

23 December 2024

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 Federal e-Rulemaking Portal: <http://www.regulations.gov>

**Re: Response to FRN 2024-24529: Comment Request for American Community Survey Methods Panel Tests**

Dear Ms. Dumas,

On behalf of the Committee on Population Statistics (COPS) of the Population Association of America (PAA), I am pleased to respond to the notice in the 23 October 2024 *Federal Register* requesting comments on the American Community Survey (ACS) Methods Panel tests.

PAA represent about 3,000 individual population scientists—including demographers, economists, sociologists, and epidemiologists. Population scientists study the individual, societal, and environmental implications of population change—and thus contribute key findings that help inform evidence-based policy making in the public and private sectors. PAA-COPS is a group of PAA members, appointed by the PAA President, who discuss technical issues and activities important to Federal statistical agencies and advise the PAA leadership on these issues. Population scientists use the ACS extensively to study the many of the aforementioned topics as well as other related scientific and policy research issues. As the largest household survey in the United States, the ACS is critical to demographers in their ability to advance social, economic, and demographic research.

PAA-COPS supports the plan and the proposed timeline described by the Census Bureau in the *Federal Register* notice for undertaking the ACS Methods Panel tests. The various elements of the plan are important, and a further valuable feature of the methods panel is its role as a testbed for the 2030 decennial census. Especially timely and useful will be tests using the methods panel of changes in measurement of disability and implementation of Statistical Policy Directive 15 on collecting federal data on race and ethnicity.

The various methodological tests proposed for the ACS Methods Panel are appropriate and valuable options to assess. The *Questionnaire Timing Test*, which is design to assess the impact of including a Quick Response (QR) code in printed materials, is likely to be effective in providing respondents with rapid access to the internet data collection instrument—but evidence of its effectiveness will be useful to document and for developments and refinements.

The *Internet Instrument Response Option and Error Message Design Test* is designed to further develop web standards for questionnaire instruments. A concern with this test is how it is how the test will evaluate the use of different devices. In particular, the “hover over” option is unlikely to work well on smartphones and changes in color may also not be clearly visible on mobile devices compared to computers or tablets and error messages may also perform differently. We encourage the Census Bureau to consider the full range of devices and operating systems that respondents may use in testing questionnaire design elements.

The *Additional Internet Instrument Testing* component updates standards developed in 2013 to

the present and seems overdue. Again, the increased use of smartphones is a key consideration for revisions to the standards.

For the *Self-Response Mail Messaging and Contact Strategies Testing*, refinements and improvements to communications materials to increase self-response to the survey is an important initiative for the Census Bureau to pursue. Particularly important is the need to understand the effects on response of having fewer or additional mailings (and other contact attempts) compare to the baseline of five mailings. More generally, there is a pressing need to investigate the sequencing, timing, mode and content of different types of contact attempts using responsive and adaptive design in order to efficiently promote higher response rates.

Regarding the *Content Testing* that would be undertaken with the ACS Methods Panel, there are two topics that deserve particular attention from the Census Bureau.

First is the measurement of disability, on which the Census Bureau should work with OMB and other federal statistical agencies in the Interagency Council on Statistical Policy to examine the process by which revisions are proposed by agencies. Revisions to the disability items that are being considered for ACS may be needed, but require appropriate consultation and input. The material supporting a proposed revision should include not only a scientific justification but a plan of outreach to affected stakeholders before the revision is proposed to better anticipate and address their concerns. Effective stakeholder engagement is not simple; it should include information notices and listening sessions. The content test could develop specifications for stakeholder engagement.

A second topic ready for content testing is the new race and ethnicity items based on Statistical Policy Directive 15 (SPD 15). Understanding if and how the revised SPD 15 questions generate differences in responses will be important not only for the Decennial Program but for the full federal statistical system. No other statistical agency has the resources to conduct such a study. Hence, it would be ideal if a version of this comparison could also be made without providing the “some other race” category that Census is required to offer, but no other federal statistical agency is permitted to use. Without that additional comparison, the 15 other federal statistical agencies and units will not meaningfully benefit from the race/ethnicity testing on the ACS. The Content testing of race and ethnicity should disseminate the results to the OMB standing committee on federal measurement of race and ethnicity, and also provide a public webinar on testing results to improve transparency. Finally, we note that while the ACS Methods Panel is scheduled to run 2025 to 2028, the Census Bureau has announced a plan to begin collecting information on race/ethnicity using the SPD 15 standards in 2027. We encourage the Census Bureau to consider the implications of this overlap for assessing the implementation of the new race/ethnicity items and for possible innovations in testing design.

In closing, PAA-COPS appreciate the opportunity to respond to this *Federal Register* notice and thank the Census Bureau for their planned testing to enhance and improve the ACS. We look forward to the Census Bureau working with our members and other data users to learn and understand the results from these important tests.

Thank you for considering these comments.

Sincerely,



Dr. Narayan Sastry  
Chair, Committee on Population Statistics, Population Association of America