



May 26, 2015

Sent via email to OIRA_Submission@omb.eop.gov

**Re: Proposed Information Collection; Comment Request; The American Community Survey
Content Review Results** (Document Citation: 80 FR 23501)

To Whom It May Concern:

The National Women's Law Center (the Center) is a non-profit, non-partisan organization that has been a leader in analysis and advocacy to promote policies that improve the lives of women and their families.

We appreciate the opportunity to respond to the comment request published by the Department of Commerce (the Department) on April 28, 2015 at 80 FR 23501, which proposes possibly reducing the frequency of certain questions on the American Community Survey (ACS).

We are very pleased that the Census Bureau (the Bureau) has recommended retaining vital questions regarding field of degree and marital history in the 2016 ACS. As we outlined in our response to the request for comments regarding the ACS Content Review Results issued on October 31, 2014 (79 Fed. Reg. 64743), the question regarding field of undergraduate degree is critical for analyses regarding racial and gender disparities in educational achievement, employment, occupation, and incomes, and the battery of marital status questions is invaluable for research regarding the disproportionate impact of voter identification laws on women, eligibility for and amount of benefit from certain programs (such as premium tax credits under the Affordable Care Act), and estimations of women's retirement security.¹

Given the value of these questions, we are concerned that the Bureau is contemplating asking the battery of questions regarding marital status on a less than annual basis. These questions, essential for the reasons discussed in our initial comments, as well as for population projections by government agencies including the Social Security Administration and the Congressional Budget Office, are the only reliable source for annual statistics on marital status in the U.S.² Additionally, given the relatively few number of people who experience changes in marital status each year, these questions need to be included in a large data set to ensure their accuracy, especially for state-level analysis or breakdown by demographic subgroups. Thus, including them on the ACS is particularly important.³

In sum, these questions are critical for many important research questions and, particularly in light of their low cost,⁴ we strongly urge their inclusion in the ACS survey instrument every year.

The Center appreciates this opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads 'Joan Entmacher'.

Joan Entmacher
Vice President for Family Economic Security

A handwritten signature in blue ink that reads 'Katherine Gallagher Robbins'.

Katherine Gallagher Robbins
Director of Research and Policy Analysis

With the law on your side, great things are possible.

¹ Joan Entmacher and Katherine Gallagher Robbins, National Women's Law Center, Comments on American Community Survey Content Review (Dec. 17, 2014) *available at* <http://www.nwlc.org/resource/nwlc-comments-american-community-survey-content-review>.

² Steven Ruggles, Minnesota Population Center, RE: Proposed Information Collection: Comment Request: The American Community Survey Content Review Results 80 FR 23501/April 28, 2015/pp. 23501-23503 (May 9, 2015) *available at* http://www.pop.umn.edu/sites/www.pop.umn.edu/files/ACS_Letter_Ruggles_2015.pdf.

³ *Id.*

⁴ Entmacher and Gallagher Robbins, *supra* note 1.