



THE BROOKINGS INSTITUTION

URBAN MARKETS INITIATIVE METROPOLITAN POLICY PROGRAM

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November 10, 2006

Brian Harris-Kojetin, OMB Desk Officer
Office of Management and Budget
Washington, DC 20230
via e-mail: bharrisk@omb.eop.gov

RE: Request for comments regarding the proposed American Community Survey 2007 Methods Panel (FR Doc. E6-16728)

Dear Mr. Harris-Kojetin,

On behalf of the Urban Markets Initiative (UMI) of the Brookings Institution, I am pleased to respond to the notice placed by the Department of Commerce in the October 11, 2006 *Federal Register* asking for comments regarding the proposed American Community Survey 2007 Methods Panel.

UMI seeks to stimulate greater private and public investment in urban areas through promoting increased availability, accessibility, and accuracy of community-level demographic and socioeconomic data. From this perspective, UMI supports the Census Bureau's efforts to improve the quality of data collected in the American Community Survey (ACS) and to control its cost, particularly to safeguard the sample size. We believe that these efforts will enhance the quality of ongoing federal demographic statistical efforts.

We support the Bureau's primary focus areas for the ACS 2007 Methods Panel and its approach to addressing these areas, specifically seeking to:

- Reduce data collection costs by conducting research on the effect on mail response rates of sending the prenotice letter using standard postage rather than first-class postage.
- Test the effect on data quality, and consequently on demographic estimates, of using two different questionnaire designs to collect the basic demographic information, the ACS grid versus the decennial sequential person design.
- Assess two different question designs for field of degree, if funding is available.

From UMI's perspective, taking steps to reduce collection costs so that the current ACS sample size is maintained is essential. The reliability of ACS data for small areas already is larger than that of the Census 2000 long form with its larger sampling rate. An ACS sample that is reduced further would adversely affect data reliability as well as data uses for smaller areas, a fundamental function of the ACS. Rural areas, in particular, would be at a disadvantage. While the expected savings of \$230,000 is worthy, we are concerned, nevertheless, that research is not proposed for more substantial savings to protect the sample size.

We support the Census Bureau's tests of the effect of the questionnaire design on the demographic estimates and the plan to oversample in lower-response areas to increase the number of responses obtained from minority populations. Because data users compare the ACS and the decennial census, it is important to eliminate extraneous differences that are especially noticeable at lower geographic levels. By removing one source of difference, we expect the results of this test will contribute towards appropriate decisions on weighting.

The Census Bureau proposes to test proposed content for the new item on field of study. As this Federal Register Notice states, the "reliability and the quality of the data must remain high in order for the users to rely on the data for funding decisions." We agree that it is necessary to test the quality of newly proposed items before they are added. Likewise, we feel that funding should be sought to test items that have been on the ACS previously but for which new research raises questions about data quality. Specifically, we are referring to recent research that used administrative records to assess the quality of the questions on Food Stamps and on public assistance. The research pointed to possible changes in the wording of the questions that may improve what now appears to be very poor quality data. We think such tests will be useful not only for future ACS data but also for plans to revamp the Survey of Income and Program Participation. The proposed content test requires a Content Follow-up Reinterview operation and adds 8,000 respondent burden hours. We think that adding tests of the Food Stamp and public assistance questions would be a minimal addition given the necessity for followup for the proposed new question on field of study and would result in large benefit for little cost.

In conclusion, UMI applauds the Census Bureau's efforts to reduce costs, increase data accuracy, and improve content of the ACS. We hope you find our comments of value, and thank you and the Census Bureau for the opportunity to voice them.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Reamer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Andrew Reamer,
Deputy Director, Urban Markets Initiative