data collections with Circular A-46 and the only independent review of proposed opinion polls or attitude surveys outside of the sponsoring agency.

OMB is responsible for assuring that (1) the burden and cost of data collections are minimized, (2) unnecessary duplicate data collections are eliminated, (3) the information is collected and tabulated so as to maximize usefulness to the collecting agency as well as to other Federal agencies and the public, and (4) the agency needs the data to properly perform its function.

OMB's clearance officer reviews the need for the information, the burden imposed on respondents, and whether the data collection represents unnecessary duplication. Until the functions were transferred to OFSPS, OMB's Statistical Policy Division reviewed the technical adequacy of the survey design and the ability of respondents to provide the information. OMB issued new guidelines on February 17, 1978, to reduce the burden of public reporting to Federal agencies. In these new guidelines OFSPS is responsible for the substantive review of statistical surveys.

In its clearance process, GAO reviews the proposed collection of information to see if (1) the burden on respondents is minimized consistent with the substantive needs of the agency, (2) the information could be obtained elsewhere within the Federal Government, and (3) the proposed collection is otherwise consistent with the Federal Reports Act. The agency, not GAO, determines its substantive need for information. Under the Federal Reports Act, GAO can, in the process of clearing forms, determine that an independent regulatory agency's failure to adhere to statistical standards would result in an undue burden on respondents. While OMB has no time limit, GAO must respond to the agency within 45 days or the agency can proceed with the data collection without GAO approval.

SCOPE OF REVIEW

We made our review at six Federal agencies--the Departments of Commerce (except the Bureau of the Census), Defense (Office of the Secretary of Defense--Manpower and Reserve Affairs), Transportation, the Interior, and State, and the FEA. We identified polls and surveys conducted by these agencies and examined five surveys in detail to

identify the procedures the agencies followed. 1/ We did not find any indications that the surveys were intentionally misused; however, we found technical problems in all five which could result in agencies using improper data.

In this report, we define an attitude or opinion survey as the collection of data, through the use of a questionnaire, where either five or more questions or at least 5 percent of all questions requested nonfactual responses from persons other than Federal employees. Although surveys can be, and often are projects involving the use of more than one questionnaire, in this report the terms "survey" and "poll" are to be considered synonymous with a questionnaire. The Departments of Defense and Transportation commented that our conclusions and recommendations could apply to nonopinion surveys as well.

The five surveys were selected based upon the availability of records and personnel, the significance of cost and sample size, the breadth of interest in the topic (that is, whether it appeared to be more than local interest), and whether results had been or were to be made public. These surveys were not chosen to represent all the polls we identified. They were chosen as case studies and illustrate the problems which can occur. The results cannot be scientifically projected to all of the surveys we identified.

We identified 209 opinion and attitude surveys (see app. III) at five Federal agencies as shown in the following table. Because of incomplete records we were unable to identify all surveys conducted by these agencies from 1970 through 1976--the period covered by our review. In addition, we did not identify any surveys conducted by the Department of State during this period.

Appendix IV describes procedures followed in conducting and sponsoring attitude surveys and opinion polls at each of the agencies we reviewed.

1/Ch. 4 contains detailed information on the surveys selected for review.

Public Opinion Polls and Surveys
Sponsored or Conducted by Five Agencies

<u>Year</u> <u>(note a)</u>	<u>Com-</u> <u>merce</u>	<u>Defense</u>	<u>Trans-</u> <u>portation</u>	<u>Interior</u>	<u>FEA</u>	<u>Total</u>
1970	1	-	6	1	-	8
1971	2	2	-	1	-	5
1972	4	3	6	3	-	16
1973	8	7	5	1	-	21
1974	5	14	13	8	2	42
1975	12	10	13	17	4	56
1976	12	7	4	15	-	38
Post 1976	b/ 9	2	7	5	-	23
Total	<u>53</u>	<u>45</u>	<u>54</u>	<u>51</u>	<u>6</u>	<u>209</u>

a/Represents the year in which OMB's approval of the survey document expired. When the expiration of approval date could not be determined, we used the year the contract was awarded. Forms are approved for 1 to 5 years. As a result, forms for some of the surveys will expire after our review period.

b/Includes one survey for which we could not determine the expiration of approval date nor the award of contract date.

The individual polls examined in detail were:

1. Department of Commerce--three opinion polls used to obtain attitudes towards industrialized housing which were part of a series of evaluations entitled "Project Feedback." Industrialized housing is factory produced housing.
2. Department of Transportation--an opinion poll entitled "Concorde Community Response" used to obtain local community attitudes towards the landing of the Concorde airplane at Dulles International Airport.
3. FEA--an opinion poll entitled "A Marketing Approach to Carpool Demand Analysis" used to obtain attitude data for input to a marketing model for determining the potential effects of various carpooling incentive policies.

We also looked at related studies by other interested parties and interviewed representatives of the opinion polling industry. Appendix II is a letter to Representative John E. Moss dated February 28, 1975, discussing FEA's possible violations of 5 U.S.C. 3107. This letter responds to question number 7 in the letter requesting our review.

Six Federal agencies were asked to comment on our report--the Departments of Commerce, Defense, Energy, the Interior, State, and Transportation. The Departments of Energy and State chose not to comment on our conclusions and recommendations, while the Department of Defense informally commented on the report. Appendixes V through IX contain the formal agency comments.

CHAPTER 2

MORE GUIDANCE NEEDED FOR FEDERAL AGENCIES

SURVEYING PUBLIC ATTITUDES AND OPINIONS

The "Standards for Statistical Surveys" does not provide adequate guidance for Federal agencies that survey public attitudes and opinions. The guidance does not consider the fact that Federal agencies use contractors extensively to perform surveys and polls and need guidance in contracting for surveys and in evaluating proposals submitted by contractors. In addition, the guidance is too general to be of value to people not experienced in conducting opinion polls or attitude surveys.

SOME FEDERAL AGENCIES LACK SURVEY EXPERTISE

Most of the 209 attitude surveys and public opinion polls were performed by contractors. This was especially true of the larger projects. Based on available data, contractors performed all surveys costing over \$50,000.

Polls and Surveys Performed
by Contractors and Agencies

<u>Estimated cost</u>	<u>Performed by contractor</u>	<u>Performed by agency</u>	<u>Unknown (note a)</u>	<u>Total</u>
\$0 - \$10,000	33	31	1	65
\$10,001 - \$50,000	53	10	-	63
\$50,001 - \$100,000	23	-	1	24
over \$100,000	30	-	-	30
Unknown	<u>14</u>	<u>9</u>	<u>4</u>	<u>27</u>
Total	<u>153</u>	<u>50</u>	<u>6</u>	<u>209</u>

a/In some cases we were able to identify opinion poll questionnaires but could not determine who had performed the survey because records had been lost or destroyed.

Of the 50 projects performed by agencies, 21 were done by Commerce and 18 by the Interior.

Four of the five agencies that used contractors to perform opinion polls and attitude surveys justified it based on their inability to perform certain surveys or polls or

their lack of staff to perform large surveys. The fifth, Commerce, requires its various components to obtain assistance with surveys from the survey research staff at the Bureau of the Census.

The project manager for the survey of local community response to the Concorde said that the survey could not have been done by the agency because it lacked the necessary expertise and staff. Federal Energy Administration staff members said that their agency does not perform any surveys because it also lacks the necessary staff and expertise.

Federal agencies' lack of statistical and survey expertise was also discussed at a series of workshops conducted by the Value/Burden Study Group of the Commission on Federal Paperwork. These workshops were devoted to problems with Federal surveys conducted by contractors. Representatives of 12 contractors, who perform surveys for Federal agencies, and personnel from agencies that sponsor surveys, exchanged ideas on the problems. Both groups agreed that many agencies lack the expertise to effectively sponsor or monitor surveys. According to contractor personnel, agencies' lack of experience and training in surveys often make it difficult for them to prepare good survey specifications in the request for proposal and to properly monitor ongoing surveys. Agency personnel pointed out that agencies without statistical or survey expertise do not know where to go for assistance.

A study ^{1/} of survey practices, conducted by the American Statistical Association (ASA) found that a lack of statistical and survey expertise was a major problem for many Federal agencies. The study covered 26 Federal surveys and found 15 with flaws serious enough to prevent the surveys from achieving their objectives. Four surveys with inadequate designs were sponsored by agencies which lacked prior experience in conducting or sponsoring surveys.

OFSPS' GUIDANCE NEEDS TO BE STRENGTHENED

Because agencies lack survey expertise, they need guidance and standards to make them aware of the potential

^{1/}"Development of Survey Methods to Assess Survey Practices, A Report of the American Statistical Association Pilot Project on the Assessment of Survey Practices and Data Quality in Surveys of Human Populations" by Barbara A. Bailar and C. Michael Lanphier, National Science Foundation Grant No. SOC 74-22902, 1977.

problems with surveys and how these problems can be avoided or overcome. OMB Circular A-46 lacks sufficient guidance on ways to overcome potential survey problems.

Although Circular A-46 cautions survey sponsors to be ready to justify significant departures from the standards, the standards are very general and offer minimal guidance. For example, the section of the Circular entitled, "Plans for processing and tabulating the data" states that "the basic design of the survey plan should provide procedures (including quality control) for editing, coding, and tabulating the data." The Circular does not state what would constitute appropriate quality control procedures. One of the surveys reviewed in detail, "Concorde Community Response," was almost completely lacking in quality control procedures. Inconsistencies in applying quality control procedures were also reported in the ASA study.

Circular A-46 states that errors in data which can be introduced by factors other than the sampling process (nonsampling errors) should be considered and should influence the selection of the data collection method (that is, mail, telephone, or personal interview). However, the Circular does not provide guidance as to the types of errors that might occur with each method nor does it suggest any specific steps to overcome errors. The Circular suggests "experience from past experiments and surveys should be reviewed in making these decisions."

The data collection method can affect the quality of the data. For example, telephone surveys may favor the inclusion of high income respondents, while mail surveys may require intensive followup to prevent a low response. With personal interviewing, lack of control over the interviewer is a concern. The ASA study reported

"* * * the choice of mode to use seems to reflect the guesses and prejudices of the survey project officer rather than firm evidence of the good and bad features of each mode."

Personal interviews and mail questionnaires were the primary data collection methods used for the attitude surveys and public opinion polls. However, none of the surveys reviewed in detail justified the collection method based on nonsampling error considerations.

Data Collection Methods Used for Attitude Surveys
and Public Opinion Polls Sponsored or Conducted
by Five Federal Agencies

<u>Department/ agency</u>	<u>Personal interview</u>	<u>Mail</u>	<u>Tele- phone</u>	<u>Other (note a)</u>	<u>Unknown (note b)</u>	<u>Total</u>
Commerce	12	20	1	16	4	53
Defense	18	16	2	6	3	45
Transporta- tion	25	17	1	9	2	54
Interior	22	18	2	7	2	51
FEA	<u>4</u>	<u>-</u>	<u>2</u>	<u>-</u>	<u>-</u>	<u>6</u>
Total	<u>81</u>	<u>71</u>	<u>8</u>	<u>38</u>	<u>11</u>	<u>209</u>

a/Includes use of mixed method, such as mail with personal interview followup for nonrespondents.

b/In some cases we were not able to determine the data collection method because of a lack of documentation.

In the Department of Transportation's survey of local community response to the Concorde, telephone interviewing was the data collection method chosen. However, the reason seemed to be the need for speed rather than a determination that this method would provide the best data. In that survey, no recognition was given to potential nonsampling errors which could introduce bias in telephone interviewing.

In the FEA-sponsored survey on carpooling, personal interviewing was selected as the data collection method. The use of visual aids, such as maps, necessitated the use of personal interviews; however, the interviewers were not sufficiently trained to handle the complex questionnaires. This was a potential source of nonsampling error.

The selection of telephone interviewing as the data collection method for one of the Department of Commerce

Project Feedback surveys--the exit survey--resulted in questionable data because over 20 percent of the people in the survey universe could not be reached by phone.

In addition to the lack of specificity, Circular A-46 fails to consider the agencies' extensive use of contractor-conducted opinion polls and attitude surveys. It only states that a trained statistician is necessary on the staff of contractors conducting federally sponsored sample surveys and when data processing is done under contract, the procedures to be followed must be clearly understood by both parties.

The need for guidance on contracting for statistical surveys has been recognized by OFSPS in its draft planning document "A Framework for Planning U.S. Federal Statistics 1978-1989." The draft states "Guidelines for contracting for statistical survey should be developed. These guidelines would be used by the agencies in issuing any request for proposal (RFP)."

CONCLUSIONS

A lack of survey expertise and experience was a major problem among some agencies. The present guidance provided in OMB Circular A-46 is too general to be of value to agencies not already experienced in conducting surveys. Therefore, agencies need more specific guidance to make them aware of potential survey problems and how these problems can be avoided or overcome. Contractors performed most polls and surveys. The reasons the agencies we reviewed gave for this extensive use of contractors were a lack of survey capability and a lack of staff to perform large surveys.

OFSPS has recognized the need for guidance on contracting for statistical surveys, although such guidance has not been developed. Because of the extent of contractor activity in statistical surveys, we believe development of contracting guidelines deserves a high priority in strengthening the Federal statistical policy.

RECOMMENDATION

We recommend that the Secretary of Commerce direct OFSPS to amend the "Standards for Statistical Surveys" to (1) provide more guidance on the potential problems that can occur and ways to overcome or avoid these problems, and (2) include guidance on contracting for statistical surveys.

AGENCY COMMENTS

The Departments of Commerce, Defense, and Transportation agreed with these conclusions and recommendations. The Department of the Interior suggested that a comprehensive manual or source book be developed describing in detail the procedures in attitude surveys and the threats to validity which are associated with each step. It should be available to potential users of survey data as well as Federal agencies sponsoring the research.

The guidance mentioned in our recommendation could be presented to both sponsors and consumers of opinion surveys.

The Department of Commerce pointed out that OFSPS' Committee on Statistical Methodology will soon issue a report on nonsampling errors and believes that this new report will be of considerable aid to the designers of surveys.

CHAPTER 3

A MORE COMPREHENSIVE REVIEW OF POLLS

AND SURVEYS IS NEEDED TO MAKE

SURE COLLECTED DATA IS ACCURATE AND RELIABLE

The clearance review and approval process, established to fulfill OMB's Federal Reports Act responsibilities, has been the primary method used to monitor compliance with statistical standards. However, this process neither assures compliance with statistical standards nor assures that collected data is accurate and reliable.

- The only review of opinion polls and attitude surveys, outside of that done by the sponsoring agency, occurs after survey design and planning is near completion and therefore approval may be acquiescence to a less than adequate plan to which significant resources have already been committed.
- The review does not assure the proper conduct of certain segments of the survey or poll (sample selection, data collection and processing, and data analysis and reporting) since it takes place before their implementation.
- Special attention should be given to the review, as discussed in this report of polls and surveys of independent Federal regulatory agencies, because of the amendment to the Federal Reports Act, which transferred clearance responsibility for these agencies to GAO.

INADEQUATE REVIEW OF INITIAL SURVEY PLANNING

Questionnaires used or sponsored by Federal agencies to obtain attitudes or opinions from the public must be reviewed and approved by OMB's clearance officer. In reviewing the proposed data collection, OMB looks at (1) the need for the information and determines whether the proposed data collection will satisfy that need, (2) the estimated cost of the data collection and the estimated burden imposed on respondents, and (3) whether the data collection represents unnecessary duplication. In addition, OFSPS reviews the technical adequacy of the survey design and the

ability of respondents to provide the information. The survey design includes the purpose of the survey; the definition of the target population or universe; the design of the questionnaire and clarity of the questions; and decisions relating to the sample selection method, data collection methods, followup procedures, data editing rules, data processing methods, summarizing or estimating from sample data, and pretesting. The OMB clearance review occurs after the sponsoring agency has approved the survey design and the questionnaire or data collection tool has been developed.

In each of the agencies we reviewed, the internal procedures called for review and approval of surveys at various levels within the agency and subsequent submission of clearance packages to OMB. In some agencies, such as the Interior, an extensive internal review is required (see p. 58), while the State Department requires only a minimal internal review (see p. 59). However, all agencies reviewed attempted to submit survey forms for clearance which were complete and ready for use. At this point the sponsoring agency, or in some cases the contractor, has committed significant resources to the project and expects to begin the survey. Requiring an agency to make a major change at this point may be difficult because of its resource commitment. Making major changes to completed plans could be costly and time consuming.

The problems of redoing basic survey design work was recognized by the Department of Commerce clearance officer on a Project Feedback opinion poll. The bureau performing the poll had not complied with internal requirements that groups within the Department of Commerce which perform or sponsor a statistical survey obtain Census Bureau assistance. The clearance officer approved the form because "it would not be practical to back up and start over." He did indicate, however, that the survey research staff at the Census Bureau could contribute significantly if contacted in the early planning stages of a survey.

The project director accepted OMB's recommended changes to the sample design and questionnaire of the Concorde Community Response survey without question and without review by the statisticians who had designed the sample and questionnaire because he felt he had no choice but to accept the changes. Disagreeing with the suggestions would simply delay clearance.

Two other surveys, which we did not review, were the subject of a paper by the contractor who performed the surveys. Delays caused by clearance of survey forms and additional costs related to changes necessitated by the clearance review had, in the contractor's opinion, little or no benefit. In the contractor's opinion, a review of the survey design and purpose was not appropriate at the late stage in the study. The contractor stated that reviewers frequently eliminate questions or make changes that result in poorer quality data being collected. However, he stated "since the time pressure for clearance is usually so critical the contractor does not object for fear the whole study schedule will be irreparably damaged."

The ASA study team found that the clearance process received many complaints from researchers because of delays in the process. In one instance an investigator insisted that the intervention (OMB recommended changes) came too late to be productive and consequently he refused to cooperate with the recommended changes.

OFSPS has recognized the value of early input to the design and development of a statistical survey. In its draft "A Framework for Planning U.S. Federal Statistics, 1978-1989" OFSPS recommended submitting clearance requests for surveys to OMB at an early stage. It said

"* * * the review of proposed statistical data collection efforts at an early stage could result in the identification of weaknesses at a time when they could be eliminated at minimum cost."

The early review could also lead to improved coordination, better methodologies, closer adherence to standards, and would expedite clearance by having most major issues resolved at the beginning of the project.

We agree with OFSPS' tentative recommendation. However, we do not agree with OFSPS' belief that early reviews should be performed especially for projects of major importance (projects with budgets over \$500,000). Many less costly surveys could benefit from an early review but would be missed if this dollar level were interpreted as a limitation, including most of the opinion polls and attitude surveys we identified. (See p. 7.) Other factors, such as sample size, planned uses of the data, and complexity of the survey design should be used in conjunction with the survey cost as criteria for surveys needing early review.

Conclusions

OFSPS should implement early review of statistical surveys. However, the criteria for surveys to be submitted for early review should consider more than just the cost of the poll or survey. Other factors which should be considered include sample size, planned uses of the data, and complexity of the survey design.

Recommendation

We recommend that the Secretary of Commerce direct OFSPS to develop criteria to determine which surveys and polls require early review and establish a system for providing early review.

Agency comments and our evaluation

The Departments of Commerce and Defense agreed with our recommendation for early review. Defense was concerned with the cost of implementing a system for reviewing all surveys and polls, and is planning to institute an internal review procedure which would include all surveys. It also suggested that OFSPS could audit and approve procedures in place of a review of individual surveys. In our opinion, a system of internal agency review which OFSPS could audit and approve would be consistent with our recommendation.

The Departments of the Interior and Transportation disagreed with our recommendation because, in their opinion, another level of review would not be beneficial. We believe the ineffectiveness of the present review system is partly due to its timing in the approval process. An earlier review could solve problems and reduce the delays that the Interior and Transportation are concerned about in the present process. Commerce, in its framework document, agrees that earlier review should reduce delays. (See p. 15.)

INADEQUATE REVIEW OF THE IMPLEMENTATION OF SURVEY PLANS AND SURVEY REPORTING

The present clearance review concentrates on the questionnaire and the sample survey design. Monitoring the implementation of the survey is left to the agency. In addition, there is no review to see whether the conclusions can be substantiated by the data collected.

We found technical flaws in the implementation or reporting of results for all five surveys reviewed in detail. These flaws for the most part could not have been detected

from a review of the survey plan or design. For example, the survey of airplane noise and the landing of the Concorde at Dulles Airport was approved with a proposed random sample of 2,000 respondents from the area around the airport and in the flight path of the Concorde. However, the original sample plan did not include Fairfax City, Virginia. Since plans for subsequent surveys included Fairfax City, and the Federal Aviation Administration wanted to compare surveys, the project director and the contractor performing the survey added respondents from Fairfax City so that the surveys would be comparable. They did not, however, keep track of how many respondents were added. As a result, it could not be determined if the sample was a random sample as called for in the plan.

In addition, no quality control procedures were maintained to prevent interviewers from unintentionally biasing the survey results and only limited verification of survey results was made to assure that the reported telephone interviews were actually made. Most importantly, the survey's conclusions were not substantiated by the data collected. The final report stated that a certain number of persons approved of a test period for the Concorde. However, survey questions failed to distinguish between the test period, limited operations, unlimited operations, and the Concorde airplane itself. As a result, the respondents may not have been aware that the question being asked was for their opinion of the test period.

The three Project Feedback surveys performed by Commerce also contained technical flaws which made survey results in each case questionable. In one survey, the site visitor survey, the plan called for a sample of prospective buyers or renters. However, three-fourths of the respondents were not interested in buying or renting. In another survey, the exit survey, over 20 percent of the universe was excluded from the possibility of selection in the sample.

In the occupant survey, the analysis of the data resulted in conclusions that could not be substantiated by the data collected. One purpose of the analysis was to compare the opinions of residents of industrialized housing with opinions of residents of conventional housing. The conclusion was that occupants of industrialized housing were as satisfied with their homes as occupants of conventional housing. The survey, however, never considered the existence of rent subsidies to the occupants of the industrialized housing. While the conclusion spoke of satisfaction with the housing, the expressions of satisfaction may have referred to the subsidized cost of the housing.

The ASA study listed four surveys in which a probability sample was specified but never implemented and noted that verification of coding and editing of data--commonly accepted quality control procedures for surveys--were not routinely performed. The ASA study also concluded that "incorrect causal inferences were often made." Of the 15 surveys the study team concluded had not achieved their objectives, 10 suffered from "incorrect causal inferences."

During the Commission on Federal Paperwork workshops on surveys, both contractor and agency personnel addressed the lack of review of survey implementation. Contractor personnel stated that the clearance process was inadequate because it concentrated on the survey questionnaire and reviewed nothing else. Agency personnel said that a review committee should be responsible for seeing that survey designs are implemented.

OFSPS has included a recommendation in its draft of "A Framework For Planning U.S. Federal Statistics 1978-1989" that Circular A-46 should be expanded to include evaluation of survey data because:

--Data users need to assess the quality of statistical data to effectively use it.

--Data producers need to assess the quality of statistical data to improve it through changes in methodology.

We agree that standards for evaluation of statistical data are desirable. However, to be effective, compliance with the standards would have to be monitored.

A monitoring system is needed to assess the adequacy of the surveys' implementations and the validity of the surveys' conclusions. However, required monitoring of all surveys could be a monumental and often a fruitless task. Therefore, criteria should be developed to identify those surveys in need of such monitoring. Such criteria should be based on the same factors suggested for determining which surveys should be subject to early review.

Conclusions

The forms clearance system cannot assure that Federal attitude surveys and public opinion polls will provide valid data and conclusions substantiated by that data because clearance occurs before the survey plan is implemented.

Therefore, a system is needed to review or monitor survey implementation. Although we recognize that monitoring the implementation of all federally sponsored or conducted surveys would be difficult, a system to monitor or review the implementation of the more significant surveys is needed. In addition, criteria should be established for selecting surveys to be reviewed. Such criteria should be based on the same factors suggested for determining which surveys should be subject to an early review.

We also believe a system of postreview is needed to make sure that inferences made from analysis of data and conclusions presented in survey reports are substantiated by the data collected in the survey. The OFSPS recommendation to establish standards for evaluation of statistical data should be implemented and could serve as criteria against which to judge reported survey results. However, a system to selectively review how well agencies are complying with those standards is needed.

Recommendations

We recommend that the Secretary of Commerce direct OFSPS to develop criteria for selecting attitude surveys and public opinion polls that should be monitored or reviewed during implementation and establish a system for providing that review.

We further recommend that the Secretary of Commerce direct OFSPS to institute a program of postreview of selected attitude surveys and opinion polls to assure that inferences and conclusions reported as survey results are substantiated by the survey data, and make provisions for systematic reporting of these postreviews.

Agency comments and our evaluation

The Department of Commerce agreed with this recommendation and stated that it would seek ways to further develop criteria and systems to (1) monitor surveys during implementation and (2) institute postreview of selected surveys.

The Department of the Interior agreed with our finding (see p. 7) that many agencies do not have the requisite skills or staffing to conduct, and in some cases even monitor, attitude surveys. However, the Interior stated that having OFSPS monitor and postreview selected surveys would be more cumbersome and self-defeating than the current

process. It suggested that each agency acquire the necessary skills and knowledge to carry out the monitoring and postreview functions. The Department of Defense suggested that a monitoring and postreview function could be part of an internal review process which could be approved by OFSPS and subject to external audit. The Department of Transportation said that a monitoring effort would interfere with the day-to-day management of surveys.

The Department of the Interior further suggested that a monitoring and postreview function, such as the one recommended, be accomplished through an interagency board of social scientists and statisticians with known survey experience.

We believe that it is consistent with our recommendations for individual agencies to establish internal monitoring and postreview functions for attitude surveys if (1) they have the necessary skills and knowledge, (2) the survey volume is sufficient to justify such internal functions, and (3) the functions are subject to OFSPS approval and external audit.

We disagree with Transportation's concern that such a monitoring function would constitute interference. In our opinion, it is not the responsibility of a monitoring group to interfere with the day-to-day work of a functioning entity. To the contrary, such a group is only to observe and report on the day-to-day work of the group for purposes of critiquing such work and making recommendations for changes where necessary.

We do not believe an interagency board of social scientists and statisticians, as suggested by the Interior, could be effective because such a board would serve on an ad hoc basis. We believe an "in place" organization responsible for monitoring surveys on a full-time basis is needed to be effective. An ad hoc board would only be able to consider a few major surveys.

The Department of Transportation was the only agency responding to our report that directly disagreed with our recommendation for a postreview of polls and surveys. Transportation was concerned that postreview and reporting of the postreview might constitute prior censorship. Because postreviews will usually occur after survey reports are completed, we do not agree that such reviews would constitute prior censorship.

SOME FEDERAL AGENCIES NOT
COVERED BY PRESENT REVIEW

An additional problem with attitude surveys and public opinion polls was created when the responsibility for the clearance of independent Federal regulatory agencies' forms was transferred from OMB to GAC. GAO's authority in forms clearance is limited to determining an agency's adherence to statistical standards in light of undue burden on respondents.

Our review included only one agency considered an independent Federal regulatory agency for purposes of the Federal Reports Act--FEA. At FEA, GAO cleared only two of the six attitude surveys or public opinion polls. The other four were exempted from GAO clearance because they were strictly personal or telephone interviews. GAO's regulations state

"* * * guides for personal visit or telephone or telegraph surveys are excluded from the definition, and therefore from clearance requirements, on the basis that such activities do not bear a meaningful relationship to the statutory purposes of GAO review and clearance."

The exemption, however, is being reviewed because of the findings presented in this report and the potential for the exemption's abuse. In addition, GAO has no authority to mandate changes to survey design or sampling plans unless they relate to the issues of burden or duplication.

We looked at one of the two FEA surveys GAO cleared. A review of its survey design and planned sampling techniques might have brought out the potential for a low response rate. The potential existed because of the type of sampling plan being used coupled with the fact that the contractor had made no special provisions to counter non-response problems. In addition, reviewing the survey design at an early stage would have revealed that the survey would not result in data which could be used to project the impact of proposed national carpooling policies--the stated purpose of the survey. That fact, while obvious from a review of the survey design, was not known to the FEA technical officer until the project was nearly complete.

According to the OFSPS Director, independent Federal regulatory agencies are subject to the standards of Circular A-46. In our opinion, the organization responsible for statistical standards should be the organization reviewing the

forms, as this review is the only system presently used to monitor compliance with statistical standards and good survey practices.

We have previously recommended that forms clearance for all Federal agencies be handled by one agency rather than split as is now the case. (See "Status of GAO Responsibilities Under the Federal Reports Act," May 28, 1976.) If this were done, the special problems of reviewing surveys conducted or sponsored by independent Federal regulatory agencies would be alleviated by the technical reviews conducted by OFSPS. However, if we retain the responsibility for clearing forms for independent Federal regulatory agencies, OFSPS' efforts to improve statistical procedures at independent regulatory agencies are especially important because of the reduced visibility of the survey and polling weaknesses at these agencies.

As discussed in the report (see p. 3), OMB submits to OFSPS the proposed surveys and polls of the executive agencies enabling identification of recurring or pervasive problems. GAO also, in the course of performing its reports clearance functions evaluates the appropriateness of statistical methods used in individual surveys and samples in light of the burden placed on respondents. However practical considerations, such as the short period permitted for completion of clearance, preclude the comprehensive and continuing reviews that can be made by OFSPS. This makes it imperative that OFSPS make a special effort to include surveys and polls of regulatory agencies in its procedures for identifying recurring or pervasive problems.

CHAPTER 4

TECHNICAL PROBLEMS IDENTIFIED IN

SELECTED POLLS AND SURVEYS

To obtain greater insight into the practices followed in attitude surveys and public opinion polls conducted or sponsored by Federal agencies, we selected five surveys as case studies:

- Department of Commerce--Three opinion polls--part of a series of evaluations called Project Feedback--used to obtain attitudes toward industrialized housing projects from (1) visitors to the projects, (2) residents leaving the projects, and (3) project occupants.
- Department of Transportation--An opinion survey entitled "Concorde Community Response" used to obtain local community attitudes toward the landing of the Concorde airplane at Dulles International Airport.
- Federal Energy Administration--An opinion poll entitled "A Marketing Approach to Carpool Demand Analysis" used to obtain attitude data for use with a marketing model to determine the potential effects of various national carpooling incentive policies.

PROJECT FEEDBACK'S CONCLUSIONS MAY BE MISLEADING

Project Feedback was a series of evaluation studies of Operation Breakthrough--a demonstration program initiated by the Department of Housing and Urban Development in 1969 to support the development of industrialized housing construction. The National Bureau of Standards sponsored or performed the evaluations under an agreement with the Department. Three of the evaluations were surveys of consumers' opinions.

1. A site visitor survey to obtain public reaction from visitors to Breakthrough housing sites.
2. An exit survey to evaluate whether residents leaving Breakthrough housing had been satisfied.
3. An occupant survey to obtain residents' opinions of Breakthrough housing and compare them to opinions

of conventional housing obtained from residents of comparable conventional housing projects.

The first two surveys were done primarily by the Bureau and the third was done primarily by a contractor. The Bureau was responsible for analysis of the data on all three surveys. Total cost for the three surveys was about \$465,000. A short summary of our findings for each of the surveys follows.

The site visitor survey was planned as a sample of prospective buyers or renters who visited Breakthrough housing sites and inspected model units. The plan called for an estimated 1,100 respondents per site. However, the largest number of responses obtained from any site was 406. Most of these responses were obtained during a highly publicized, free food and refreshments "gala." Also, the majority of respondents to the survey were not interested in buying or renting Breakthrough housing. Because of these problems, the results of this survey should be used with great caution. The Project Feedback director told us that no final report or extensive analysis of the results of the visitors survey will be prepared.

The exit survey was designed to evaluate the degree of satisfaction among persons moving out of Breakthrough housing. Telephone interviews were conducted with 60 of 78 move-outs between December 1, 1973, and March 1, 1974. The 18 move-outs not interviewed did not have a phone, had an unlisted number, or moved without leaving a forwarding address. The results of 13 of 21 questions asked in the survey were reported to the Department. The Bureau did not consider the remaining questions sufficiently important to code and include in the analysis.

A report showing the results of the analysis has been drafted and reviewed by Department officials. The report concludes that

"* * * 78.2 percent of the respondents were either somewhat or very much satisfied with their total Operation Breakthrough residential experience * * *. The remaining 21.8 percent were either somewhat or very much dissatisfied."

Although the report does speak of the results in terms of respondents, in our opinion the report should caution the reader that the results may not be representative of the total move-out group because of the exclusion of 18 (23 percent) of the move-outs.

The occupant survey was the largest of the three surveys and the primary tool for evaluating public reaction to Breakthrough housing. The survey consisted of a personal interview questionnaire to be administered to all occupants of Breakthrough housing and a comparison questionnaire administered to a selected sample of conventional households chosen to be as comparable as possible to the various Breakthrough sites. A total of 2,045 interviews were completed--1,483 with Breakthrough occupants and 562 with conventional housing occupants. The Bureau developed the questionnaire--consisting of 218 questions--while a private contractor conducted the interviews.

The conclusions from the survey were based on an analysis of only 11 (5 percent) of the 218 items covered in the occupant questionnaire. According to the project director the limited analysis was due to a lack of funds. In the analysis performed, respondents' answers were not given equal weights. Several of the questions were open ended allowing for as many answers as the respondent cared to make. For example, a respondent could list seven reasons for liking Breakthrough housing and two respondents could list two reasons each for disliking Breakthrough housing. The analysis would show seven favorable and four unfavorable responses rather than one favorable and two unfavorable respondents. In addition, no analysis was performed to determine if the differences in percentages of Breakthrough versus conventional housing occupants expressing satisfaction and dissatisfaction were statistically significant.

Many Breakthrough housing residents receive rent subsidies. This factor could influence the attitudes and opinions of these residents about Breakthrough housing. The Bureau of Standards recognized the impact of housing costs on the opinions of residents by reporting that cost was the most frequently cited reason for selecting a Breakthrough home and that low housing costs were associated with satisfaction while higher housing costs were associated with dissatisfaction, but did not include the impact of rent subsidies in the analysis of survey results. In a report to the Department of Housing and Urban Development, the Bureau qualified the conclusions on housing satisfaction:

"Thus it appears that the most satisfied groups are likely to be groups with low income, with low monthly housing costs receiving rent subsidies/supplements. If the subsidized are in fact the satisfied, it is not clear whether they are happy because of good housing or whether they are happy because of what they are getting for the money (relative cost)."

Rent subsidies were not considered in the survey or in the analysis of the survey results. The overall conclusion was that occupants of Breakthrough housing had opinions about their housing which were as favorable as the opinions that occupants of matched conventional housing had about their dwellings. The percentages of satisfied and dissatisfied Breakthrough respondents receiving rent subsidies were not included in the analysis. Because the existence of subsidies for persons living in Breakthrough housing was not considered, the overall conclusion may be misleading.

THE CONCORDE SURVEY--POORLY
CONDUCTED AND CONTROLLED

On February 4, 1976, the Secretary of Transportation authorized limited operation of the Concorde airplane at New York's John F. Kennedy Airport and Dulles International Airport near Washington, D.C., for a trial period of 16 months. The Federal Aviation Administration was to monitor Concorde operations during the test period. The monitoring was to provide input into the decision process which would determine whether the Concorde should be allowed to use U.S. airports permanently. As part of that monitoring effort, the Federal Aviation Administration planned to sponsor a series of attitude surveys to measure local community reaction to the decision and provide data for the decision on continued operations of the Concorde after the trial period. In addition, it planned to conduct a nationwide survey to obtain national opinion data on the Secretary's decision.

OMB reviewed the questionnaires and survey design for the entire project and as a result of OMB recommendations the Federal Aviation Administration dropped the idea of a nationwide survey and increased the sample size of the local surveys from 500 to 2,000. OMB statisticians did not consider 500 a large enough sample for the types of analyses planned. OMB also required several changes to the questionnaire--both adding and deleting questions.

The first survey was a telephone survey of residents in the Virginia and Maryland communities surrounding Dulles Airport and in the Concorde flight path. Its purpose was to provide data on local community attitudes and awareness of airplane noise prior to Concorde operations. By comparing results with the first survey, subsequent surveys in the Dulles area would determine changes in attitudes and awareness resulting from limited Concorde operations. Our assessment was confined to the first Dulles survey. A number of problems occurred:

- The sample was to be a random selection of 2,200 telephone numbers (2,000 plus 200 substitutes for nonrespondents) drawn from published telephone subscribers in the Dulles area. As a result, 15 to 18 percent of the population of the towns surrounding Dulles--persons without telephones or with unpublished telephone numbers--were not included in the group from which the sample was drawn.
- Residents of the City of Fairfax, Virginia, were excluded from the 2,200 sample drawn for the survey. The project director and contractor performing the survey added telephone numbers from the City of Fairfax to make the survey comparable to follow-on surveys. However, no records were kept of the number added and no one was able to provide us an acceptable estimate of the resulting sample size. The method used to select the additional numbers was the same as that used to select the original 2,200.
- The survey questionnaire may have contributed to unreliable results because:
 1. The questions dealing with public reaction to the Secretary's Concorde decision failed to distinguish between a test period for the Concorde, limited Concorde operations, unlimited Concorde operations, and the Concorde airplane itself. As a result, the respondent may not have been aware that the question being asked was for an opinion of limited operations for a 16-month test period.
 2. The structure of several questions allowed a wide latitude to the interviewer on how to pose the questions. If questions are posed differently they will elicit noncomparable responses.
 3. The questions dealing with attitudes towards neighborhoods, pollution, and aircraft noise were worded so that they may have introduced a negative bias.
 4. It did not guarantee confidentiality which could result in unreliable responses.
- The opening statement of the questionnaire introduced the topic of Concorde flights and may have affected opinions by highlighting the Concorde prior to asking questions about noise problems. Transportation offi-

ciala explained that the opening statement was required by OMB in the interest of informed consent of respondents. In subsequent surveys this requirement was removed. In addition, the survey was conducted during a period of extensive publicity about the upcoming Concorde flights, including a May 17, 1976, visit from the President of France by way of the Concorde. As a result, the survey may not have yielded good pre-Concorde flight data.

--Telephone interviews were conducted primarily by volunteers from a local women's club and two campuses of a local community college. Interviewers were not screened for potential bias and were given only one training session (about 2 hours) and a brief manual of instructions.

--There was very little quality control over the interviewing. Telephone calls were not made from a central location and there was no onsite supervision. In addition, only 10 percent of the respondents were called back to verify the interviews. The contractor's normal call-back ratio of 20 percent was not followed due to the time constraints. The contractor did edit the questionnaires for internal consistency.

--Interviewers completed 2,026 interviews in 4-1/2 to 5 days. However, the interviews were not equally distributed between noise impact areas as called for in the sample design. Moderately noise impacted and unimpacted areas were oversampled and highly and lightly impacted areas were undersampled. Within the unimpacted noise area, the community from which interviewers volunteered was oversampled--198 respondents rather than 84 as called for by the sampling plan. In our opinion, this may have been caused by the lack of supervision over who was being interviewed.

The many problems cited above make it very difficult to draw reliable conclusions from the data. The Department of Transportation admits that the Concorde survey was conducted on an expedited basis because of severe time limitations and recognizes the limitations in the survey and its reporting. However, it believes we overstated these limitations. We believe that the only conclusion which can be validly drawn from the survey data is the number of respondents who had prior information about the Secretary of

Transportation's decision concerning the Concorde. Any comparison of the results of the first Dulles survey with future surveys would be very difficult because it is not known exactly on what subject opinions were obtained.

INADEQUATE PLANNING AND DATA ANALYSIS
OCCURRED IN THE CARPOOL DEMAND SURVEY

A marketing approach to carpool demand analysis was one of a series of studies to identify ways of encouraging the public to make less use of private autos with only one occupant and more use of other transportation modes. The study included a survey designed to provide input data for a marketing model which would allow FEA to estimate (1) the number of commuters who would shift to carpooling for their trip to and from work under each individual or a combination of transportation modes under review, (2) the reduction in energy usage that would result, and (3) the reduction in air pollution caused by reduced auto emissions. FEA planned to use the estimates derived from the survey and subsequent analysis to formulate national policies and programs for encouraging carpooling. The cost of the study was about \$84,000.

In our opinion, the validity and reliability of the survey results are too limited to allow inferences to be drawn on geographic areas other than the three included in the study. Use of these survey results in deciding future carpool policies should be limited.

Although the survey was to provide data for estimating the impact of national policies, a random national sample was considered prohibitively expensive. Instead, a sample was drawn from three metropolitan areas chosen to represent the diversity of the Nation's urban areas and various factors conducive to carpool formation. Clusters of city blocks were randomly selected and a quota of five interviews per cluster was established.

While this sampling method reduced costs, it selected a household when the true unit of analysis was the commuter/worker resident of a household. Also, this type of selection process tends to heavily weight completed interviews with people who are typically at home and willing to talk. The characteristics of these people may be different from the people who are rarely at home or unwilling to talk. The sampling plan contained no provisions to counter a potentially high nonresponse. Only two call-backs were planned and no sampling of nonrespondents was planned.

Although most of the questions were not of a sensitive nature, some potentially sensitive areas were included such as age, income, number in household employed, and employer, and the survey questionnaire contained no guarantee of confidentiality. As noted by the contractor, the two-part survey questionnaire was very complex. In addition, it was estimated that an hour would be required to complete the interview portion.

In our opinion the lack of a confidentiality guarantee along with the questionnaire's complexity and length tended to reduce response rates as well as the validity and reliability of responses.

The survey's response rate was extremely low. Interview attempts were made at 6,543 households. Contact was made at 4,119, of which only 2,371 contained qualified respondents. Of these, 533 were not available, 936 refused to be interviewed, and 902 completed an interview.

Survey Response Experience

	<u>Number of households</u>				<u>Percent</u>
	<u>Chicago</u>	<u>Pittsburgh</u>	<u>Sacramento</u>	<u>Total</u>	
Interview attempts	<u>2,156</u>	<u>1,879</u>	<u>2,508</u>	<u>6,543</u>	
Results:					
No contact	833	603	988	2,424	37
Contact:	<u>1,323</u>	<u>1,276</u>	<u>1,520</u>	<u>4,119</u>	63
Non qualified	682	466	600	1,748	42
One or more qualified:	<u>641</u>	<u>810</u>	<u>920</u>	<u>2,371</u>	58
Respondent not available	71	203	259	533	22
Refused	269	307	360	936	40
Interview completed	301	300	301	902	38

Survey results were reported to FEA in four technical memorandums and one summary report. FEA distributed the summary report to the Federal Highway Administration, State and local carpool agencies, urban planners, and FEA regional offices.

The study did not investigate the implications of carpool policies on a national scale. The summary report recognizes this limitation but suggests that useful city comparisons could be made. The report notes:

"Although extensions of the results of the study to other cities cannot be made with complete confidence, the impact of carpool policies on other cities within the same major breakdown by size and transit service should be quite similar and usable."

The summary report also notes other survey limitations, such as the length and complexity of the questionnaire, but fails to mention the significantly low response rate.

Considering the low response rate, sampling of only three cities, length and complexity of the questionnaire, and weighting of responses with people typically at home, we believe the survey results are too limited to allow extensive interpretation or extension to other geographic areas--the primary purpose of the initial contract.

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CONGRESS OF THE UNITED STATES
HOUSE OF REPRESENTATIVES
COMMITTEE ON INTERSTATE AND FOREIGN COMMERCE
SUBCOMMITTEE ON ENERGY AND POWER
WASHINGTON, D.C. 20515

April 1, 1976

The Honorable Elmer B. Staats
Comptroller General
General Accounting Office
441 G Street
Washington, D. C. 20548

Dear Mr. Staats:

On March 18, representatives of the Federal Energy Administration testified before the Subcommittee on Energy and Power that the FEA has, by contract and otherwise, sponsored surveys and polling of public opinions and attitudes concerning energy policy matters.

We believe such surveys are beyond the scope of FEA's authority, under Section 5(b) (9) of the Federal Energy Administration Act of 1974 (P.L. 93-275; 15 U.S.C. 764), to "collect, evaluate, assemble, and analyze energy information on reserves, production, demand, and related economic data." Furthermore, the FEA witnesses testified that, so far as they were aware, FEA had not complied with the Federal Reports Act (44 U.S.C. 3501-3512) which requires FEA, before conducting surveys of 10 or more persons, to clear the survey questions with the Comptroller General.

I.

We request that you inform us about the extent, and the details thereof, of GAO's oversight and clearance of every survey or polling of public opinion, attitudes or views, or research thereon, conducted and/or financed by the FEA since its creation in 1974.

II.

We further request that you initiate a comprehensive, government-wide investigation of every survey or polling of public attitudes and opinions conducted, financed, or disseminated by each Federal agency since January 1, 1970. Such investigation should examine for each such survey or polling the following matters:

1. The purpose and nature of the survey or polling project.
2. The cost of the survey or polling.

APPENDIX I

APPENDIX I

The Honorable Elmer B. Staats

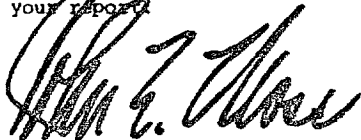
April 1, 1976

- 3. The legal authority (if any) under which the survey or polling was conducted, financed or disseminated.
- 4. The nature of the survey or polling questions.
- 5. (a) Were those questions and the project cleared by the Comptroller General, or the Director of the Office of Management and Budget, as required by the Federal Reports Act?

(b) If the answer to question 5(a) is no, why were they not cleared?
- 6. (a) Did the agency prepare the questions or project with the aid of, or clear them with, any representatives of the industry or industries regulated by the agency conducting or financing the survey or polling?

(b) If the answer to question 6(a) is yes, to what extent was that done and what were the names of (i) the industry representatives; and (ii) the companies or trade associations they represented?
- 7. Did the dissemination of the results of such survey or polling involve a violation of the Act of September 6, 1966 (80 Stat. 416; 5 U.S.C. 3107) which forbids the use of appropriated funds "to pay a publicity expert unless specifically appropriated for that purpose?"

It would be appreciated if your staff would contact Mr. Frank Potter or Mr. Phineas Indritz of the Subcommittee staff (225-1030) concerning any question your staff might have regarding this request. In conducting this investigation, your staff will, of course, need to confer with the various agencies. However, we request that your staff (a) not transmit a copy of your proposed report to the agencies for comment; and (b) keep our staff advised of the progress of your investigation; and (c) confer with our staff prior to the completion of your report.

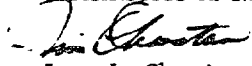


John E. Moss
Chairman
Subcommittee on Oversight
and Investigations

Sincerely,



John D. Dingell
Chairman
Subcommittee on Energy and Power



James L. Oberstar
Member of Congress

JDD:Ip1



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-181254

FEB 28 1975

The Honorable John W. Moss
House of Representatives

Dear Mr. Moss:

By letter of September 9, 1974, you requested that the General Accounting Office (GAO) make a study to determine if the Federal Energy Administration has been violating the provisions of 5 U.S.C. § 3107 (1970). That statutory provision, which had first been enacted as part of the Act of October 22, 1913, ch. 32, 38 Stat. 208, 212, provides as follows in its codified form:

"Appropriated funds may not be used to pay a publicity expert unless specifically appropriated for that purpose."

In none of the appropriation acts applicable to fiscal years 1974 and 1975 did we find any specific appropriation for "publicity experts" for any Government agency. The extent to which a separate delineation for publicity experts is provided in the budget submissions of the respective departments and agencies has not been determined, but a sample of the information contained in "The Budget of the United States, Fiscal Year 1975, Appendix" would indicate that it is not the general practice of the agencies to do so. In light of these facts some historical perspective might be helpful.

Our prior decisions concerning 5 U.S.C. § 3107 are not extensive, the bulk of them having arisen generally in the 1930's. At that time we had difficulty applying the statutory provision and so informed Members of Congress when inquiries were addressed to us. The difficulties we then experienced included the following:

1. The prohibition is against compensating any "publicity expert" but the statute contains no definition of a "publicity expert" or criteria for determining who is a "publicity expert." Those employed for or engaged in so-called publicity work were not appointed as publicity experts but under some other designation and, for the most part, did not purport to be experts.

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2. The employees engaged in so-called publicity work were assigned to their duties by their supervisors, and consequently it would have been harsh to withhold the compensation of the employees.
3. There were agencies whose regular duties or whose effective implementation of agency responsibilities required the acquisition and dissemination of information, even though no specific provision for personnel therefor may have been contained in the pertinent appropriation law.

Remedial legislation was proposed in 1943 in the form of H.R. 656, 78th Cong., entitled "A BILL Relating to legislative and budgetary control of expenditures for publicity activities of the executive branch of the Federal Government, and for other purposes." That bill did not pass but in commenting on it, we stated that we believed that it would be more effective in controlling expenditures for publicity purposes than the Act of October 22, 1913, the Act from which 5 U.S.C. § 3107 is derived. In making that comparison we reported:

"* * * The difficulty in enforcing the present law arises from the fact that those employed for publicity purposes are not usually officially designated as such but are given other designations and when the particular department or agency is questioned with respect thereto the head thereof invariably insists that the employee is not a publicity expert. Also, it cannot be said that every employee who prepares press releases or magazine articles is a publicity expert and this office has not felt warranted in withholding the compensation of an employee merely because part or all of his official duties may consist of preparing or disseminating information when neither his appointment nor the pay rolls describe him as a publicity expert." (Emphasis added.)

The purpose of the Congress in enacting 5 U.S.C. § 3107 was apparently to prohibit improper publicity activity within the agencies, that is, publicity work not specifically authorized by law. It may be that in some agencies of the Government employees may at times be assigned the duty of preparing or disseminating information for the purpose of reflecting credit upon an activity, or upon the officials charged with its administration, rather than for the purpose of furthering the work which the law has imposed upon it. In recent years, without apparent concern for 5 U.S.C. § 3107, Congress has included provisions in certain

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appropriation acts addressed specifically to publicity. Provisions specifically referring to publicity which are contained in various appropriation acts for fiscal years 1974 and 1975 are set forth in an enclosure herewith.

With particular reference to the Federal Energy Administration (FEA), subsection 14(a) of the Federal Energy Administration Act of 1974, Pub. L. No. 93-275, 88 Stat. 96, 108, places specific responsibilities on the agency to disseminate information to the public. It provides:

"The Administrator shall make public, on a continuing basis, any statistical and economic analyses, data, information, and whatever reports and summaries are necessary to keep the public fully and currently informed as to the nature, extent, and projected duration of shortages of energy supplies, the impact of such shortages, and the steps being taken to minimize such impacts."

Section 6 of the FEA Act of 1974, supra, transferred from the Department of the Interior to FEA the Office of Petroleum Allocation, the Office of Energy Conservation, the Office of Energy Data and Analysis and the Office of Oil and Gas and section 9 authorizes and directs the Director of the Office of Management and Budget to dispose of the "unexpended balances of appropriations, authorizations, allocations, and other funds held, used, arising from, available to, or to be made available in connection with functions which are transferred by * * * this Act, as the Director deems necessary and appropriate to accomplish the intent and purpose of this Act" (emphasis added). Thus, the moneys appropriated under the headings of "Fuel Allocation, Oil and Gas Programs" and "Energy Conservation and Analysis" in the Special Energy Research and Development Appropriation Act, 1975, Pub. L. No. 93-322, 88 Stat. 276, 278, are available for obligation and expenditure by the FEA. See S. Rep. No. 93-903, 2d Sess. 19, 20 (1974). Neither of these appropriation provisions nor any other provision in the Special Energy Research and Development Appropriation Act, 1975, contains a specific appropriation for publicity experts. We note, however, that H. Rep. No. 93-1010, 2d Sess. 20 (1974), states, in part:

"The purpose of the Office of Energy Conservation is to reduce energy demand growth as rapidly as possible under conditions of acceptable socio-economic impacts. Major functions include * * * developing motivational education programs on energy conservation for the American public and carrying out an aggressive [sic] multi-media public information and consumer awareness program; * * *."

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Moreover, although there is no specific breakdown of number of personnel engaged in publicity functions therein, the budget justification presented to the House and Senate Appropriations Committees on behalf of the Office of Energy Conservation stated, in part, as follows:

Organization

"The OEC is organized in three line divisions -- Voluntary and Mandatory Programs Policy Evaluation and Implementation; and Research, Development and Demonstration.

* * * *

Fiscal Year 1974 Program Objectives

* * * *

"The Division of Voluntary Programs has two branches: Public Education and Information, and State and Local Government Programs.

* * * *

Public Education and Information Branch - National advertising program (contract with the Advertising Council, Inc., Cunningham & Walsh advertising agency). All media campaign with emphasis on television and radio. Outstanding success during first few months of program (NFL championship games, Super Bowl, prime-time evening television).

"Preparation and mass mailings of materials on energy conservation, including Congressional, elected official and private sector correspondence requiring nonroutine action (fact sheets, booklets, backgrounders, speeches, Presidential messages, and FEO action papers).

"Special Projects: as per instructions (Executive Order, FEO Administrator) to work closely with Federal agencies to institute broad constituency EC programs. Examples include a Civil Service Commission Federal employee and agency EC awards program, including cash awards; HEW school and teacher programs; GSA driver awareness program; White House EC press conference, special briefings and seminars.

* * * *

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"Fiscal Year 1975 Program Objectives - Division of Voluntary Programs"

* * * * *

"Public Education and Information Branch - This Branch has as its principal focus the daily, intensive dissemination of information on energy and energy conservation to the private sector. Included in the education and information programs are advertising, printed and published materials, visuals, films, television and radio scripts and telops, fact sheets and special presentations for conferences, seminars, and the like.

"The nation's mass media will receive heavy attention in disseminating the program. Included will be an extensive speakers' placement program which will seek opportunities for OEC and FEO representatives to highlight the Administration's energy conservation and demand management programs.

"The Branch will conduct public opinion research on a continuing basis to assist in providing FEO with guidelines in making decisions regarding the impact of programs and proposed actions on the private sector.

"The fiscal year 1974 outreach program will be expanded, including the introduction of materials specifically requested by the Congress for mass distribution through mailings and distribution centers.

"The Branch will develop and offer new energy conservation communications to selected groups (the Congress, opinion leaders, elected officials, academia, Federal executives).

"The activity will seek vigorously to induce Federal agencies to develop constituency and contractor programs designed to further energy conservation progress in the nation. Examples (in fiscal year 1974) include the Civil Service Commission's Federal Awards Program, DOC's business and industry program and HEW's teacher and student EC kit program.

"The Branch will seek out new opportunities including joint venturing with other Federal agencies. (\$1 million in contract funds for the project)."

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Special Energy Research and Development Appropriation Bill for 1975, Hearings Before Subcommittee of the House Committee on Appropriations, Pt. 1, 93d Cong., 2d Sess. 274-277 (1974)
Special Energy Research and Development Appropriations for Fiscal Year 1975, Hearings on H.R. 14434 Before the Senate Committee on Appropriations, 93d Cong., 2d Sess. 521-524 (1974).

It is our view that 5 U.S.C. § 3107 (1970), is vague in that it fails to define "publicity expert" and hence is difficult to apply. However, we do not believe that it is intended to interfere with the dissemination of information which an agency is required by statute to disseminate. It is apparent from the above that a large part of the statutory duties of the FEA is the dissemination of specified information to the general public and/or designated segments thereof. On the present record we have no basis for believing that 5 U.S.C. § 3107 has been violated.

We trust that the foregoing will serve the purpose of your inquiry.

Sincerely yours,

B. F. KELLEY

Deputy; Comptroller General
of the United States

Enclosure

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ENCLOSURE

1. Section 701 of the Department of Defense Appropriation Act, 1974, Pub. L. No. 93-238, 87 Stat. 1026, 1037, and section 501 of the Department of Defense Appropriation Act, 1975, Pub. L. No. 93-437, 88 Stat. 1212, 1224, provide:

"No part of any appropriation contained in this Act shall be used for publicity or propaganda purposes not authorized by the Congress."

2. Section 410 of the Departments of Labor, and Health, Education, and Welfare Appropriation Act, 1974, Pub. L. No. 93-192, 87 Stat. 746, 765, and section 409 of the Departments of Labor, and Health, Education, and Welfare Appropriation Act, 1975, Pub. L. No. 93-517, 88 Stat. 1634, 1651, provide:

"No part of any appropriation contained in this Act shall be used, other than for normal and recognized executive-legislative relationships, for publicity or propaganda purposes, for the preparation, distribution, or use of any kit, pamphlet, booklet, publication, radio, television or film presentation designed to support or defeat legislation pending before the Congress, except in presentation to the Congress itself."

3. Section 701 of the Departments of State, Justice, and Commerce, the Judiciary, and Related Agencies Appropriation Act, 1974, Pub. L. No. 93-162, 87 Stat. 636, 659, and section 701 of the Departments of State, Justice, and Commerce, the Judiciary, and Related Agencies Appropriation Act, 1975, Pub. L. No. 93-433, 88 Stat. 1187, 1208, provide:

"No part of any appropriation contained in this Act shall be used for publicity or propaganda purposes not authorized by the Congress."

4. Section 601 of the Foreign Assistance and Related Programs Appropriation Act, 1974, Pub. L. No. 93-240, 87 Stat. 1040, 1056, provides:

"No part of any appropriation contained in this Act shall be used for publicity or propaganda purposes within the United States not heretofore authorized by the Congress."

5. Subsection 607(a) of the Treasury, Postal Service, and General Government Appropriation Act, 1974, Pub. L. No. 93-143, 87 Stat. 510, 526, and subsection 607(a) of the Treasury, Postal Service, and General Government Appropriation Act, 1975, Pub. L. No. 93-381, 88 Stat. 613, 632, provide:

APPENDIX II

APPENDIX II

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"No part of any appropriation contained in this or any other Act, or of the funds available for expenditure by any corporation or agency, shall be used for publicity or propaganda purposes designed to support or defeat legislation pending before Congress."

TITLES OF PUBLIC OPINION POLL
AND ATTITUDE SURVEY QUESTIONNAIRES IDENTIFIED BY GAO AT
FIVE FEDERAL AGENCIES

DEPARTMENT OF TRANSPORTATION

United States Coast Guard

1. USCG Auxiliary Questionnaire
2. Boating Practices Survey
3. Recreation Boating Casualty Survey
4. Nationwide Boating Survey
5. User Response Questionnaire

Urban Mass Transportation Administration

6. Sun Run Bus Rider Survey
7. SOAC Survey
8. Miami Home Interview Survey
9. Miami Carpool Survey
10. Miami Bus Rider Survey
11. Form A&B Ridership Survey Questionnaire
12. General Survey Questionnaire
13. Survey of Public Reaction to TRANSP0-UMTA Sponsored
Exhibit of State of the Art Car Mockup
14. Questionnaire for Urban Corridor Travel Data in Minneapolis,
Minnesota
15. Bus Design Questionnaire

Federal Railroad Administration

16. National Rail Passenger Survey
17. Survey of Railroad Passengers

18. Advanced Ground Vehicle Survey--Automobile
 19. Advanced Ground Vehicle Survey--Common Carrier
 20. Capitol Beltway Station Questionnaire
 21. Urban Railroad Location Survey
- National Highway Traffic Safety Administration
22. Driver Licensing Guidelines Questionnaire
 23. Interview Schedule for Survey of Behavior and Attitude-Traffic Law System
 24. Automobile Purchasing
 25. NHTSA Research Project 1974 Safety Belt Questionnaire
 26. Safety Belt Interlock System Usage Survey
 27. Effectiveness of Safety Belt Warning & Interlock System
 28. Consumer Services Hotline Survey
 29. HSL User Survey
 30. Youth Alcohol Education Material Dissemination & Promotion
 31. Relationship Between Alcohol & Highway Safety
- Federal Highway Administration
32. Motorist Questionnaire Survey
 33. Dallas Urban Corridor Demonstration Program Project-On-Bus Passenger Survey
 34. Questionnaire for Urban Corridor Demonstration Program in Minneapolis, Minnesota
 35. Right Turn on Red Driver Attitude Survey
 36. Planned Residential Environments and Their Implications on Transportation-Questionnaire and Survey Plan
 37. Survey of Bus Riders to Evaluate Bus Stop Signs in Philadelphia

38. Diagramatic Signing Study Questionnaire and Procedures
39. Motorist Opinions of Influence of Mobile and Modular Home Transportation Traffic
40. Skid Questionnaire
41. Relocation Assistance Procedures Survey
42. Community Transportation Survey
43. Pedestrian and Right Turn on Red Questionnaire
44. Trucking Industry Survey Questionnaire
45. Five Program Evaluation Questionnaire
46. Flashing Traffic Control Device Survey Questionnaire
47. Involving Citizens in Identifying Neighborhood Goals, Attitudes, and Values

Office of the Secretary of Transportation

48. Boston Area Carpool Program--Mail Survey
49. DOT Retail Shipper Questionnaire
50. Community Noise Survey
51. Air Taxi Operators Questionnaire
52. University of Texas Transportation Survey Questionnaire
53. Boston Area Commuter Survey

Federal Aviation Administration

54. Concorde Community Response--Local

FEDERAL ENERGY ADMINISTRATION

1. Resurvey of Household Energy Use Attitudes and Consumption Patterns
2. Carpooling Impact Study
3. National General Public Opinion on Energy Conservation
4. Consumer Focused Group Discussions
5. New Car Buyers Survey
6. Attitudes Toward Energy Shortages and Attitudes Toward Alternate Methods of Restricting Auto Usage and Gasoline Consumption

DEPARTMENT OF THE INTERIORU.S. Fish and Wildlife Service

1. Kenai Canoe Trails Study
2. American Attitudes Toward Animals
3. Waterfowl Hunter Attitude Survey

National Park Service

4. Grand Canyon Use Survey
5. Blue Ridge Parkway Visitor Characteristics and Preferences
6. Study of Hikers on Chilkoot Trail
7. Big Bend National Park Camper & Floater Questionnaire
8. Dispersed Winter Recreation Use Patterns at Crater Lake, Oregon
9. Visitor Use Questionnaire--Yosemite, Kings Canyon, and Sequoia
10. Survey of Float Trip Visitors Grand Teton National Park
11. Guadalupe Mountain National Park Visitor Preference Survey
12. Campground Portion Survey Grand Teton & Yellowstone National Parks
13. Proposed Study of Subscribers to "Trends"
14. Questionnaire To Measure Attitudes of Float Trips on NPS Lands
15. Floater and Fishermen Survey
16. Survey of National Park Visitor Center Users
17. Roadside Questionnaire--Great Smokey Mountain National Park
18. In-county Interviews Great Smokey Mountain National Park
19. Parent Survey of Children Attending Nature School, Zion National Park

20. Delaware Water Gap National Recreation Area Visitor Use Survey
21. Jamaica Bay Visitor Usage Survey
22. Visitor Use Survey--Cape Cod National Seashore
23. Visitor Use Survey--Transportation Questionnaire
24. Backcountry User Survey--Kings Canyon National Park
25. Backcountry Day--User Questionnaire
26. Monument Valley Socioeconomic Survey
27. Public Input to Nature Interpretation at Yosemite-Camps & Trails
28. Georgetown University Poll of D.C. Residents
29. Floater Survey, Ozark National Science Riverways
30. Study of Fire Island Exempted Communities
31. Family Survey of Olympic, Mt. Rainier & Crater Lake National Parks
32. Visitor Usage Survey Form
33. Visitor Use Survey of Hidden Valley Winter Sports Area
34. Questionnaire for Visitors to Grand Canyon National Park
35. Backcountry User Attitude-Rocky Mountain National Park
36. Yosemite National Park Transportation Study
37. Park Visitation Survey
38. American Revolution Bicentennial Visitor Survey
39. Colorado River Trip Study Direct Interview Schedule
40. Mail Schedule to Past Users--Colorado River Trips Survey
41. Regional Survey of Adult Park Users
42. Visitor Use Studies
43. Survey of Visitors to Sequoia & Kings Canyon National Parks

Youth Conservation Corps

44. YCC End of Camp Questionnaire

Bureau of Indian Affairs

none

U.S. Geological Survey

45. Computer Compatible Tape Information Response

Mining Enforcement and Safety Administration

none

Bureau of Mines

46. Residents' Attitudes Toward Trash Dumping and Mine Fires

Bureau of Reclamation

none

Bureau of Outdoor Recreation

47. Recreational Resource Capacity Questionnaire

48. Willingness to Pay User Fees for Recreation-Citizen Survey

49. 1971 Survey of Consumers-Fourth Quarter

50. Youth Questionnaire-Morgan Recreation Project

Bureau of Land Management

51. Off Road Vehicle Survey

DEPARTMENT OF DEFENSE (MANPOWER AND RESERVE AFFAIRS)

1. Recruitment of Medical Professionals
2. Study of Recruitment of Members of Minority Groups to Military Service
3. Periodic Youth Survey Capability for Assessing Manpower Potential for Military Service
4. Youth Attitude Tracking Survey
5. Statement of Preference
6. Armed Forces Advertising Effectiveness Questionnaire
7. United States Disciplinary Barracks Follow-up
8. Youth Opinion Survey
9. Factors Affecting Navy Enlisted Personnel Retention
10. Survey of Attitudes Toward the Air Force and AFROTC Program at Washington State University
11. Community Attitudes Survey for Final Environmental Impact Statement
12. Three Market Survey of Attitudes Toward U.S. Army
13. Student/Education Survey
14. Army Advertising Awareness & Attitudinal Survey
15. Youth Attitude Study
16. Military Health Care Study Interview
17. Training & Education Questionnaire
18. Navy Wives Survey
19. ROTC Research Study
20. Survey Instrument for College Students
21. Survey of High School Counselors Attitudes Toward Volunteer Army
22. Armed Forces Study Questionnaire of Active Force Separates

23. Skill Transferability Information Systems (STIS) Questionnaire
24. STIS Follow-up
25. Post Service Interview Schedule
26. American Institutes for Research/Navy Incentive Survey
27. Questionnaire for Principals; and AFJROTC Cadets; for 9th & 10th Grade Students
28. University Questionnaire
29. Enlistment Incentive Survey for High School Students
30. Inventory of Prospective Air Force Officers & Airmen 1972-73
31. Homestead Medical Survey
32. Army ROTC Research Proposal (Phase II)
33. Household Survey (Economic, Social, & Environmental Effects of Randleman Hill & Howard's Mill Lake Project)
34. Survey Instrument for High School Students
35. Office of Emergency Services Radiological Defense Questionnaire
36. USAF Scholarship Survey
37. College ROTC Survey
38. Student Drug Survey (Overseas Dependents)
39. Guidance Counselor & Student Questionnaire
40. Study of Military Services Policies & Organizational Practices and Interview Segment
41. American Institute for Research/Navy Incentive Survey
42. Mail Survey: Randleman Hill & Howard's Mill Lake Project
43. Factors Underlying the Enlistment Decision
44. Strategies to Induce Enlistment in the Volunteer Army
45. Factors Underlying the Enlistment Decision-Follow-up

DEPARTMENT OF COMMERCE

Office of the Secretary

1. DOC Industry Privacy Survey
2. Interviewing the Telecommunication Industry
3. Business Management Fellowship Program (1) Company Questionnaire (2) Student Questionnaire

Domestic & International Business Administration

4. Economic Survey
5. Trade Promotion Evaluation
6. Interview Guidance Checklist
7. Trade Opportunities Survey
8. Global Market Survey Critique
9. Survey of American Business Attitudes
10. U.S. Supplier Evaluation-Foreign Buyer's Program
11. Recommendations for Export Promotion Program
12. Businessmen's Attitudes Toward Exporting and Exporting Promotional Efforts (1971)
13. Businessmen's Attitudes Toward Exporting and Exporting Promotional Efforts (1972)
14. Businessmen's Reactions to a Proposed Automated Export Trade Lead Information Service

Maritime Administration

15. Survey of Major U.S. Shippers
16. Sociological Impact Assessment

National Bureau of Standards

17. Operation Breakthrough Housing Occupant Questionnaire

18. Questionnaire on Use and Convenience of Journal of Physical & Chemical Data
19. Impact Survey, Physical Metallurgy
20. Law Enforcement Safety Legislation (LESL) Impact: Manufacturer Questionnaire (1975)
21. Taxpayer Service Study Questionnaire
22. Law Enforcement Safety Legislation (LESL) Impact: Manufacturer Questionnaire (1976)
23. Women, Infant, Children (WIC) Participant Survey
24. Questionnaire on Fire Hazards and Safety
25. Operation Breakthrough Exit Interview Questionnaire
26. U.S. Metric Study of Nonmanufacturing Industry
27. Opinion Survey: Portable Circular Saws, Table Radial Arm Saws
28. NBS Questionnaire for WWV and WWVH (Radio Stations) Services
29. Operation Breakthrough Visitor Questionnaire
30. Bus Park and Ride Lot Design Characteristics Survey for Former Auto Commuters
31. Bus Park and Ride Lot Design Characteristics Survey for Former Regular Bus Commuters
- National Oceanic and Atmospheric Administration
32. 1975 Northwest Sport Fishing Survey
33. Retail Market Survey
34. 1975 Northwest Fishing Survey
35. Evaluation of Voluntary Fishery Product Inspection Program by Present Users
36. Survey of Fishing Industry Financial Assistance Programs
- Office of Minority Business Enterprise
37. Survey of Vietnam Vets

38. Education & Training Plan Survey
39. Education and Training Need Survey
40. Marketing Survey of Spanish Speaking Nationalities
41. Magazine Ads Pretesting Samples

U.S. Travel Service

42. Survey of Canadian Travelers
43. Questionnaire Participation in U.S. Travel Service
44. Discover America Pow Wow
45. Guadalajara Followup Study
46. Survey To Determine Characteristics of Actual and Potential Travelers from U.S. to Mexico

Economic Development Administration

47. Understanding the Economic System
48. Industrial Solar Air Conditioning Survey
49. Indian Manpower Survey
50. Research Training Questionnaire (Host Agency)
51. Research Training Questionnaire (Advisor)
52. Tourism Recreation Public Works Project Impact Questionnaire

Bureau of Economic Analysis

53. BCD Subscriber Survey

PUBLIC OPINION POLLS AND ATTITUDE SURVEYSAT SIX FEDERAL AGENCIES

The public opinion polls and attitude surveys, conducted by the six Federal agencies, were made to evaluate their programs and policies and to identify program and regulatory needs. A brief summary of our work at each agency follows.

DEPARTMENT OF COMMERCE

The Department of Commerce has used attitude surveys and public opinion polls to evaluate trade promotion events, new housing projects, taxpayers services, training programs, public works projects, technical assistance projects, trade opportunities, and many other activities. We identified 53 projects which used a questionnaire with a significant number of attitude or opinion questions while a contract was awarded or a form approved for use between 1970 and 1976.

The attitude surveys and opinion polls were fairly evenly divided between those conducted by the agency and those done under contract. However, the more costly surveys were almost all done under contract. Only three surveys costing more than \$10,000 were performed by the agency, all by Commerce's National Bureau of Standards.

Analysis of Polls and Surveys Conducted
by the Department of Commerce

<u>Estimated cost</u>	<u>Performed by contractor</u>	<u>Performed by agency</u>	<u>Unknown</u>	<u>Total</u>
\$0 - \$ 10,000	10	18	-	28
\$10,001 - \$ 50,000	8	3	-	11
\$50,001 - \$100,000	4	-	1	5
Over \$100,000	6	-	-	6
Unknown	-	-	3	3
Total	<u>28</u>	<u>21</u>	<u>4</u>	<u>53</u>

The Department of Commerce has an internal procedure for clearing forms prior to submission to OMB for review. For most of the period covered by our review, clearance review work was done by the Bureau of the Census. In March 1976 the President established a Public Reports Reduction Program to reduce by 10 percent the number of Federal agency reports soliciting information from the public. As part of this program, the Secretary of Commerce transferred responsibility for clearance from the Census Bureau to the Assistant Secretary

for Administration and the Office of Organization and Management Systems. Under the new clearance arrangement the Census Bureau retained responsibility for dealing directly with OMB on its own clearance requests.

Under Commerce Department clearance procedures, the reviewing authority determines

"* * * whether the proposed plan or report form exceeds the limits of reasonable need or of practical utility, either with respect to numbers of respondents, frequency of collection, or the number and difficulty of items and whether all of the items to be furnished or recorded are essential to the central purpose of the plan or report."

The procedures also require each departmental unit which regularly develops plans and reports to designate a clearance officer to coordinate with the Department's clearance officer, cautions offices to be guided by Circular A-46, and specifies that for data collections being handled through a grant or contract, clearance reviews are to be completed before a final contract is executed.

DEPARTMENT OF DEFENSE

The Office of the Secretary of Defense, Manpower and Reserve Affairs, has used attitude and opinion surveys over the last several years to evaluate and improve recruiting programs through a knowledge of young men's attitudes and perceptions of military careers. It has also sponsored surveys to evaluate drug rehabilitation, vocational training, reserve officer training, and health care programs. We identified 45 projects which used a questionnaire with a significant number of attitude or opinion questions, where a contract was awarded or form approved for use between 1970 and 1976. Although we were not able to locate Department of Defense records for surveys before 1972, we identified several pre-1972 surveys through contacts with private polling firms. Contractors performed 37 of the 45 surveys, including all of the more costly surveys.

Analysis of Department of Defense
Polls and Surveys

<u>Estimated costs</u>	<u>Performed by contractor</u>	<u>Performed by agency</u>	<u>Total</u>
\$0 - \$10,000	7	2	9
\$10,001 - \$50,000	10	3	13
\$50,001 - \$100,000	4	-	4
Over \$100,000	10	-	10
Unknown	<u>6</u>	<u>3</u>	<u>9</u>
Total	<u>37</u>	<u>8</u>	<u>45</u>

The Department of Defense has established procedures for processing public reporting requirements. Public reporting is defined as "any reporting or recordkeeping required from any non-Federal Government, business, institution, group, or individual and which is subject to the Federal Reports Act." Each Defense component is required to obtain OMB clearance and approval before collecting information from 10 or more persons by a contractor.

The Deputy Assistant Secretary of Defense for Management Systems coordinates the sending of questionnaires to OMB for review. A further control exists over surveys designed to solicit attitudes and opinions from individuals when the Deputy Assistant Secretary, at his discretion, sends the questionnaire to the Defense Manpower Data Center for review of the statistical methodology. However, the center can only "advise" the various services on surveys being done by the service.

DEPARTMENT OF TRANSPORTATION

The Department of Transportation has used attitude surveys and public opinion polls over the last several years to evaluate retail shipping; air, taxi, train, and bus services; seat belt usage; traffic laws; boating safety; community transportation; highway safety; and laws allowing "right turn on red." We identified 54 projects which included the use of a questionnaire with a significant number of attitude or opinion questions where a contract was awarded or form approved for use between 1970 and 1976. Most surveys were done under contract and in all cases the more costly surveys were performed by contractors.

Analysis of Department of Transportation
Polls and Surveys

<u>Estimated cost</u>	<u>Performed by contractor</u>	<u>Performed by agency</u>	<u>Total</u>
\$0 - \$10,000	9	3	12
\$10,001 - \$50,000	17	-	17
\$50,001 - \$100,000	12	-	12
over \$100,000	8	-	8
Unknown	<u>5</u>	<u>-</u>	<u>5</u>
Total	<u>51</u>	<u>3</u>	<u>54</u>

The Department of Transportation has established clearance procedures which were given new emphasis with the beginning of the President's Public Reports Reduction Program in March 1976. Under Transportation's procedure each major unit has a single designated point responsible for coordinating with the Management Planning Division (the Departmental Clearance Officer within the Office of the Secretary). Requests for clearance are reviewed for possible corrections and to see that they are complete in relation to clearance regulations. We were told that surveys are also reviewed for statistical accuracy and validity; however, the regulations dealing with clearance do not mention Circular A-46. The Department did not consider it necessary to incorporate the requirements of Circular A-46 into Transportation's clearance regulations because the Circular is too general to provide substantial guidance for review of proposed statistical surveys.

DEPARTMENT OF THE INTERIOR

The Department of the Interior has used attitude surveys and public opinion polls to evaluate American attitudes and expectations toward the management of fish and wildlife; people's likes, dislikes, and preferences for various park and recreational facilities; and attitudes towards trash dumping and "off road" vehicles. We identified 51 questionnaires with a significant number of attitude or opinion questions where a contract was awarded or form approved for use between 1970 and 1976.

Most of the surveys identified--40--were conducted or sponsored by Interior's National Park Service. We did not identify any opinion polls or attitude surveys sponsored or

conducted by the Bureau of Indian Affairs, the Bureau of Reclamation, and the Mining Enforcement Safety Administration.

Most of the surveys were performed under contract. As can be seen from the following table, contractors performed all large dollar amount surveys.

Analysis of Department of the Interior
Polls and Surveys

<u>Estimated cost</u>	<u>Performed by contractor</u>	<u>Performed by agency</u>	<u>Unknown</u>	<u>Total</u>
\$0 - \$ 10,000	8	8	1	17
\$10,001 - \$ 50,000	14	4	-	18
\$50,001 - \$100,000	2	-	-	2
Over \$100,000	4	-	-	4
Unknown	<u>3</u>	<u>6</u>	<u>1</u>	<u>10</u>
Total	<u><u>31</u></u>	<u><u>18</u></u>	<u><u>2</u></u>	<u><u>51</u></u>

The Department of the Interior has an established procedure for internal review of public use reports prior to submission for OMB clearance. Under Interior's procedure, each bureau and office designates a clearance officer responsible for assuring that the information request is submitted for departmental review to the Office of Management Consulting through the head of the bureau or office or his designee, the office of the appropriate supervising Assistant Secretary, and the Privacy Act Officer, if needed. The Office of Management Consulting coordinates any other reviews and sends the packages to OMB for clearance. The regulation governing the procedures states that

"Any proposal subject to the clearance requirements of this chapter which will result in the collection * * * of statistical data must also conform to the requirements prescribed in Circular No. A-46 Revised."

DEPARTMENT OF STATE

Although the Department of State generally avoids conducting or sponsoring public opinion polls and attitude surveys, its experts use reports from public opinion polling organizations to analyze the views of the American people on many topics. For example, a June 1976 memorandum concerned Americans' opinions on the Panama Canal issue based on a comparison of an opinion poll by the Columbia Broadcasting System with two previous polls by Opinion Research Corporation. Another memorandum to the Secretary of State contained an analysis of a public opinion poll conducted by

Louis Harris and Associates on the Secretary of State's standing with the public. Other memorandums covered subjects ranging from opinions on territorial waters to the public's views on the United Nations. The purpose of these memorandums is to provide a greater base of knowledge about the public's opinions on various subjects for use by State Department officials in Washington and abroad.

State Department officials explained that the Department avoids conducting or sponsoring public opinion polls of the American people because of its previous experience with congressional reactions to public opinion polling.

In 1957 the Subcommittee on International Operations of the House Committee on Government Operations held hearings to look into a newspaper story which reported that 90 percent of the American public favored foreign aid. The story--based on a public opinion poll--differed substantially from the constituent mail opinions being received by several congressmen. These congressmen questioned the validity of the poll's results and the intentions of State Department officials when they found that the poll had been sponsored by the Department and the results had been "leaked" to the press by an official in the foreign aid program.

The Subcommittee found that the State Department had sponsored seven or eight public opinion polls between 1944 and 1957 to keep top State Department officials informed of trends in American opinion. Regarding the poll in question, the Subcommittee found:

--The sample was too small to permit adequate analysis.

--The poll failed to distinguish between informed and uninformed opinion which often led to absurd results.

--The interpretation of the results by State Department officials was incorrect.

It recommended that in any future polls, the State Department take care that sufficiently large samples were used to permit adequate analysis of the results.

The State Department's Foreign Affairs Manual provides that the directives staff in the Foreign Affairs Document and Reference Center of the Bureau of Administration is responsible for maintaining liaison with the Office of

Management and Budget on all matters relating to public use forms. Requests for new forms or revisions of existing forms are made to the directives staff, where they are reviewed to make certain that the clearance package contains all the information OMB requires. The package is then forwarded to OMB for action.

We did find a series of public opinion polls which involved the State Department, although the Department neither sponsored nor conducted them.

The Town Meeting Program

In July 1975 the State Department, with the cooperation of World Affairs Councils, initiated the Town Meeting Program. The meetings were to provide an avenue of communication between the State Department and the American public.

Town meetings sponsored by local World Affairs Councils were planned for five major metropolitan areas--Pittsburgh, Portland (Oregon), San Francisco, Milwaukee, and Minneapolis. State Department representatives listened to comments on foreign policy from those attending in order to get a better idea of the American public's opinions.

To determine whether the opinions expressed at these meetings were representative of the cities in which the meetings were held, a State Department official suggested to the Director of International Affairs of the Charles F. Kettering Foundation that the foundation conduct public opinion polls for comparison with the opinions expressed at the meetings. Kettering Foundation officials agreed and sponsored a telephone survey in each of the five cities in connection with the meetings.

Although State Department officials did become involved with the development of the questionnaire, we were told they did not exercise final control over questionnaire content. A State Department official told us that OMB's Clearance Officer had exempted the questionnaire from clearance because the State Department was not officially conducting or sponsoring the poll.

The polls, consisting of random telephone samples of 300 persons in each city, were conducted prior to the Town Meetings and the results were presented at the meetings. The results of the polls and the Town Meeting were summarized in a series of memorandums and distributed to officers in the State Department, including all assistant secretary level officials. Copies were also mailed to the individuals who attended the Town Meetings.

The Kettering Foundation has used some of the data as source material for a published report on public opinion toward foreign policy issues in three of the five cities. A draft report covering an analysis of the data for all five cities had been prepared but had not been published at the time of our review.

FEDERAL ENERGY ADMINISTRATION

We identified six attitude or opinion surveys sponsored by the Federal Energy Administration during 1974 through 1976. These surveys concerned changes in household energy use, the impact of various carpooling policies, costs and availability of energy, conservation, the effect of fuel economy publications on new car purchases, and attitudes toward energy shortages.

Contractors performed all six surveys. They ranged in cost from \$13,500 to \$245,000. Clearance was obtained from GAO for two of the six surveys. Under GAO regulations, the other four did not require approval because they were telephone and personal interviews.

FEA initiated a formal procedure in February 1975 governing the internal clearance of public-use reports. Prior to that time, although FEA officials were familiar with the Federal Reports Act and the need to obtain clearance for at least some data collection efforts, there was no formal internal clearance procedure.

Under FEA procedures, all public-use forms were submitted by the initiating office to the Office of Data Services accompanied by the form and instructions for respondents, the information package required by GAO, the survey plan, a list of presurvey contacts both in and out of Government, and a justifying memorandum. The Office of Data Services coordinated any internal FEA reviews and submitted internally approved forms to the FEA Form Control Officer. The Form Control Officer reviewed the package for completeness and coordinated obtaining approval from GAO.

Although FEA procedures called for a number of reviews, there was no reference to complying with the provisions of Circular A-46 and no formal review of statistical and survey methodology in terms of this circular.



UNITED STATES DEPARTMENT OF COMMERCE
 Chief Economist for the Department of Commerce
 Washington, D.C. 20230

.. . 1078

Mr. Henry Eschwege
 Director
 Community and Economic
 Development Division
 U.S. General Accounting Office
 Washington, D.C. 20548

Dear Mr. Eschwege:

Thank you for the opportunity to comment on your draft report entitled "Better Guidance and Control is Needed to Improve Federal Surveys of Attitudes and Opinions." My comments are limited to your recommendations concerning the statistical policy functions which have recently been transferred to my Department from the Office of Management and Budget.

In general, I share the concern expressed in your report that inadequate guidance presently is available to agencies conducting opinion polls and surveys. The present resources of the Office of Federal Statistical Policy and Standards (OFSPS) are seriously inadequate to meet these and other important statistical policy coordination needs. The staff expansion proposed in our FY 1979 budget request should enable us to do a more adequate job.

Your first recommendation, to provide more guidance on potential survey problems and on preparing requests for proposals (page 15) is, in general, supported by us.

We would like to strongly support your references to "A Framework for Planning U.S. Federal Statistics, 1978-1989" in which the OFSPS has emphasized that guidelines for contracting for statistical surveys should be developed. Presently, a subcommittee of the Statistical Methodology Committee, referred to earlier, is studying this problem, and we expect some developments in this area.

Your second, third and fourth recommendations: to develop criteria for early review and for monitoring during implementation; to establish systems for this review and monitoring; and to institute post-review of selected surveys (pages 21 and 25) are consistent with our present policy. Upon issuance of your report, we will seek ways to further develop such criteria and systems.



Your final recommendation (page 28) pertains to assuring that surveys and polls conducted by independent Federal regulatory agencies are subject to review for adherence to statistical standards.

In your report you note that the Director of the Office of Federal Statistical Policy and Standards pointed out that the Section 103 responsibilities for planning and coordinating statistical programs applies to all agencies, including regulatory agencies. In order to implement your recommendation, we believe it would be a simple matter for GAO staff to simply call upon OPSPS staff as is presently the case for the Office of Management and Budget when issues of statistical design appear to be important in the clearance action.

Although we in general support your report's recommendations, there are several points on which some clarification is needed.

On page 4 the statement of the role of the Office of Federal Statistical Policy and Standards will be made inaccurate as a result of the new Guidelines expected to be issued by the Office of Management and Budget. In these new Guidelines the Office of Federal Statistical Policy and Standards is responsible for the substantive review of statistical surveys. Additionally, the Office provides advisory opinions to the OMB Clearance Officer on statistical issues relating to management reports, administrative reports, and other reports for which OMB has substantive responsibility. I will forward a copy of the OMB Guidelines for your information when they are issued later this month.

As a result of the transfer of statistical policy functions from the Office of Management and Budget to the Department of Commerce, the OMB Circulars will be rescinded and reimplemented by my Department in the Statistical Policy Handbook. In order to simplify your report, you may simply want to footnote the fact that OMB Circular No. A-46 is now to be implemented in the Statistical Policy Handbook. The standards for statistical surveys will be Statistical Policy Directive No. 1. Further, in the first paragraph discussion in Chapter 2, you state that the "Standards for Statistical Surveys" do not take into account the fact that Federal agencies use contractors. That is not accurate since

the Standards apply to contractors (as noted in the Introduction of the Directives) as well as to Federal agencies, and the general principles are equally applicable to both.

On page 11 your discussion of nonsampling errors could further reference the ongoing study by the Office of Federal Statistical Policy and Standards' Federal Committee on Statistical Methodology which will soon issue a report on nonsampling errors as one of the continuing series of statistical policy working papers. We believe that this new report will be of considerable aid to the designers of surveys.

I hope these comments are helpful, and we look forward to the final publication of your report.

Sincerely,

Courtenay M. Slater
Chief Economist for the
Department of Commerce

Enclosures

CAO Note: Page references in the appendix refer to the draft report and do not necessarily agree with the page numbers in the final report.



Department of Energy
Washington, D.C. 20545

MAR 17 1978

Mr. Monte Canfield, Jr., Director
Energy and Minerals Division
U.S. General Accounting Office
Washington, DC 20548

Dear Mr. Canfield:

We appreciate the opportunity to comment on your draft report entitled "Better Guidance and Control is Needed to Improve Federal Surveys of Attitudes and Opinions."

With respect to the GAO statement on page 76 pertaining to circular A-46, the DOE Office of Energy Data Validation (OEDV) will strongly emphasize statistical reliability of the proposed survey methodology in compliance with the provision of circular A-46. Also, early attention will be given to the criteria used for the sample plan, sampling techniques, potentials for respondent bias and non-response.

Sincerely,

A handwritten signature in cursive script, appearing to read "Fred L. Hiser".

Fred L. Hiser, Director
Division of GAO Liaison



ASSISTANT SECRETARY
FOR ADMINISTRATION

OFFICE OF THE SECRETARY OF TRANSPORTATION
WASHINGTON, D.C. 20590

March 17, 1978

Mr. Henry Eschwege
Director
Community and Economic
Development Division
General Accounting Office
Washington, D.C. 20548

Dear Mr. Eschwege:

We have enclosed two copies of the Department's reply to the General Accounting Office (GAO) report "Better Guidance and Control Is Needed To Improve Federal Surveys Of Attitudes and Opinions."

GAO concludes that attitudes and public opinion polls, sponsored or conducted by many Federal agencies, often contain technical flaws which limit the usefulness of the results. GAO recommends that the Secretary of Commerce amend the statistical standards to provide better guidance, develop criteria and procedures for early review of opinion surveys and a selected review of surveys during implementation, and institute a program of post review of the conclusions reached on the basis of selected opinion surveys. GAO also recommends that the Secretary of Commerce establish a procedure to make opinion surveys by independent regulatory agencies subject to statistical standards.

We agree that there is a need for more guidance from the Office of Federal Statistical Policy Standards (OFSPS) on developing data collection plans and requests for proposals related to public opinion surveys. A selective follow-up on the conduct of surveys would provide useful feedback on field problems which would lead to corrective procedures and a more effective review. The Department supports an extension of statistical standards to cover independent regulatory agency reviews.

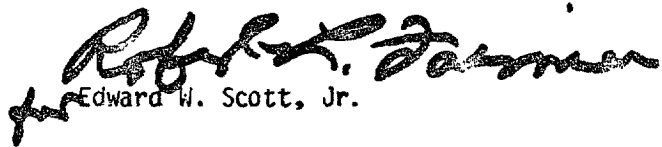
The Department does not believe a requirement for early review, beyond that now required for clearance of requests for proposals and contract statements of work, is workable or in the interest of effectively carrying out Federal programs.

The Department does not believe that a post review of opinion surveys and a reporting of this post review would be a proper function of a Federal agency such as OFSPS, and would not add to the credibility of Federal reports. However, standards should be developed for the manner in which survey results are reported, including variances, response rates, etc., so that the users can judge for themselves the usefulness of the data and fairness of the interpretations.

GAO cites many problems in the case study of the Federal Aviation Administration sponsored survey of public reaction to the Concorde landings and concludes that it would be very difficult to draw reliable conclusions from the data. We recognize the limitations in the survey and reporting. However, we take issue with some of GAO's damaging comments. In our opinion, GAO overstated the impact of these limitations on the overall usefulness of the data. GAO should reference the limitations in the use of the data rather than the impossibility of working comparisons.

Please let us know if we can assist you further.

Sincerely,


for Edward W. Scott, Jr.

Enclosure

GAO Note: The enclosure is not included in this report. The report has been revised based on the material presented in the enclosure.



DEPARTMENT OF STATE

Washington, D. C. 20520

March 21, 1978

Mr. J. K. Fasick
Director
International Division
U.S. General Accounting Office
Washington, D. C.

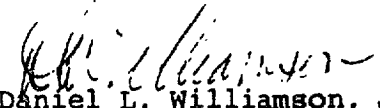
Dear Mr. Fasick:

I am replying to your letter of February 8, 1978, which forwarded copies of the draft report: "Better Guidance and Control is Needed to Improve Federal Surveys of Attitudes and Opinions."

The enclosed comments were prepared by the Assistant Secretary for Public Affairs.

We appreciate having had the opportunity to review and comment on the draft report. If I may be of further assistance, I trust you will let me know.

Sincerely,


Daniel L. Williamson, Jr.
Deputy Assistant Secretary
for Budget and Finance

Enclosure: As stated

GAO Note: The enclosure is not included in this report. The report has been revised based on the material presented in the enclosure.