



# THE BROOKINGS INSTITUTION

1775 Massachusetts Avenue, NW Washington, DC 20036-2103  
Tel: 202-797-6000 Fax: 202-797-6004  
[www.brookings.edu](http://www.brookings.edu)

June 29, 2007

Mr. Brian Harris-Kojetin  
Office of Information and Regulatory Affairs  
Office of Management and Budget, NEOB, Room 10201  
725 17th Street, N.W.  
Washington, DC 20503

via e-mail: [bharrisk@omb.eop.gov](mailto:bharrisk@omb.eop.gov)

RE: Request for comments regarding proposed Generic Clearance for Questionnaire Pretesting Research

Dear Mr. Harris-Kojetin,

On behalf of the Metropolitan Policy Program (MPP) of the Brookings Institution, I am pleased to respond to the notice placed by the Department of Commerce in the June 8, 2007 Federal Register asking for comments regarding the proposed Generic Clearance for Questionnaire Pretesting Research.

MPP promotes innovative solutions to help the nation's metropolitan communities grow in more inclusive, competitive, and sustainable ways. From this perspective, we believe that the economic and demographic censuses and surveys the Census Bureau conducts are critically important to the health and well-being of metropolitan America. Therefore, we believe that the Census Bureau should receive generic clearance to conduct small-scale pre-testing to improve the questionnaires and related procedures before they are sent to respondents. Such research is a cost-effective means to improve data quality and provides quick turn-around on problem areas and solutions.

As part of the work to be carried out under the proposed generic clearance, we suggest that the Census Bureau conduct research to test alternative wording for the public assistance question that is planned for the proposed 2008 American Community Survey (ACS). A small study of administrative records indicates that there appear to be significant problems with the quality of the data collected for that item. As the data from this question are used for major national and state policy issues and funding, we consider it critical to improve this question as soon as possible.

We hope you find our 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 written in a cursive, flowing style.

Andrew Reamer, Fellow  
Metropolitan Policy Program