Comments on FRN: 88 FR 14976, Request for Comment on Proposed Revisions to American Community Survey (ACS) and Puerto Rico Community Survey (PRCS)

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                    Thoughts expressed in this document are our own.

In response to this FRN, we have two areas we wish to comment on.

1. As representatives of stakeholders and the data user community, we caution against removing the ancestry question from the ACS. This decision would be premature considering the upcoming potential revision of the OMB race/ethnicity standards. Though removing the question would reduce redundancy for the time being, this may not be the case should the standards change the format and detail of the questions.

    More research is needed to support the removal of this question, even after the standards are revised. Respondents may not equate ancestry with their race/ethnicity identity subgroups or national origin, which may result in murky data, or leave out certain groups entirely. Currently in the ACS microdata, ancestry responses are reported as 1st and 2nd entry. Given the current format of the race/ethnicity questions with printed origins for each reported group, this coding would not be possible, especially if a respondent checked more than one box.

    Further, since questions on the ACS are based on federal law mandates, requirements, or federal court ruling needs (e.g., the hate crime ruling on which the ancestry question is based), adequate proof that the data from the race/ethnicity question(s) alone would be sufficient to meet that need has not been provided. Therefore, until more research is conducted and the final OMB revisions are in place, we do not support the removal of the ancestry question.

2. We agree that the addition of a ride-sharing option in the journey to work question will reduce response ambiguity. However, due to the increased prevalence of hybrid work due to the COVID-19 Pandemic, data collected on journey to work in its current form may be misleading. We advise the Bureau to consider adding an option that would allow those who work from home a few days a week, or whose hybrid schedules may vary, to still be able to mark the transportation they use most when not working for home. This could include adding an additional option indicating "work from home + _____" with a fill in the blank option for most used transportation to work.