



June 29, 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 May 29, 2015 *Federal Register* notice, requesting comments on proposed changes to the American Community Survey (ACS) that supplement those proposed in the earlier *Federal Register* notice of April 28, 2015.

As stated in our earlier response, the PAA and APC believe that 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.

The PAA and APC continue to support the Census Bureau's efforts, in cooperation with the Interagency Council on Statistical Policy Subcommittee for the ACS, to review the content of the ACS in the contexts of federal agency requirements and respondent burden. And, we continue to stress the importance of including data users at all levels in this process as stated in our earlier response to the April 28, 2015 Federal Register notice: "... *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...*"

Given the importance of the subcommittee's work, data users need to closely monitor any proposed alterations in the criteria used to make decisions on changes in ACS content and methods. One major proposal is to establish new criteria for altering questions on computer and Internet usage, based on increased measurement error associated with rapid changes to the external environment, requiring the Bureau to base changes on cognitive testing alone. Under such circumstances field testing would not occur, either because timelines would make it unfeasible or sufficient funding is not available to conduct such tests. If these criteria are met, then changes to the questionnaire wording "could be considered without field testing." The Bureau indicated that these criteria will be evaluated on a pilot basis.

The PAA and APC understand that the computer use and Internet questions do pose challenges as rapid technological shifts may require more frequent changes to question wording. However, the Census Bureau knows all too well that even small changes to question wording can produce big and sometimes unintended changes in the data that are collected. One case in point was in 2000, when an insufficiently tested change in the examples associated with the write-in portion of the Hispanic question produced low counts of some Hispanic subgroups.¹ And, while

cognitive testing can reveal much about changes associated with question wording, the PAA and APC believe that nothing can replace the reality check provided by a more representative field test. Thus, the PAA and APC would like to stress that this proposed approach should be pursued with a large dose of caution and only in cases where it is absolutely essential to maintaining the validity of the data collected. This is especially noteworthy, in light of the impact that changes in data items will have on the creation of five-year period estimates, which are essential for small geographic applications.

Finally, the PAA and APC would like to suggest that the Bureau consider engaging in more limited field tests, to the extent that resources allow, perhaps in cooperation with some of the organizations named in the response to the April 28th *Federal Register* notice, mentioned earlier. While the Census Bureau is operating under very serious resource constraints, the testing of proposed changes to ACS questions should be among the highest priority items. Any dilution of question validity using untested changes will strike at the heart of what is a major strength of the ACS, making the case for future appropriations even more difficult.

In addition, PAA and APC are concerned about the Bureau's plans concerning "several potential opportunities to either include some questions periodically, or ask a smaller subset of ACS respondents in cases where those agencies do not need certain data annually." Such practice would preclude the inclusion of such questions in pooled 5-year estimates, making these data unavailable for geographies with fewer than 65,000 people and making it impossible for such data to be aggregated for user-defined geographies (see related point above). In considering such changes, it is critical that the Bureau consult with "*organizations, associations, and data user groups that are comprised of or work directly with non-federal data users*".

Thank you for considering our comments. We look forward to working with the Administration to preserve the integrity of the ACS.

Sincerely,



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ⁱ Cresce, Arthur R. and R.R. 2003. "Analysis of General Hispanic Responses in Census 2000." Working Paper No. 72. Washington, DC: U.S. Census Bureau.

<http://www.census.gov/population/www/documentation/twps0072/twps0072.html>

Also see: Lobo, Arun Peter, J.J. Salvo, and T. Calabrese. 2004. "Revising the Size and Characteristics of New York's Hispanic Subgroups Reported in the 2000 Census." Paper presented at the Joint Statistical Meetings, Toronto, August 2004.