

July 25, 2011

Mr. Brian Harris-Kotejin  
OMB Desk Officer  
Washington, DC

Via email: [bharrisk@omb.eop.gov](mailto:bharrisk@omb.eop.gov)

Re: Comments on the proposed data collection for the American Community Survey

I am pleased to respond to the notice in the June 23, 2011 Federal Register asking for comments on the Census Bureau's request for renewed OMB clearance for the American Community Survey (ACS).

As a research professor at the George Washington Institute of Public Policy, I focus on federal policies and programs that support the nation's economic competitiveness. From this perspective, I believe that the continuation of the ACS is critically important to U.S. economic well-being.

That well-being depends in large part on the competitiveness of its various regions. However, for several decades now, the strength of these regional economies has been increasingly challenged by firms located outside the U.S., technological innovations, mergers and acquisitions, mismatches between employer needs and workforce skills, and asset bubble-induced recessions. As a consequence, many U.S. regions have suffered significant job loss and are struggling to regain their footing.

President Obama rightly understands that [“Winning the Future”](#)—building and sustaining the nation's economic base by successfully competing with other nations—substantially depends on “bottom-up” economic development, the day-to-day decisions of public and private sector organizations to invest in land, physical infrastructure, capital equipment, research, product development, workforce, and education and training. The principles behind this approach are reflected in a number of federal program initiatives, for example, the [Jobs and Innovation Accelerator Challenge](#), an initiative of 16 federal agencies and bureaus to accelerate innovation-fueled job creation and economic prosperity through public-private partnerships.

With 30 years' experience in regional economic development, I attest that ACS data are essential to public and private sector decisions that provide the basis for sustained competitiveness. Businesses of all sizes use ACS data to identify markets, determine site location and product mix, and assess labor force availability. In light of [research](#) that shows the critical role of new firms in job creation, it is important to know that entrepreneurs rely on ACS data to make key business start-up and development decisions. State and local governments and public-private partnerships analyze ACS data to determine the need for, the design of, and the impacts of programs in economic and workforce development, transportation, and housing. My recent study for the Brookings Institution indicates that the federal government uses the ACS to distribute

about \$100 billion annually to states and communities for competitiveness-related purposes of economic development, employment, education and training, transportation, and commerce and housing credit.

ACS data at the state, metro, county, place, and neighborhood level of particular importance to decisions that enhance regional competitiveness include:

- demographic characteristics (particularly age, gender, ethnicity, language, country of origin)
- job characteristics (industry, occupation, earnings)
- educational attainment
- migration
- journey-to-work
- housing characteristics

While the ACS is relatively new, it is the latest incarnation of a long-standing federal tradition, going back to 1810, of using census surveys to gather data for economic and other forms of public policy. A number of questions on the ACS can be traced back to 1850. Its immediate predecessor, the decennial long form, was initially developed as an innovative tool in 1940 to respond to the Great Depression. For two centuries, Congress and the Executive Branch have recognized that only the federal government has the knowledge, objectivity, resources, and authority to regularly collect and publish data consistent over time and space. OMB's renewed approval of the ACS would maintain the valuable tradition of American households periodically describing their characteristics in service to the national, state, and community economic good.

References that support the above argument about the importance of the ACS for regional competitiveness include:

- Patrick Jankowski Vice President, Research Greater Houston Partnership, ["Economic Development and the American Community Survey,"](#) March 2010
- Purdue Center for Regional Development and the Indiana Business Research Center at Indiana University's Kelley School of Business, ["Crossing the Next Regional Frontier: Information and Analytics Linking Regional Competitiveness to Investment in a Knowledge-Based Economy,"](#) October 2009
- Andrew Reamer, Brookings Institution, ["Surveying for Dollars: The Role of the American Community Survey in the Geographic Distribution of Federal Funds,"](#) July 2010
- Rachel Carpenter, Brookings Institution, ["Socioeconomic Characteristics on Decennial Census Program Questionnaires, 1850-2010,"](#) July 2010

In conclusion, I strongly support the continuation of the ACS in light of its importance to national and regional economic competitiveness. I hope you find my comments of value and thank you for the opportunity to provide them.

Sincerely,

A handwritten signature in black ink that reads "Andrew Reamer". The signature is fluid and cursive, with the first name "Andrew" and last name "Reamer" clearly distinguishable.

Andrew Reamer, Research Professor  
George Washington Institute of Public Policy  
George Washington University