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December 18, 2023

Ms. Sheleen Dumas

Department PRA Clearance Officer

Office of the Under Secretary for Economic Affairs

U.S. Department of Commerce

1401 Constitution Ave., NW

Washington, DC 20230 Submitted via <http://www.regulations.gov>

**Re: Response to FRN 2023-23249: Comment Request American Community Survey and Puerto Rico Community Survey**

Dear Ms. Dumas,

On behalf of the Population Association of America (PAA)

([www.populationassociation.org](http://www.populationassociation.org)) and the Association of Population Centers

(APC) ([www.populationcenters.org](http://www.populationcenters.org)), we are pleased to submit comments in

response to a *Federal Register* Notice published by the U.S. Census Bureau on 20

October 2023 ([Citation 88 FR 72424; Document Number 2023-23249](#)) requesting

comment on the proposed revision of the American Community Survey (ACS)

and Puerto Rico Communication Survey (PRCS).

PAA is the premier professional, scientific society for more than 3,000 behavioral and social scientists—including demographers, sociologists, economists, epidemiologists, and statisticians—who study the causes and consequences of population change. Our members conduct research and train scientists at U.S. universities and independent research organizations. APC is composed of approximately 40 federally funded, interdisciplinary population research centers nationwide. Our members are intimately involved in many methodological aspects of the ACS and PRCS, including evaluating the design, collection, and results of these surveys and the substantive analysis of the resulting data. Our members conduct independent research using ACS and PRCS data, work for or advise federal, state, local, and tribal governments on methodological and substantive issues with data from ACS and PRCS, and disseminate findings to policymakers, stakeholders, and the public. Given these important connections, our members have a high stake in ensuring the ACS and PRCS data achieve the highest possible scientific standards.

As the largest household survey in the United States, the ACS is critical to demographers in their ability to conduct social, economic, and demographic research. Therefore, we have a vested interest in ensuring the ACS is conducted accurately, inclusively, and effectively.

## **1. Overall**

We appreciate the Census Bureau’s efforts to keep the ACS current, employ best practices in question and response design, and evaluate the effects of proposed changes. While we support many of the proposed changes, we are also concerned that some of the proposed changes will introduce data discontinuities that make it difficult to track trends. Data discontinuities are especially concerning for small areas or populations that require five years of data before the improvements are fully realized.

Recommendation: Whenever possible, the Census Bureau should provide guidance and data crosswalks designed to facilitate continuity between previous and future versions of the ACS.

## **2. ACS Content Test**

Background: Based on the evaluation of proposed changes, we have concerns about benchmarks, missing data, response distributions, reliability, biases, and how changes may differentially affect different groups that are not addressed in published reports.

Recommendation 1: We recommend that the Census Bureau publish the details of the content testing and results, including the timing of data collection, sample sizes for different conditions, benchmarks used, item missing data rates, response distributions, and response reliability and bias.

Recommendation 2: Because content changes in the ACS may affect some groups differently than others, we recommend that the Census Bureau conduct and share results of analyses of variability in the test results, e.g., by race/ethnicity, educational attainment, and age group.

## **3. Household Roster Instructions**

Background: Nearly all questions in the ACS are tied to the household roster. While the proposed changes appear to improve enumeration of complex households and the missing data rate, there does not appear to be improvement in counting persons with tenuous connection to households, and it is unclear whether there was improvement in the enumeration of young children (ages 0-4). Regarding the enumeration of young children, the test version of the household roster instructions read: “INCLUDE: babies and children, or unrelated, including grandchildren and foster children.” This change should have increased the number of young children enumerated, but it does not appear to have done so. We are concerned about the lack of clarity and conflicting results related to how the proposed changes would affect the count of children ages 0-4. These concerns are based on the following:

- The Census Bureau’s presentations to the Census Scientific Advisory Committee (CSAC) and National Advisory Committee on the roster component to the ACS content test and the Federal Register Notice (FRN) provided conflicting results about the count of young children. Census Bureau presentations indicated there was no significant difference between the current ACS question and the tested question in terms of the number of young children on the final roster. Specifically, slide 6 of the CSAC presentation (U.S. Census Bureau 2023a) indicated that the control version and the test version “show no significant difference” for young children ages 0-4 on the final roster. However, the FRN concluded, “the revisions to the instructions help improve within household coverage, especially among young children...” The contradictory evidence on the same issue makes it difficult for stakeholders to provide informed input.
- Table 7 of the ACS Content test report on rostering shows that both the control and test versions of the questionnaire found about 12.5 million children ages 0 to 4. However, the 2022 ACS shows about 18.5 million children ages 0 to 4. The report does not adequately explain why the number of young children in the ACS test is so much lower than the number in the 2022 ACS. It is possible that the large difference is due to weighting limitations, but, if that is the case, it should be made clear.
- The ACS roster test report concludes: “3) a higher percentage of young children (0-4) were added during the second roster screen in the test version (page v).” This is posed as a positive outcome based on the earlier statement in the paragraph that: “a potentially more accurate roster in the test version than the control version.” However, it appears that the reason more young children were added during the second roster screen in the test version is because they were left off the roster in the first test screen. This should not necessarily be interpreted as a positive outcome.
- In the Content Test Report, the Census Bureau appears to change terminology between the Executive Summary (when they use “second roster screen” and the part of the report that describes young children added to the response (Table 18, page 31), when they use “Roster B screen”. The switch in terminology leads to lack of clarity about the findings.

Recommendation 1: Given the importance of the household roster to all other aspects of the ACS, before the proposed changes are adopted, the Census Bureau should provide more clarity about the results of the test on the count of young children, including more information on sample sizes, standard errors, and significance levels, information about any additional tests (e.g., cognitive testing), and plans to use Social Security Administration data

to address the undercount. Once that clarifying information has been published, the Census Bureau should solicit additional feedback from stakeholders.

Recommendation 2: The difference in household roster instructions related to inclusion of children between the control question and the test question is very small. The wording change in the ACS test question relative to the production question was similar to the wording differences between 2010 and 2020 Census. Neither the change between the 2010 and 2020 Censuses nor the control and test ACS questions improved the count of young children. Getting a more complete count of young children is likely to require bolder changes on the part of the Census Bureau.

*U.S. Census Bureau (2023a). "2022 American Community Survey Content Test Result," presentation to the Census Scientific Advisory Committee, by Joan Hill, September 21, 2023.*

*U.S. Census Bureau (2023b). "2022 American Community Survey Content Test Evaluation Report: Household Roster, Final Report," Kathleen M. Kephart, Broderick E Oliver, Gregory Mills, and Jason Lizarraga, November 2023.*

*U.S. Office of Management and Budget (2023) "American Community Survey 2025 Content Changes Federal Register Notice," posted October 20, 2023.*

#### **4. Educational Attainment**

Recommendation: We support the adoption of the test version for educational attainment.

#### **5. Health Insurance Coverage**

Recommendation: We support the adoption of test version 2 for health insurance.

#### **6. Disability**

Background: The proposal to move from a binary "yes"/"no" response to level of difficulty approach will enable stakeholders to take advantage of variability in responses in a way that is not possible with the binary approach. The level of difficulty approach better reflects the reality of the disability experience than a simple binary measure and will enable community planners and service providers to better identify service needs related to populations with the greatest need. However, we are also aware of concerns that the proposed change could reduce the count of people with disabilities, particularly if the Bureau does not release data on the full range of responses. In addition, as an organization concerned with understanding changes in population characteristics over time, we are concerned that the change will make it challenging to examine disability trends over time. Beyond the proposed response anchor changes, we also note that the current ACS disability categories do not capture

mental health, learning, intellectual and development disabilities, and chronic disabling conditions, such as long-COVID (Swenor and Landes 2023).

*Swenor, Bonnielin, and Scott Landes. 2023. "The Next Census Could Undercount the Number of Disabled Americans by 20 Million." STAT. Nov. 27, 2023*

**Recommendation 1:** If the Census Bureau opts to implement its proposed revised measures, we recommend that the Bureau publish the counts for the full range of responses on the disability items, regardless of which version of the Test question is adopted, to enable data users to categorize respondents in the way they deem most useful. We also recommend that the Census Bureau develop and publish a crosswalk between the existing and revised disability measures to support the analysis of trends.

**Recommendation 2:** If the Census Bureau opts to implement its proposed revised measures, we recommend that the change and anticipated consequences be communicated widely to stakeholder groups, including those at the state and local levels (e.g., health officials, urban planners).

**Recommendation 3:** In the longer term, we recommend that the Census Bureau undertake efforts to integrate into the ACS measures of disabilities related to mental health, learning, intellectual and development disabilities, and chronic disabling conditions.

## **7. Income, Labor Force Participation, and SNAP**

**Background:** The Census Bureau proposes to shift the reference period for questions about income, labor force participation, and the Supplemental Nutrition Assistance Program (SNAP) from 12 months to the prior calendar year. On a positive note, the reference period would be the same for all survey respondents, and, given that tax returns are completed based on calendar years, many respondents might be better positioned to report their income from the prior calendar year rather than the 12 months preceding the interview. As a result, estimates based on the proposed reference period would be clearly, consistently, and coherently tied to a particular calendar year for all respondents, helping with summarizing trends. However, the proposed change also raises a concern about recall period. Given that the ACS collects data on a rolling basis throughout the year, the proposed approach would result in a much longer recall period for many respondents compared to the current 12-month recall period. For example, a respondent completing the ACS in December would have a recall period starting almost 2 years prior. Another concern is that the proposed change complicates the ability to align these items with other ACS components, including the roster and derivative measures, such as poverty. For example, given a 13% change in addresses annually, poverty estimates based on income over the previous 12 months/current household size vs. income in the previous calendar year/current household size could lead to sizable mismatches in incomes relative to household sizes. Mismatches are more pronounced with longer recall periods.

Recommendation 1: Before the Census Bureau implements the reference period change, additional tests of data quality should be performed to focus on how findings are influenced by the timing of data collection throughout the year and the length of the recall period.

Recommendation 2: If the Bureau does shift to a calendar year retrospective report, we recommend that the Bureau document the consequences for the 5-year averages at different levels of geography (e.g., state, county, census tract), provide a crosswalk, and widely share the information.

## **8. Electric Vehicles, Solar Panels, Sewage Disposal**

Background: Having accurate and timely information about infrastructure availability, needs, and disparities is critical to infrastructure development and funding decisions. The proposed addition of questions about plug-in electric vehicles, solar panels, and sewage disposal could help to inform these efforts. However, the results of the cognitive testing related to the sewage question are concerning (U.S. Census Bureau 2022). In general, the findings suggest that respondents did not have a strong understanding of the sewage disposal system. In the group tested on this question (Group 1), 19 of 37 participants (round 1) and 25 of 38 participants (round 2) did not know the type of septic system connected to their household using test version 1 that asked respondents to select the main type of sewage disposal for their building. Although respondents appeared to have performed slightly better on version 2 (which asks Yes/No questions about whether the building is connected to a public sewer, septic system/cesspool), understanding was still low, and many respondents appeared to have guessed. Report findings also suggest that identifying sewage disposal type may be difficult for renters.

*U.S. Census Bureau (2022). "Cognitive Testing for the 2022 ACS Content Test: Round 1 and 2 Combined Brief Report." April 2, 2022.*

Recommendation 1: We support the addition of test version 2 for electric vehicles and the test version for solar panels.

Recommendation 2: We recommend that the Census Bureau consider whether the ACS is really the best tool for collecting housing unit information about sewage disposal. The Census Bureau may be able to collect more accurate information from administrative or commercial data than from respondent self-reports. If the Census Bureau decides to include questions about sewage disposal in the ACS, before any such questions are added, the Bureau should conduct and share with stakeholders the results of cognitive tests by homeownership status, educational attainment, and age group.

Thank you for giving the population research community an opportunity to comment on the proposed revision of the American Community Survey and Puerto Rico Community Survey.

Sincerely,

A handwritten signature in black ink, appearing to be 'L Berkman', with a long horizontal stroke extending to the right.

Dr. Lisa Berkman  
2023 PAA President

A handwritten signature in black ink, appearing to be 'J Brand', with a large, stylized 'J' and a long horizontal stroke extending to the right.

Dr. Jennie Brand  
2023-2024 APC President