



# 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 data collection for the 2008 American Community Survey

Dear Mr. Harris-Kojetin,

On behalf of the Metropolitan Policy Program (MPP) of the Brookings Institution, I am pleased to respond to the notice in the May 30, 2007 Federal Register asking for comments regarding plans for the 2008 American Community Survey (ACS) data collection.

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 ACS is critically important to the health and well-being of metropolitan America. In particular, we believe that the availability of ACS data will lead to more appropriate and effective private and public sector investments. Far more than any other dataset collected by the federal government, continued implementation of the ACS will enable private and public decision-makers to obtain a current, detailed picture of the demographic and socioeconomic characteristics of the nation's metropolitan areas, cities, and neighborhoods. Specifically:

- The ACS allows markets to work more efficiently. With continued implementation, businesses increasingly will use ACS data to identify customer bases, determine site location and product mix, and assess labor force availability.
- The ACS collects information that America's communities need in order to function well. Local governments, metropolitan planning councils, and community-based and other local nonprofits will use ACS data to determine the need for, the design of, and the impacts of programs in realms such as transportation, health, education, workforce development, community and economic development, housing, and social services.
- The ACS allows the federal government to distribute billions of dollars in federal assistance annually to states and localities on the basis of up-to-date data, not data from the prior decennial census.

Further, we see the ACS as a critical factor in the success of the 2010 Census as it enables the latter effort to focus solely on accurately counting the population of the United States.

We offer several comments, regarding the Census Bureau's proposed changes to the ACS questionnaire for 2008. In general, we view the proposed changes as highly important for ensuring that the ACS is effective in obtaining complete and accurate respondent information and believe it adequately addresses the needs of data users, federal agencies, and Congress. We have reviewed the research results from the 2006 ACS Content Report series and applaud both the intent of the proposed changes based on those studies and the improvements to data quality. We found the methodology of the data collection to be logical and appropriate. We provide comments on specific aspects of the survey instrument below.

Our review of the instructions to the right of the third arrow on p. 1 left us uncertain how the respondent is to treat people who spend more than 2 months but less than 10 months at the address. The first bullet says to include all persons living or staying at the residence for more than 2 months; the fourth bullet says not to include anyone living somewhere else for more than 2 months. While the fourth bullet does imply that the first bullet should be ignored for college students and military personnel living at the address for more than 2 months, the respondent still may be unsure what to do. And for those not covered by the examples in the fourth bullet, such as a retired person who spends 4 months in a summer or "snowbird" residence and 8 months in a primary residence, the instructions give the respondent no assistance in how to reconcile the apparent contradiction between the first and fourth bullets.

We note that the instructions on p. 2 of the 2007 questionnaire had a last section that implied it was alright to list people in a vacation home where someone stays for more than two months. The absence of this paragraph in the proposed 2008 version serves to increase the possibility of respondent confusion regarding the apparent contradiction between bullets one and four. While we do not offer alternative language for the 2008 instructions, we strongly encourage a rewriting of these instructions so to provide clarity and remove possible confusion.

On a related topic, we are concerned about the proposed elimination of the question on seasonal residence (H25 in the 2007 questionnaire). One of the promises of the ACS has been that local governments would be able to ascertain the characteristics of their permanent and seasonal populations in order to better make decisions on service provision. This question has particular relevance to areas that have a large share of seasonally-occupied homes, and its use will become even more important as the wave of workers reaching retirement age grows. We appreciate the fact that, as cited in the Census Bureau response to our comment on its January 4<sup>th</sup> notice in the *Federal Register*, one purpose of the H25 question was to evaluate the effects to ACS estimates of people living in more than one residence during the survey year, and that purpose has been accomplished. However, from the ACS Housing Fact Sheets prepared for Congress ([http://www.census.gov/acs/www/SBasics/congress\\_toolkit/Housing%20Fact%20Sheets.pdf](http://www.census.gov/acs/www/SBasics/congress_toolkit/Housing%20Fact%20Sheets.pdf)), we see that the question has value for intercensal population estimates and other public and private decision-making purposes. We also see that the 2006 ACS Content Test did not evaluate this question. Rather than eliminate the question, we support retaining it and, if useful, carrying out research to improve it.

In Question P8, we are pleased to see the added box asking the date of naturalization. Having this information will enable analyses on length of time to naturalization, as well as the extent to which time to naturalization is associated with particular demographic, social, and economic characteristics.

We support the inclusion in Question P11 of separate boxes for those holding a regular high school diploma and those with a GED or alternative credential. Research indicates significant differences in economic outcomes between those with the first type of high school credential and those with the second.

We especially support the inclusion of Question P15 on health insurance. Currently, Census Bureau survey data regarding individuals' access to health care are not available below the state level. The

availability of health insurance coverage data from the ACS for smaller jurisdictions and neighborhoods will help state and local policymakers, hospitals and health care providers, and community organizations better understand and address the need for improved access to healthcare, particularly for low-income populations.

We are aware that research with administrative records raised serious questions about the quality of ACS data on the use of public assistance (Question P46f). At the 2006 Conference for the National Association of Welfare Researchers, Jane Staveley of the Jacob France Institute at the University of Baltimore gave a preliminary report of research conducted with Victoria Lynch and Dean Resnick of the Census Bureau entitled, "Why do TANF Recipients Underreport in Surveys: Evidence from Matching Census Survey Data with Maryland Administrative Records" (<http://www.ubalt.edu/jfi/jfi/staff/jstaveley.htm>). That study compared Maryland's administrative records with responses to the 2001 American Community Survey's question on receipt of public assistance to identify the discrepancies. The study found that:

- The 2001 ACS published estimate missed 55 percent of the total number of public assistance households.
- False-negative reporting seemed to account for virtually all of the estimate count discrepancy.
- TANF households that were correctly reported were not representative of all TANF households in the sample.

The study indicated likely reasons for misreporting by respondents and suggested research on the public assistance question and related instructions that seemed likely to yield improvements. Admittedly, this study was done on a small sample and only for one state; yet, unless the results are flawed (the Census Bureau has not yet officially released this report but they have not indicated errors), the results are so striking that we urge further testing of this question as a matter of high priority. While we realize the opportunity for large-scale survey testing has passed, given the importance of these data for public policy we urge consideration of cognitive testing on this question, followed by revisions to the question as appropriate.

In conclusion, MPP strongly supports the continuation of the American Community Survey, applauds many of the proposed changes to the 2008 questionnaire, and asks the Census Bureau to consider our concern regarding the instructions and our recommendations for retaining the seasonal residence question and improving the question on public assistance. We hope you find our comments of value, and thank you for the opportunity to provide 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, Fellow  
Metropolitan Policy Program