



May 26, 2015

To whom it may concern:

On behalf of the Population Association of America's (PAA) Committee on Population Statistics (COPS) and Association of Population Centers (APC), we are pleased to respond to the April 28, 2015 *Federal Register* notice, requesting comments on proposed changes to the American Community Survey (ACS) and on efforts to further evaluate survey content and operations.

The ACS is the nation's most important source of data on changing demographic, socioeconomic, and housing characteristics. ACS data are vital to not only informing the research that PAA and APC members conduct, but also to guiding important decisions public and private sector officials make, affecting the health and well-being of America's communities, large and small.

We support the Census Bureau's efforts, in the formation of the Interagency Council on Statistical Policy Subcommittee for the ACS (ICSP-SACS), to review the content of the ACS in the contexts of federal agency requirements and respondent burden. As reported in the *Federal Register*, that cost-benefit analysis resulted in the proposed elimination of five questions from the 2016 ACS: Business/Medical Office on Property; Undergraduate Field of Degree; and three questions related to Marital History. PAA and APC submitted comments to the Department of Commerce, urging the agency to reconsider retaining the undergraduate field of degree and marital history questions. We are very pleased that the Bureau heeded our comments, and the significant input it received from the data user community, and is now proposing to maintain these important questions on the ACS.

While the Census Bureau should be commended for undertaking this activity, the PAA and APC believe that the absence of non-federal data user input seriously compromised the process. Non-federal data users represent the large majority of those who use ACS products and the Census Bureau should seek their input directly, and not exclusively via the federal agencies. *Thus, the PAA and APC recommend that, going forward, the ACS content evaluation process should include organizations, associations, and data user groups that are comprised of or work directly with non-federal data users*, such as: the State Data Centers; the Association of Public Data Users; the Committee on Applied Demography of the PAA; the Social Statistics and Government Statistics Sections of the American Statistical Association, and the ACS Data Users Group. Moreover, experts within these organizations, associations, and data user groups should be recruited to create a Standing Committee on the ACS, as per the first recommendation in a recent report from a National Academy of Sciences Panel on the ACS.ⁱ Further, based on another recommendation from the National Academy Panel, the Census Bureau should engage in an empirical evaluation of how ACS data are currently being utilized, using information from American FactFinder and other avenues of dissemination on the Census Bureau website as well as information from non-federal distributors of the data.

The PAA and APC believe these actions would ultimately result in more inclusive and better-informed determinations going forward. Moreover, it may avoid the situation described in this *Federal Register Notice*, where the federal agency review clearly failed to yield sufficient information for a set of informed decisions. This process proved to be very time-consuming and

costly, where hundreds of comments on the proposed elimination of questions were received, only to have the decision on four of the five questions ultimately rescinded, once the full-range of uses of the data came to light.

The PAA and APC believe that the importance of a standing group, representing non-federal ACS data users is essential given the variety of approaches the Bureau is considering to increase the efficiency of ACS field operations and streamline content. Approaches aimed at selectively asking questions at alternate time intervals or of a subset of the population require in-depth knowledge of how ACS data are being used. The PAA and APC cannot see how such an assessment could be based solely on federal agency input, since such proposals drive the five-year estimates, which are the lifeblood of data for most local stakeholders. Therefore, the PAA and APC strongly endorse “The Census Bureau plans to engage the federal agencies and external experts on this topic during 2015.” Those external experts need to include the data intermediaries that represent the interests of local non-federal data users, especially those whose sole source of information is the five-year period estimates.

Finally, the PAA and APC applaud the development of approaches to curb the number of in-person contact attempts, especially given the potential to free-up resources for other areas of the survey. However, given the fact that the ACS conducts in-person follow-up on only a sample of non-responding households and given the wide breadth of information on the ACS questionnaire, the PAA and APC urge the Bureau to continue its efforts to monitor the quality of responses, especially regarding item imputation. Research by the Census Bureau has shown that the ACS has relatively low levels of item imputation,ⁱⁱ and earlier studies showed that the levels of item nonresponse were generally lower in the ACS relative to the decennial census long form.ⁱⁱⁱ To the Bureau’s credit, most of this has been attributed to the use of professional interviewers in the ACS. Thus, the PAA and APC strongly agree with the language in the Federal Register Notice aimed at “...reducing the number of in-person contact attempts while preserving data quality.”

The PAA and APC believe that alternatives to mandatory response in the ACS, to the extent that they compromise self-response, need to be discouraged, since even a small drop in self-response leads to increases in costs associated with interviewer follow-up, in an era when the Census Bureau’s budget is under constant pressure.

Thank you for this opportunity to comment on proposed changes to the ACS and future efforts to evaluate survey content and operations. Once again, while we are pleased the revised proposal recommends retaining the undergraduate field degree and marital history questions, we believe the Administration should consider the procedural changes we’ve outlined in this letter. We look forward to working with the Administration to preserve the integrity of the ACS.

Sincerely,



Steve Ruggles, Ph.D.
President, PAA



Lisa Berkman
President, APC

ⁱ *Realizing the Potential of the American Community Survey: Challenges, Tradeoffs, and Opportunities.* (2015). Panel on Addressing Priority Technical Issues for the Next Decade of the American Community Survey, Committee on National Statistics, Division of Behavioral and Social Sciences and Education. Washington, DC: The National Academies Press, p 2.

ⁱⁱ Sandra Lockett Clark (2015). "Documentation and Analysis of Item Allocation Rates: Final Report." American Community Survey Research and Evaluation Program. Washington: U.S. Census Bureau.
http://www.census.gov/acs/www/Downloads/library/2015/2015_Clark_01.pdf

ⁱⁱⁱ Citro, Constance and G. Kalton (2007) "Using the American Community Survey: Benefits and challenges." Committee on National Statistics, Division of Behavioral and Social Sciences and Education, Washington, DC: National Academies Press, pp. 51-53