May 16, 2013

Brian A. Harris-Kojetin, Ph.D.
Statistical and Science Policy
Office of Management and Budget
725 17th Street NW, Room 10201
Washington, DC 20503

Dear Dr. Harris-Kojetin:

On behalf of the Population Association of America (PAA) and the Association of Population Centers (APC), we are writing in response to an announcement published in the April 16, 2013, issue of the Federal Register regarding the American Community Survey (ACS) (OMB control number 0607–0810). Specifically, we are writing to comment on the announcement’s proposed elimination of the “number of times married” question on the ACS.

The PAA and APC are two affiliated organizations that together represent over 3,000 population scientists worldwide, including demographers, sociologists, economists, and statisticians, who conduct research on the implications of population change. A number of our members study the implications of family formation and dissolution and its impact on the health and well being of children, parents, families, and communities. ACS data are an invaluable resource that our members, particularly those who conduct family-related research, need to understand shifting family dynamics. The “number of times married” question has given family researchers important, representative data on how many people have ever ended a marriage. Further, as the ACS is the best instrument for collecting representative data at small area levels within a national design, the ACS uniquely permits studies that address spatial variability in these marriage patterns. Losing these data will weaken the ability of family researchers to accurately portray, interpret, and follow long-term marriage trends in the United States. Losing this question will also exacerbate the data gap left when the National Center for Health Statistics discontinued collecting marriage and divorce statistics from the states in 1996.

We recognize that the content of the ACS must be expanded to accommodate questions required by the enactment of new federal mandates and laws. Nonetheless, we lament the potential loss of the “number of times married” question in order to add new questions. We hope the OMB, working with the Census Bureau, will consider retaining this question. If that is not possible, we urge the agencies to work together to analyze the ability of existing federally conducted surveys to provide the information that will be lost and to take steps to strengthen measurement in these areas. PAA and APC members would be pleased to work with their colleagues in the federal government to identify possible options.

Thank you for your careful consideration of our comments.

Sincerely,

Christine A. Bachrach
President, Population Association of America

Pamela J. Smock
President, Association of Population Centers