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November 12, 2009

Brian Harris-Kojetin, OMB Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget, NEOB, Room 10201
725 17th Street, NW
Washington, DC 20503

**Metropolitan
Policy
Program**

via e-mail: bharrisk@omb.eop.gov

Re: Proposed Information Collection for the American Community Survey Methods Panel Tests

Dear Mr. Harris-Kojetin,

On behalf of the Metropolitan Policy Program (Metro) of the Brookings Institution, I am pleased to respond to the notice in the October 13, 2009 *Federal Register* notice requesting comments regarding the Census Bureau's proposed information collection for the American Community Survey (ACS) Methods Panel Tests.

Metro 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 successful conduct of the ACS is vitally important to the health and well-being of metropolitan America. We have long supported the annually updated ACS as a replacement for the once-a-decade decennial long form. In several ways, ACS data products are important assets for facilitating the health and well-being of metropolitan America:

- ACS products allow the nation's economy to work more efficiently. Businesses use ACS data to identify markets, determine site location and product mix, and assess labor force availability.
- Local governments, metropolitan planning councils, and community-based and other local nonprofits use ACS data to determine the need for and the design and impacts of programs in realms such as transportation, health, education, workforce development, community and economic development, housing, and social services.
- Researchers will use the 5-year ACS data products to evaluate neighborhood demographic and socioeconomic trends.

An ongoing data collection effort of the magnitude of the ACS requires that the Census Bureau establish "research, testing and evaluations aimed at improving overall ACS data quality." Metro believes that the proposed ACS Methods Panel Tests will significantly improve the quality and value of ACS data. Testing will allow the Census Bureau to monitor data quality by evaluating response bias and reliability for each ACS item. The results will provide the Census Bureau with an objective basis for improving the question content and collection procedures; achieve survey cost efficiencies, lessen respondent burden, and improve response rates.

We support the 2010 ACS Content Test for the various topics identified in the OMB submission. We are particularly pleased to see that the Census Bureau will test a parental place of birth question. This question was on the decennial census long form for decades until it was replaced by the ancestry questions, much to the dismay of social scientists interested in the dynamics of immigrant populations.

That said, we are very concerned that the proposed wording for the parental place of birth question will cause respondent confusion and lead to incomplete or inaccurate answers regarding persons born in U.S. territories. The proposed text – “In what country was this person’s FATHER born? Print name of country, or Puerto Rico, Guam, etc.” – has several problems. The question implies that “Puerto Rico, Guam, etc.” are countries. The instruction then places the burden on the respondent to comprehend that the Census Bureau wants the respondent to write “United States” for parents born within the 50 states but the name of U.S. territory (which are not countries) for parents born in “Puerto Rico, Guam, etc.” Finally, the incomplete list of territories may lead some respondents (e.g., with parents from the U.S. Virgin Islands) to be unsure how to answer the question.

Consequently, as a term of clearance, we request that OMB direct the Census Bureau to prepare new wording for the parental place of birth question that corrects these various problems.

For consideration by the Census Bureau and OMB, we offer the following wording as an alternative:

Where was this person’s [father/mother] born?

- In the United States
- In Puerto Rico, Guam, the U.S. Virgin Islands, American Samoa, N. Marianas or other U.S. territory: _____ (specify)
- In a foreign country: _____ (specify)

This wording mirrors that of Q7 and the response categories of Q8 on the current ACS questionnaire; the language has been tested and fielded already. In addition, using the same wording for all three place of birth questions should facilitate increased accuracy. The response categories also break down along the lines of nativity as defined by the U.S. Census Bureau.

The proposed version for field testing lists only Puerto Rico and Guam as examples of U.S. territories. We believe listing all the U.S. territories avoids confusion.

We fully support the intent of the ACS reinterview evaluations and agree that the topics chosen for this purpose are of high importance. However, we are concerned that the sample size may be insufficient to evaluate data quality for certain important purposes. For one, it is not large enough to evaluate data quality for race/ethnic groups. As the questions about Food Stamp and cash public assistance reciprocity have a relatively low prevalence in the population and so higher sampling errors, we also question whether the Census Bureau will be able to answer questions about the data quality of these two items. From matching studies with administrative records, we

know that questions on Food Stamp and cash public assistance have excessively high error rates. The proposed question on Food Stamps refers to assistance “in the past 12 months” even though research suggests that many respondents respond about their current status rather than their past history.

We support objective testing of the Internet option for data collection so that the Census Bureau can provide concrete evidence if this is an effective collection mode. Further, as the ACS is now available only in English and Spanish, we encourage the Census Bureau to test the value of providing the ACS questionnaire on the Internet in the other languages used in the 2010 Census.

In conclusion, Metro strongly supports the proposed information collection for the 2010-2012 American Community Survey Methods Panel Testing. We believe it is a cost-effective program with a reasonable level of respondent burden. We hope the Census Bureau finds our comments of value and we look forward to its response.

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