

**To:** Office of Information and Regulatory Affairs (OIRA), Office of Management and Budget  
Ms. Glenna Mickelson, Office of the Chief Information Officer, Department of Commerce  
**From:** Guillermina Jasso, Chair, Census Scientific Advisory Committee (CSAC) – on behalf of CSAC  
**Topic:** Comments on FRN, “DOC Submission for OMB Review: Comment Request,” April 28, 2015,  
regarding the American Community Survey  
**Date:** May 19, 2015

We are writing as members of the federally mandated Census Scientific Advisory Committee (CSAC), which gives advice to the Director of the Census Bureau on scientific matters. This is in response to the Federal Register Notice published April 28, 2015, “Submission for OMB Review: Comment Request,” on the American Community Survey.

We and many other organizations, committees, and individuals submitted comments in response to the Federal Register Notice of October 31, 2014, on the proposed deletion of questions from the American Community Survey. We are delighted that the Census Bureau has proposed to the OMB that the three Marital History questions and the Undergraduate Field of Study question that were originally proposed for removal are no longer proposed for removal. We have no objection to the removal of the Business/Medical Office on Property question.

We appreciate very much the responsiveness of the Census Bureau to the concerns of the business, governmental, and research communities about the crucial value of the marital history and undergraduate field of study items.

We stated in our December 21, 2014 Comment and we still think that the ACS Content Review process conducted in 2014 was seriously flawed. We reiterate our concerns in this comment. We also think that there is a very good argument for adding a Parental Place of Birth item to the ACS; below we also reiterate the arguments for this.

### **The Methodology Behind the ACS Content Review Recommendations for Elimination of Items**

The ACS Content Review was based on a cost-benefit analysis. The cost of each question was assessed based on cognitive burden, sensitivity, complaints, median seconds to answer, and response rate. The benefits were defined as uses of the data by federal agencies, especially for the analysis of small geographic areas. CSAC made it clear in our earlier response that this was a very limited view of the usefulness of items. Although the criteria were presented as objectively determined, they were not subjected to peer review, as far as we can ascertain. The definition of benefits was particularly narrow and ignored many uses of ACS items both by federal agencies and by the broader research community.

CSAC also believes that the methods used to develop summary measures of costs and benefits were arbitrary and inadequate. A five-member advisory committee assessed each ACS item. For each ACS question, each advisory committee member assigned a score on each criterion (6 costs criteria and 13 benefits criteria).

The values of the cost and benefits indices for each ACS question were plotted on a graph, with costs on the horizontal axis and benefits on the vertical axis. A “Quadrant Analysis” was done, and the questions that fell in the lower right quadrant (low perceived benefit and high perceived cost) were to be set aside for removal. There were, however, no questions that had both low benefit and high cost. Accordingly,

the Content Review recommended removing seven questions that fell into the lower left quadrant (low benefit and low cost).

The seven questions targeted for removal were judged to be of low benefit because there are no mandatory uses of these questions by federal agencies at the sub-state level. The Content Review analysis assumes that the only reason a question needs to be on the ACS is to generate small-area statistics for federal agencies, because the ACS is the only survey large enough to be used for small-area statistics. Given the myriad other uses and users of the ACS, that assumption is incorrect.

Finally, this approach makes some very strong assumptions about the experience and wisdom of the five-member advisory committee.

### **Additional Questions on Parental Place of Birth**

The results of the 2010 ACS Content Test demonstrated that questions on parental place of birth are clearly understood by respondents and provide consistent and reliable data. Based on these results and on the immense scientific justification for these questions in an era with a high level of immigration, the CSAC recommended in our December 21, 2014 Comment that both questions be included on the ACS starting as soon as possible using the question format tested and with the placement used by the control panel (i.e. between the year of entry and the school enrollment questions). The results of the ACS Content Test have also demonstrated that, if the control placement were to be used, there is currently enough space on the ACS questionnaire for both questions on parental place of birth. We reiterate here that we strongly recommend their inclusion in the ACS.

### **Concluding Comments**

We appreciate the reconsideration by the Census Bureau of which items to remove from the ACS. We think that the current recommendation is far superior to earlier plans. We also think there should be serious consideration of adding parental place of birth. Thank you for your consideration.