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General Comment

Access to Independence (ATI) (Cortland, NY) is a strong supporter of the Bureau of the Census's interest in gathering feedback to inform the proposed revisions to the American Community Survey and Puerto Rico Community Survey. After reviewing the information found at Docket No. USBC-2022-0014, we hope the rulemaking stakeholders will take into consideration our comments.

First, under section 1 Abstract, it states "In 2024, the ACS plans to add an internet self-response option to the group quarters data collection operation." ATI strongly supports this change as having multiple formats increases the accessibility of the survey for disabled residents. We caution though that the online version of the ACS must be accessible to individuals using screen readers and other web accessibility standards to ensure everyone can easily access the survey.

Second, under section 1 Abstract, it states "Approved topics underwent cognitive testing to verify that proposed question wording would be understood by respondents." While this testing is crucial, ATI is interested to know if the Bureau includes individuals with intellectual and/or developmental disabilities as well during testing sessions. ATI also wants to remind the survey writers that they should always utilize plain language to craft the questions..

Third, under section 1 Abstract, it states "The journey to work question would be updated to include ride-sharing services as a mode of transportation to work...." ATI is glad to see your interest in collecting ride-share data and encourages the survey to also ask why people may not use rideshare services. Since rideshare services argue they are not "transportation companies", such services are still inaccessible to physically disabled individuals and do not address lack of transportation we face.

In conclusion, all people, regardless of their disability, must be able to understand and complete the survey as independently as possible. We strongly support the Bureau of the Census's inclusion of people with disabilities in every stage of this initiative to ensure we are equally represented in the collected data.

Thank you for the opportunity to provide feedback, and for continuing to work toward a future where all people have the equal opportunity to be counted as valued residents of our country.