



Housing Assistance Council

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June 26, 2015

U.S. Department of Commerce
U.S. Census Bureau
4600 Silver Hill Road
Suitland, MD 20746

Re: The American Community Survey. Changes in 2016 ACS Content Concerning the Flush Toilet Section of the Plumbing Facilities Question. [OMB Control Number: 0607-0810. 80 FR 30655 – Document Number: 2015-13061]

Dear U.S. Census Bureau:

The Housing Assistance Council (HAC) appreciates this opportunity to submit comments to the U.S. Department of Commerce and U.S. Census Bureau on the proposed changes to the 2016 American Community Survey (ACS) content concerning the flush toilet section of the plumbing facilities question. [OMB Control Number: 0607-0810. 80 FR 30655 – Document Number: 2015-13061].

HAC is a national nonprofit organization that has supported affordable housing efforts in rural areas of the United States since 1971. HAC emphasizes local solutions, empowerment of the poor, reduced dependence, and self-help housing strategies. With more than 40 years of experience supporting and developing affordable housing across rural America, the Housing Assistance Council is uniquely positioned to comment on issues related to substandard housing and the assessment of housing quality.

While the Census Bureau presented several proposed revisions to the American Community Survey, HAC's comments focus on one specific component of the proposed rule related to *Changes in 2016 ACS Content Concerning the Flush Toilet Section of the Plumbing Facilities Question*. This proposed change directly impacts the ability to understand and remedy substandard housing occurrences in rural communities.

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HAC is an equal opportunity lender.

Proposed Changes to ACS Content Concerning the Flush Toilet Section of the Plumbing Facilities Question

The ACS provides relatively limited data on basic structural and quality characteristics of American homes, such as adequate plumbing and kitchen facilities. The Census survey classifies a home as having adequate plumbing facilities if it contains three basic characteristics of: 1) 'hot and cold piped water', 2) a 'flush toilet', and 3) a 'bathtub or shower.' Citing an "unnecessary burden on the American public" the Census Bureau is proposing to discontinue the 'flush toilet' criteria when determining if a housing unit has adequate plumbing.

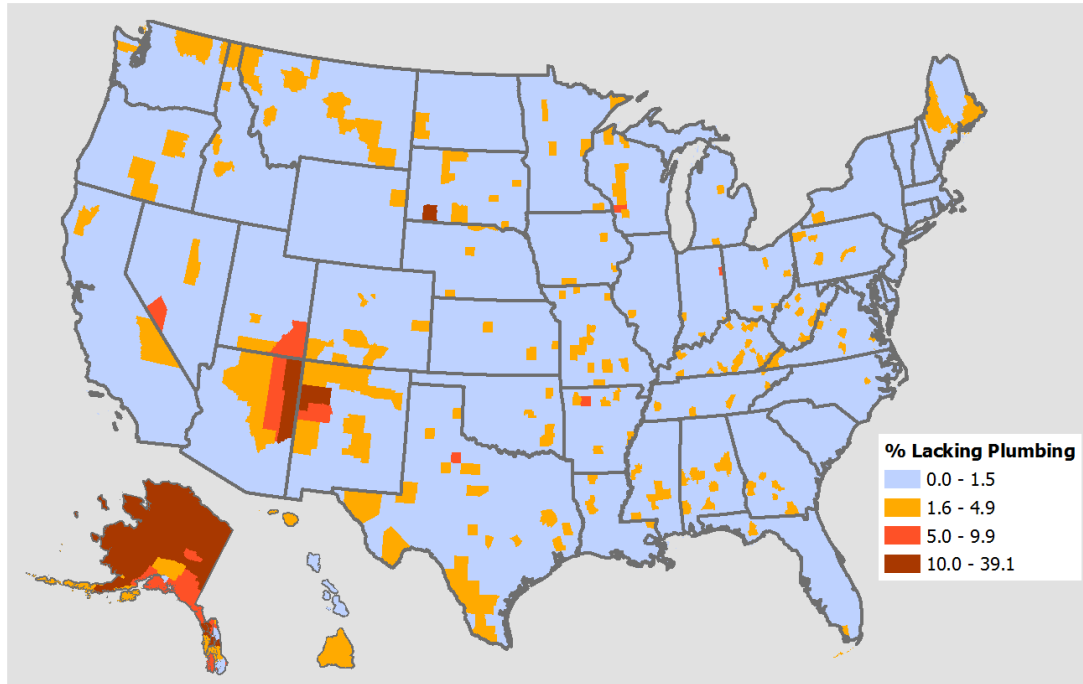
HAC Comment: The Housing Assistance Council opposes the Census Bureau's plan to eliminate the flush toilet indicator from the ACS. HAC recommends that the plumbing facilities question in the ACS be retained in its current form. This housing characteristic it is an important indicator of basic housing quality, and integral to help inform policies and strategies to eliminate substandard housing in the United States.

Long-term efforts to improve housing conditions have resulted in dramatic reductions in the most egregious housing deficiencies. In 1970, more than 3.5 million homes in the United States were without complete plumbing facilities. In 2013, the number of homes lacking adequate plumbing declined to roughly 570,000, or less than 1 percent of the nation's housing stock. However, substandard housing has not entirely disappeared. An estimated 70 percent of 'plumbing-inadequate' homes lack a functioning flush toilet.

A large number of homes without working toilets are located in rural and small town areas. In some rural communities, especially on Native American lands, the incidence of homes lacking basic plumbing can exceed 20 times the national rate. For example, in Apache County, AZ, part of the Navajo Nation, an estimated 17 percent of homes lack adequate plumbing. The state of Alaska has some of the highest rates of homes without toilets. Overall, 8 percent of rural homes in Alaska lack proper plumbing, and in some Alaska counties, nearly 40 percent of homes are without indoor plumbing.

Inadequate Plumbing, 2013

Approximately 290 counties have a substantial number of homes that lack adequate plumbing (inadequate plumbing rates 3 times or higher than the national level are colored in shades of orange or red).



Source: Housing Assistance Council (HAC) Tabulations of 2009-2013 American Community Survey



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For an interactive version of the map visit: <http://arcg.is/1TqwPlk>

The Census Bureau asserts that “there are very few instances where flush toilets alone determine the existence of substandard housing.” In actuality, the proposal to discontinue the toilet question would almost certainly result in an undercount of U.S. homes considered to lack basic plumbing. Using the Census’ more detailed Public Use Microdata (or PUMS), an estimated 32,000 homes are classified as lacking plumbing solely on the characteristic of no working toilet. The proposed questionnaire change would result in an estimated 8 percent undercount of homes lacking adequate plumbing. This omission would minimize the problem of households lacking the most basic of housing necessities. Ultimately, the Census Bureau’s proposal is counterproductive in efforts to identify and inform strategies that help remedy such basic housing problems. While some may not want to acknowledge it, there are still hundreds of thousands of families in this country living in housing conditions typically associated with developing nations.

Finally, the primary assertion by the Census Bureau that answering questions on the functionality of a flush toilet in one’s home is an ‘unnecessary burden on the American public’ begs a relatively simple question. If checking a box on a form indicating that you

U.S. Department of Commerce

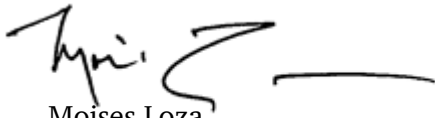
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have a toilet is a burden, what is the burden for the more than one million Americans living in a home without a functioning bathroom?

HAC is pleased to have this opportunity to provide comments on the proposed changes in 2016 American Community Survey (ACS) content concerning the flush toilet section of the plumbing facilities question. Please do not hesitate to contact me if you need additional information or clarification of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Moises Loza', followed by a horizontal line.

Moises Loza
Executive Director